BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843
www.boardofwatersupply.com

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SEP 23 2020

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Manager and Chief Engineer

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Deputy Manager and Chief Engineer

September 11, 2020

Acting Director
Office of Environmental Quality Control
State of Hawai'i
Department of Health
235 South Beretania Street, Room 702
Honolulu, Hawai'i 96813

The Honorable Mayor Kirk Caldwell
City and County of Honolulu
530 South King Street, Room 300
Honolulu, Hawai'i 96813

Dear OEQC Acting Director and Mayor Caldwell:

Subject: Final Environmental Impact Statement for
Board of Water Supply Beretania Complex Redevelopment Project
Tax Map Key (1) 2-1-036: 001, 004 and 005
Island of Oahu, Waikiki Ahupua'a, Kona District

The Board of Water Supply (BWS) respectfully transmits the enclosed documents package for the Final Environmental Impact Statement (FEIS) for the BWS Beretania Complex Redevelopment Project referenced above. Please publish a notice of availability in the Office of Environmental Quality Control's (OEQC) September 23, 2020 edition of ***The Environmental Notice***.

We are submitting this letter, the OEQC Publication Form, and four (4) pdf copies of the FEIS. The OEQC publication form is also provided in MS-Word. The FEIS includes copies of all written comments received during the 45-day public consultation period for the Draft EIS, as well as responses to all comments.

Also enclosed is the FEIS distribution list for OEQC verification under Section 11-200-20, Hawaii Administrative Rules. All organizations and individuals on the list will be sent a letter via email with a URL link to access the FEIS from the OEQC website. These letters will be sent on or before the September 23, 2020 publication date.

If there are any questions, please contact Michael Matsuo of our Land Division at 748-5951.

Very truly yours,

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

Attachments

21-050

AGENCY
PUBLICATION FORM

Project Name:	Board of Water Supply Beretania Complex Redevelopment Project
Project Short Name:	BWS Beretania Complex Redevelopment
HRS §343-5 Trigger(s):	Use of state or county lands
Island(s):	Oahu
Judicial District(s):	Kona District
TMK(s):	[1] 2-1-036:001 & 2-1-036:005 (portion)
Permit(s)/Approval(s):	Construction and building permits
Proposing/Determining Agency:	Board of Water Supply, City and County of Honolulu (BWS)
Contact Name, Email, Telephone, Address	Ernest Y. W. Lau, P.E., Manager and Chief Engineer Board of Water Supply 630 South Beretania Street Honolulu, Hawaii 96843 bwsredevelopmenteis@hhf.com; phone: (808) 748-5061
Accepting Authority:	Mayor, City and County of Honolulu
Contact Name, Email, Telephone, Address	Mayor Kirk Caldwell City and County of Honolulu c/o Board of Water Supply 630 South Beretania Street Honolulu, Hawai'i 96843 bwsredevelopmenteis@hhf.com; phone: (808)748-5061
Consultant:	HHF Planners
Contact Name, Email, Telephone, Address	Scott Ezer, Vice President HHF Planners 733 Bishop Street, Suite 2590 Honolulu, HI 96813 sezer@hhf.com; phone: (808) 457-3158

Status (select one)	**Submittal Requirements**
____ DEA-AFNSI	Submit 1) the proposing agency notice of determination/transmittal letter on agency letterhead, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the DEA, and 4) a searchable PDF of the DEA; a 30-day comment period follows from the date of publication in the Notice.
____ FEA-FONSI	Submit 1) the proposing agency notice of determination/transmittal letter on agency letterhead, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the FEA, and 4) a searchable PDF of the FEA; no comment period follows from publication in the Notice.
____ FEA-EISPN	Submit 1) the proposing agency notice of determination/transmittal letter on agency letterhead, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the FEA, and 4) a searchable PDF of the FEA; a 30-day comment period follows from the date of publication in the Notice.
____ Act 172-12 EISPN ("Direct to EIS")	Submit 1) the proposing agency notice of determination letter on agency letterhead and 2) this completed OEQC publication form as a Word file; no EA is required and a 30-day comment period follows from the date of publication in the Notice.
____ DEIS	Submit 1) a transmittal letter to the OEQC and to the accepting authority, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the DEIS, 4) a searchable PDF of the DEIS, and 5) a searchable PDF of the distribution list; a 45-day comment period follows from the date of publication in the Notice.
__X__ FEIS	Submit 1) a transmittal letter to the OEQC and to the accepting authority, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the FEIS, 4) a searchable PDF of the FEIS, and 5) a searchable PDF of the distribution list; no comment period follows from publication in the Notice.

____ FEIS Acceptance Determination	The accepting authority simultaneously transmits to both the OEQC and the proposing agency a letter of its determination of acceptance or nonacceptance (pursuant to Section 11-200-23, HAR) of the FEIS; no comment period ensues upon publication in the Notice.
FEIS Statutory Acceptance	Timely statutory acceptance of the FEIS under Section 343-5(c), HRS, is not applicable to agency actions.
____ Supplemental EIS Determination	The accepting authority simultaneously transmits its notice to both the proposing agency and the OEQC that it has reviewed (pursuant to Section 11-200-27, HAR) the previously accepted FEIS and determines that a supplemental EIS is or is not required; no EA is required and no comment period ensues upon publication in the Notice.
____ Withdrawal	Identify the specific document(s) to withdraw and explain in the project summary section.
____ Other	Contact the OEQC if your action is not one of the above items.

Project Summary
Provide a description of the proposed action and purpose and need in 200 words or less.

The Board of Water Supply, City and County of Honolulu (BWS) intends to issue a Request for Proposals to redevelop approximately 128,100 square feet of its 6.3 acre Beretania Complex located at 630 South Beretania Street, Honolulu. The purpose of the proposed action is to provide a revenue stream to help offset a portion of BWS's operating expenses and capital improvements costs. BWS will enter into a development contract with a qualified developer and issue a ground lease for the use of a portion of the Beretania Complex. The lease term will not exceed 65 years and will provide for continued and uninterrupted use of existing BWS buildings and operational facilities. Redevelopment will occur on areas currently being used as ground level parking for BWS employees, equipment and staff vehicles. All lost parking spaces will be replaced in the redevelopment.

Future redevelopment of the Beretania Complex will be determined by the selected developer. However, three possible redevelopment scenarios are evaluated in the DEIS: 1) Assisted Care Living Facility and Office Building; 2) Affordable Senior Rental Apartments and Office Building; and 3) Parking Structure and Office Building. The office building will be for BWS use. All of these uses are allowed under the property's A-2 Medium Density Apartment zoning.

BOARD OF WATER SUPPLY
BERETANIA COMPLEX REDEVELOPMENT

FINAL ENVIRONMENTAL IMPACT STATEMENT

SEPTEMBER 2020

Prepared For:

Board of Water Supply
City and County of Honolulu

BOARD OF WATER SUPPLY
BERETANIA COMPLEX REDEVELOPMENT

FINAL ENVIRONMENTAL IMPACT STATEMENT

SEPTEMBER 2020

Prepared For:

Board of Water Supply
City and County of Honolulu

ahl.

Prepared By:

HHF PLANNERS
places for people

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A Draft Noise Measurement and Evaluation Report, CENSEO AV+Acoustics, May 31, 2019

B Archaeological Literature Review and Field Inspection Report to support Consultation with the SHPD for the Board of Water Supply Beretania Complex Project, Cultural Surveys Hawai'i, October 2019

BWS Transmittal of LRFI to SHPD, April 24, 2020

B2 Final Report, Archaeological Inventory Survey in Support of the Honolulu Board of Water Supply's Energy Savings Program Contracting (ESPC) Project, Pacific Consulting Services, Inc. July 2017.

C Draft Cultural Impact Assessment, Cultural Surveys Hawai'i, June 2019

D Historic Resources Evaluation for BWS Beretania Complex Modernization, MASON, June 2019

E Market Assessment, Honolulu Board of Water Supply Beretania Campus Redevelopment, Avalon Development, July 2017

F Economic and Fiscal Impact Assessment, Avalon Development, June 24, 2019

G Preliminary Engineering Report, Electrical and Telecommunications Utility Infrastructure, ECS Inc., May 2019

H Preliminary Engineering Report, Civil Infrastructure, Wilson Okamoto Corporation, May 2019

I Traffic Impact Report, Board of Water Supply Beretania Complex Redevelopment, Wilson Okamoto Corporation, May 2019

J Geotechnical Data Report, Masa Fujioka & Associates, 2012.

Acronyms and Abbreviations

ACS	American Community Survey
AIS	Archaeological Inventory Survey
ALS	advanced life support
AMI	area median income
AMP	Archaeological Monitoring Plan
APE	Area of Potential Effect
ASTM	American Society for Testing and Materials
ATA	Austin, Tsutsumi & Associates
BFE	Base Flood Elevation
BMP	Best Management Practice
BTP	burial treatment plan
BWS	Board of Water Supply

C&D	construction and demolition
CAA	Clean Air Act
CCR	Consumer Confidence Report
CFR	Code of Federal Regulations
CIA	Cultural Impact Assessment
CRM	concrete rock masonry
CSH	Cultural Surveys Hawaiʻi, Inc.
CT	census tract
CUP	Conditional Use Permit
CWRM	State Commission on Water Resource Management
CZM	Coastal Zone Management
CZMA	Coastal Zone Management Area
CWA	Clean Water Act
dB	decibel
dBA	Sound pressure level ("A" weighting filter)
DBEDT	State of Hawaiʻi Department of Business, Economic Development and Tourism
DEIS	Draft Environmental Impact Statement
DHHL	Department of Hawaiian Home Lands
DLNR	State of Hawaiʻi Department of Land and Natural Resources
DOE	State of Hawaiʻi Department of Education
DOH	State of Hawaiʻi Department of Health
DPP	Department of Planning and Permitting
EDR	Environmental Data Resources, Inc.
EIS	Environmental Impact Statement
EISPN	Environmental Impact Statement Preparation Notice
EMS	Emergency Medical Services
EMT	Emergency Medical Technicians
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
ESD	Emergency Services Department
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FTA	Federal Transit Administration
FTE	full time equivalent
gpd	Gallons per Day
gpm	Gallons per Minute
HABS	Historic American Building Survey
HAER	Historic American Engineering Record
HALS	Historic American Landscapes Survey
HAR	Hawaiʻi Administrative Rules
HECO	Hawaiian Electric Company
HFD	Honolulu Fire Department
HDOT	State of Hawaiʻi Department of Transportation
HPD	Honolulu Police Department
HRHP	Hawaiʻi Register of Historic Places
HRS	Hawaiʻi Revised Statutes
HRS	Hawaiʻi Revised Statutes
HUD	U.S. Department of Housing and Urban Development
HT	Hawaiian Telcom
IBC	International Building Code

ITE	Institute of Traffic Engineers
kV	kilovolt
Ldn	day-night average sound level
LEED	Leadership in Energy and Environmental Design
$L_{eq(h)}$	Maximum hourly equivalent sound levels
LID	low impact development
LIHTC	low income housing tax credit
LOS	Level-of-Service
LRFI	Literature Review and Field Inspection
LSB	Land Study Bureau
LUC	Land Use Commission
LUO	Land Use Ordinance
MASON	Mason Architects, Inc.
MEP	maximum extent practicable
MICT	Mobile Intensive Care Technician
MEP	maximum extent practicable
MFA	Masa Fujioka & Associates
mgd	million gallons per day
mph	miles per hour
MSL	mean seal level
NAAQS	National Ambient Air Quality Standards
NAC	Noise Abatement Criteria
NEHRP	National Earthquake Hazard Reduction Program
NHO	Native Hawaiian Organization
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Services
NRHP	National Register of Historic Places
OEQC	Office of Environmental Quality Control
OHA	Office of Hawaiian Affairs
OIBC	Oʻahu Island Burial Council
PER	Preliminary Engineering Report
PIM	Public Infrastructure Map
POB	Physician's Office Building
PRU	Plan Review Use
PUC	Primary Urban Center
PV	photovoltaic
QMC	Queen's Medical Center
RCRA	Resource Conservation and Recovery Act
RFP	Request for Proposals
ROH	Revised Ordinances of Honolulu
ROW	Right-of-Way
SF	Square Feet or Square Foot
SHPD	State Historic Preservation Division
SIHP	State Inventory of Historic Places
SLR	sea level rise
SLH	Session Laws of Hawaiʻi
SMA	Special Management Area
TCP	traditional cultural properties
TIR	Traffic Impact Report

TMK	Tax Map Key
TNM	Traffic Noise Model
UH	University of Hawaiʻi
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tank
WQV	water quality volume
WWTP	Wastewater Treatment Plan
XTEZ	Extreme Tsunami Evacuation Zone

1.0 INTRODUCTION

This Final Environmental Impact Statement (FEIS) was prepared in accordance with the requirements of Chapter 343, Hawaiʻi Revised Statutes (HRS) and Chapter 200 of Title 11, Hawaiʻi Administrative Rules (HAR). It supports a proposal by the Board of Water Supply, City and County of Honolulu (BWS) to issue a Request for Proposal(s) (RFP) to redevelop a portion of its Beretania property located at 630 South Beretania Street, Honolulu, Hawaiʻi. This HRS 343 environmental review is required due to the use of public land and funds.

1.1 Project Summary

Project Name:	Board of Water Supply Beretania Complex Redevelopment	
Project Location:	Waikīkī Ahupuaʻa, Kona District, Island of Oʻahu, Hawaiʻi	
Applicant/Owner:	Board of Water Supply, City and County of Honolulu (BWS)	
Accepting Authority:	Kirk Caldwell, Mayor, City and County of Honolulu	
Tax Map Key:	[1] 2-1-036: 001, 004, & 005	
Project Area:	[1] 2-1-036: 001	22,980 square feet (SF)
	[1] 2-1-036: 005 (portion)	105,072 SF
	Total Project Area	128,052 SF
	say	**128,100 SF**
Existing Uses:	***BWS Beretania Complex***: Offices for executive, support, engineering, administrative and operations functions and open parking in support of BWS operations. BWS buildings include Public Service Building, Engineering Building, and Pump Building.	
	Project Area: surface parking lots	
Proposed Use:	Proposed uses in Project Area to be determined by developer, but may include: new BWS office building; parking structure(s); assisted care living facility; affordable senior rental apartments. New buildings may be up to 10 stories in height.	
	Existing BWS Public Service Building, Engineering Building, and Pump Building will remain, and no change in operation is proposed.	
Proposed Action:	BWS will issue a Request for Proposals (RFP) to redevelop a 128,100 SF area within the 6.3-acre BWS Beretania Complex. BWS will enter into a development contract and ground lease with the selected developer for a portion of the Beretania Complex. The Project Area	

is currently being used as ground level parking for employees and staff vehicles.

Land Use Designations:

State Land Use District: Urban (see Figure 5-1)

Primary Urban Center Development Plan: Institutional (see Figure 5-2)

Zoning: A-2, Medium Density Apartment (see Figure 5-3)

Special District: Hawai‘i Capital Special District (see Figure 5-4)

Special Management Area (SMA): Not in SMA

Flood Zone Designation: Zone X (Areas determined to be outside the 1% and 2% annual chance floodplain)

Permits Required:

State of Hawai‘i

Department of Health

- National Pollutant Discharge Elimination System (NPDES) Permit
- Construction Noise Permit

Department of Land and Natural Resources, State Historic Preservation Division

- Historic Preservation Review, Chapter 6E, HRS

City and County of Honolulu

Department of Planning and Permitting (DPP)

- Special District Permit (Major)
- Conditional Use Permit (CUP)-Major (for Scenario 1, Assisted Care Living Facility); CUP-Minor (for Scenario 3, Parking)
- Primary Urban Center (PUC) Development Plan (DP) Public Infrastructure Map (PIM) revision (to add “Government Building Modification” PIM symbol)[1]
- Grading, grubbing, and stockpiling permits
- Building permits

Chapter 343, HRS Determination: BWS has determined at the outset that the Proposed Action requires the preparation of an environmental impact statement (EIS), based on the significance criteria set forth in Chapter 200, Title 11, State of Hawai‘i Department of Health. The Proposed Action involves the use of public lands and funds and may meet the criteria for “curtails the range of beneficial uses of the environment,” and it may involve “substantial secondary impacts…such as effects on public facilities.” (HAR §11-200-13).

[1] Per Memo dated August 9, 2018 from City and County of Honolulu Department of Planning and Permitting to BWS; Subject: BWS FY2018-2019 Capital Improvements Program (CIP) Budget

1.2 Applicant/Owner

The Board of Water Supply (BWS), City and County of Honolulu, will be the applicant/owner and project proponent.

Contact:
Ernest Y. W. Lau, P.E., Manager and Chief Engineer
Board of Water Supply
630 South Beretania Street
Honolulu, Hawaii 96843
Phone: (808) 748-5061
Email: bwsredevelopmenteis@hhf.com

1.3 Accepting Authority

The Mayor, City and County of Honolulu, is the accepting authority for the EIS.

Contact:
Mayor Kirk Caldwell
City and County of Honolulu
c/o Board of Water Supply
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1.4 Environmental Planning Consultant

HHF Planners is the Applicant's environmental planning consultant.

Contact:
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1.5 Compliance with Hawaiʻi Environmental Review Laws

This Final Environmental Impact Statement (FEIS) was prepared in accordance with the requirements of Hawaiʻi Revised Statutes (HRS) §343 and Chapter 200 of Title 11, Hawaiʻi Administrative Rules (HAR). This HRS 343 environmental review is required due to the project's proposed use of City and County of Honolulu lands, an action which triggers an environmental assessment under HRS §343-5(a)(1).

Act 172, Session Laws of Hawaiʻi (SLH) signed by the Governor on June 27, 2012 (Act 172 [12]), allows an agency to determine from the outset that the project may have a "significant impact" and an Environmental Impact Statement (EIS) is likely to be required. The applicant may then proceed

directly to prepare the EIS. The determination of whether the project will likely have a significant impact is measured by the significance criteria under §11-200-12(b) of the HAR.

The Proposed Action by the BWS is to issue a Request for Proposals (RFP) and enter into a contract with a selected developer to redevelop a portion of the BWS Beretania Complex. The redevelopment of the site would change existing ground level parking areas to more intensive uses. Potential use scenarios include 1) assisted care living facility; 2) affordable senior rental apartments; or 3) stand-alone parking structure. Each of these three scenarios would also include a BWS office building. The Proposed Action has the potential to impact cultural resources, curtail the range of beneficial uses of the environment, and affect the economic and social welfare of the community (See HAR §11-200-12(b)(1), (2) and (4), respectively).

Based on its review of the significance criteria, the BWS has determined that the Proposed Action may have a significant effect on the environment and that an EIS should be prepared. An Environmental Impact Statement Preparation Notice (EISPN) was prepared and published in *The Environmental Notice*, the Office of Environmental Quality Control's (OEQC) bimonthly bulletin on November 23, 2018. The 30-day public consultation period ended on December 24, 2018. Comments received were included in the subsequent Draft Environmental Impact Statement (DEIS).

The DEIS was prepared and published in *The Environmental Notice* on May 23, 2020. The 45-day public consultation period ended on July 7, 2020. Chapter 9 of this FEIS includes the comments received during the EISPN and DEIS comment periods, and responses to the comments.

1.6 Studies Contributing to this FEIS

The information in this document has been obtained from site visits, print and online reference sources, previously completed reports and technical studies, and the following technical studies that were prepared for this Proposed Action. The technical studies are included in the Appendix.

- Noise Measurement and Evaluation Report
- Archaeological Literature Review and Field Inspection
- Cultural Impact Assessment
- Historic Resources Evaluation
- Market Assessment
- Economic and Fiscal Impact Assessment
- Preliminary Engineering Reports, Electrical and Civil Engineering
- Traffic Impact Report

Location Map

Figure 1-1

Board of Water Supply Beretania Complex Redevelopment

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Tax Map Key Map **Figure 1-2**

Board of Water Supply Beretania Complex Redevelopment

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2.0 PROPOSED ACTION AND ALTERNATIVES

2.1 Background

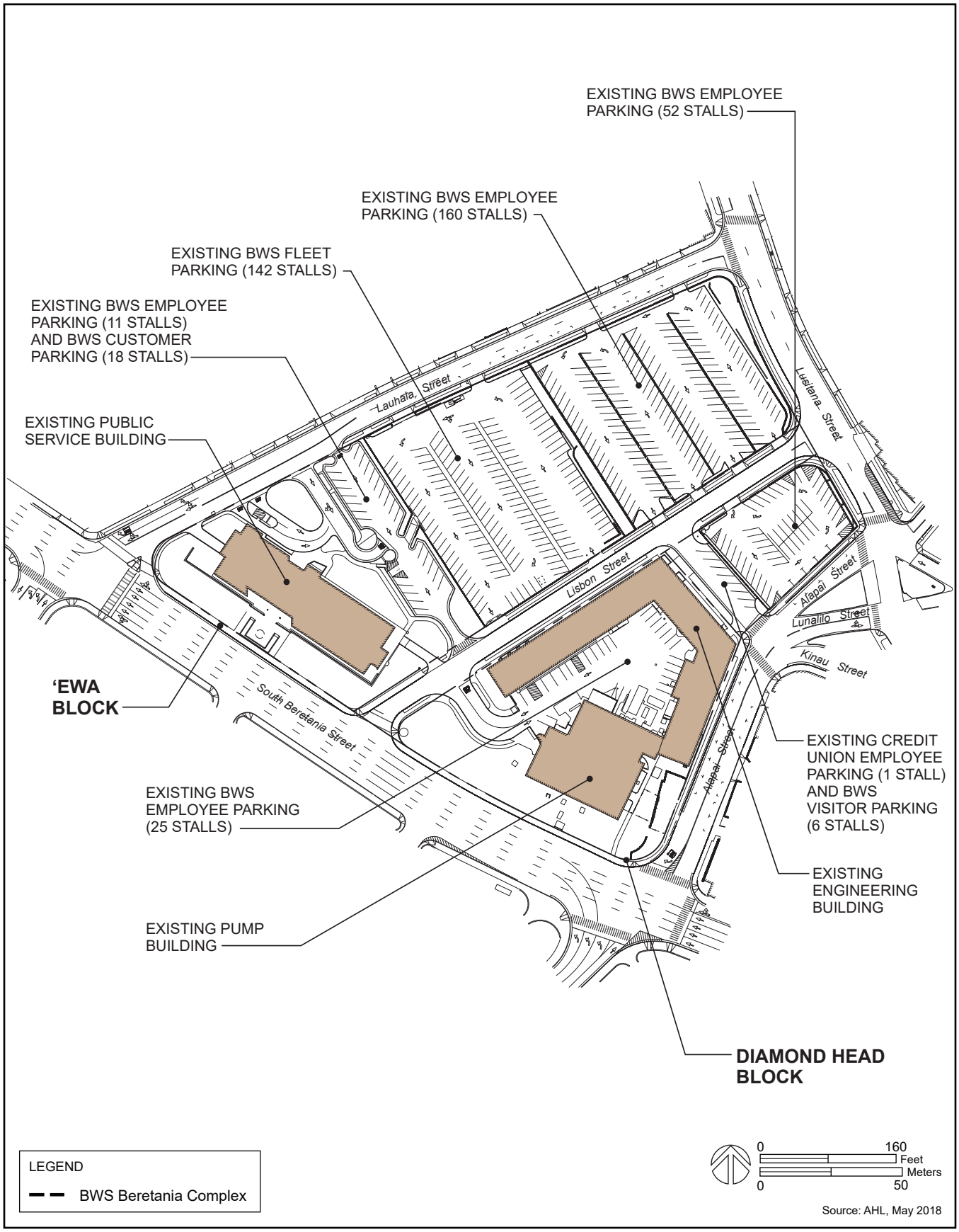
The Board of Water Supply (BWS) was created in 1929 by Act 96 of the Hawaiʻi Territorial Legislature. With the passage of Act 96, the planning and management of the existing water system was turned over to the newly created agency. BWS was designed to be semi-autonomous and self-supporting with the authority to charge for water usage to support its capital improvement and operating expenses, and to set long term plans for Oʻahu's future water needs. BWS does not receive or request property or other County taxes or fees to manage and operate the water system. However, low interest loans from the State Revolving Fund are utilized to construct select capital improvement projects. The BWS mission is to provide Oʻahu water users with a safe, dependable, and affordable drinking water supply now and into the future (BWS 2018). BWS currently supplies approximately 145 million gallons of water per day to one million people within the City and County of Honolulu (BWS 2016).

BWS is governed by a seven-member Board, five of whom are nominated by the Mayor and approved by the Honolulu City Council. The Director of the State of Hawaiʻi Department of Transportation and Chief Engineer of the City Department of Facility Maintenance serve as ex-officio members of the Board. The Board sets policy for the BWS and appoints the Manager and Chief Engineer, who is responsible to administer the water department and its operation.

2.1.1 EXISTING LAND USE

The Beretania Complex is the primary center of operations for the BWS and contains the majority of its executive, support, engineering, and administrative functions. The Beretania Complex is made up of two property blocks: the Ewa Block and the Diamond Head Block, separated by Lisbon Street, which is not part of the Project Area. There are three major existing facilities within the Beretania Complex: 1) Public Service Building; 2) Engineering Building; and 3) Pump Building (Figure 2-1). These buildings are described in detail in the Historic Resources Evaluation conducted by Mason Architects, Inc. (Appendix D) and in Section 4.5 (Historic Architecture) of this Final Environmental Impact Statement (FEIS). These buildings are not part of the Project Area proposed for redevelopment, which is limited to areas that are currently used for ground level parking.

The Public Service Building, which was constructed in 1957, is located on the Ewa Block fronting Beretania Street. This building is recognizable by its unique façade and water fountain located prominently at the building entrance, with the inscription "Uwe Ka Lani Ola Ka Honua," which means "When the heavens weep, the earth lives." The building is surrounded by a grassy lawn with tall coconut palms and neatly trimmed hedges. Behind the building is a parking lot for customers and staff, shaded by several large rainbow shower and monkeypod trees. The Project Area begins beyond this parking lot and extends northeast to Lusitana Street. The Project Area comprises the majority of the Ewa Block. It is currently taken up by three stepped parking lots which date to 1959. These fenced lots have a total of 331 stalls and are used for BWS fleet vehicle and employee parking.



Existing Land Use **Figure 2-1**

Board of Water Supply Beretania Complex Redevelopment

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The existing BWS Pump Building (constructed in 1927) and Engineering Building (constructed in 1939) are located on the *makai* portion of the Diamond Head Block. An elevated walkway crosses Lisbon Street, connecting the U-shaped Engineering Building to the Public Service Building on the Ewa Block. The three-story, concrete Engineering Building houses BWS employees who are responsible for planning and operating all the water system facilities.

A one-way access road is located immediately behind the Engineering Building and includes seven diagonal parking stalls used for employee and visitor parking. The Project Area on the Diamond Head Block includes the parking lot just above this access road, extending to Lusitana Street. The Diamond Head Block has two parking areas with a total of 60 stalls, and a 25-stall parking area formed by the U-shape of the Engineering Building. Rock retaining walls, some predating the existing structures, are found both within and surrounding the parking areas.

The Pump Building is also located on the Diamond Head Block, fronting Beretania Street. It is one of the oldest structures in the Beretania Complex, and one of 81 pumping stations operated by BWS on Oʻahu. The land underlying the Pump Building, TMK (1) 2-1-036:004, is owned by the State of Hawaiʻi, and is not part of the Project Area. This area was set aside for the City by the Governor of the Territory of Hawaiʻi by Executive Order 107 in 1921. The Executive Order was subsequently amended by Executive Order 785 in 1947. This area is limited to use as a pump station and municipal garage, unless otherwise approved by the State of Hawaiʻi.

A subterranean World War II bomb shelter tunnel system is located to the north of the Engineering Building, mostly beneath the employee/visitor parking area and driveway between Alapaʻi and Lisbon Streets.

2.1.2 PAST LAND USE

The area surrounding Honolulu Harbor that is presently downtown Honolulu was known to the Hawaiians as "Kou," and was a center of population and activity. The primary center of pre-Contact population and agriculture in Honolulu was the coastline and lands surrounding Nuʻuanu Stream (CSH, 2019). The current Project Area was probably considered to be part of the *ahupuaʻa* of Nuʻuanu and Pauoa. By the mid-1800s, westerners had arrived and land use in the Honolulu area had shifted from traditional agriculture to maritime trade. The native Hawaiian population in the Honolulu and Waikīkī areas had become decimated by disease, the demands on labor for the sandalwood trade, and other factors.

Traditional land divisions of the fifteenth and sixteenth centuries persisted until the Māhele (1848), which introduced private property into Hawaiian society. Historical records show that by 1912, the project area was divided into multiple small regularly shaped land grant parcels known as the ʻAuwaiolimu Lots, which were leased or sold to private individuals over the next few decades (Pacific Consulting Services, Inc. 2017).

By the end of the nineteenth century, city water sources were insufficient for the growing Honolulu population. As a solution, pumping stations and inland reservoirs were planned by the Minister of the Interior to the Monarchy. In 1894, a pumping station, along with two drilled wells, were constructed at the Beretania Complex at the corner of Beretania and Alapaʻi Streets. The pumping station connected to a storage reservoir on the slope of Punchbowl. The extant pumping station replaced the original brick structure in 1927, and in 1939, the BWS Engineering Building was constructed. By 1950, a majority of the residences in the current Beretania Complex site had been removed, and in 1958, the BWS Public Service Building was constructed fronting Beretania Street.

The public service building is connected to the Engineering Building by an elevated footbridge across Lisbon Street (Pacific Consulting Services, Inc. 2017).

2.2 Purpose and Need for Action

The primary purpose of the Proposed Action, the redevelopment of a portion of the Beretania Complex through a lease agreement, is to provide a revenue stream for BWS. The revenue stream will help offset a portion of operating and capital improvement costs. Underutilized land currently used for ground level parking will be converted to a revenue-generating use to help BWS sustain its ongoing operations and capital improvement program. With the redevelopment, BWS would maximize use of the Beretania Complex.

This FEIS evaluates several potential development scenarios that are likely given the site's A-2 Apartment District (Medium Density Apartment) zoning and current market conditions. Although the final plan will be determined by the selected developer, there is a need for all of the potential uses.

One component included in all the development scenarios is a new BWS office building. This is needed to provide additional and more efficient office and administrative facilities for BWS.

The redevelopment of the Beretania Complex can also meet the need for senior rental housing and/or assisted care living targeted to Honolulu's growing older adult population. Over the years, Honolulu has experienced soaring home ownership and rental prices, a shortfall of rental inventory, and very little new inventory other than that marketed to the higher income market. The National Housing Conference's 2017 edition of its Paycheck to Paycheck database shows that of 203 metro areas nationwide, Honolulu was the fourth most expensive market for renters, with average fair market rent (2016) of $1,982 (for a 2-bedroom home). The annual income required to afford this fair market rent was $79,280 (National Housing Conference, 2018).

The cost of living in Honolulu is 16 percent higher than the national average, severely impacting limited and low-income seniors. Between 2010 and 2040, the number of people age 65 years and older in the City and County of Honolulu is projected to increase by 104 percent. By 2040, 27 percent of Honolulu residents will be aged 65 and older. On Oʻahu, affordable senior apartments occupancy rates are currently low, below 1 percent (Avalon 2017).

The project provides a rare opportunity to construct new housing targeted to the growing older adult demographic. The A-2 Medium Density Apartment zoning designation is intended to provide areas for medium density, multi-family dwellings. Assisted care living and/or affordable senior rental apartments are uses that are compatible with the existing land designation. On Oʻahu, assisted care living vacancy rates are currently below 14 percent. Historically, over the last 20 years, vacancy rates for these facilities have fluctuated between 7 and 10 percent. Currently, some facilities have wait lists as long as three years for prospective residents.

Construction of senior rental housing or assisted care living could increase the housing inventory in a centrally located area. The proximity to the Queen's Medical Center (and to a lesser extent, the Straub Medical Clinic and Hospital) creates synergy between housing and medical support services, a benefit to future residents and health care providers.

Options that provide additional parking to serve surrounding government offices will also meet an existing need expressed by various State of Hawaiʻi and City and County of Honolulu agencies.

2.3 Description of Proposed Action

Under the Proposed Action, BWS will issue a Request for Proposals (RFP) for redevelopment of a portion of the Beretania Complex. The Project Area does not include the existing BWS Public Service Building, Engineering Building, and Pump Station Building. The selected developer will be issued a ground lease for the use of the Project Area, and will be allowed to redevelop the Project Area, subject to the conditions of the lease. The maximum lease term shall be sixty-five (65) years. At the end of the lease term, full ownership and control over the property and improvements constructed shall revert to BWS.

The specific redevelopment plan will be determined by the lessee. The FEIS evaluates three potential development scenarios, all of which could be implemented under existing zoning and that appear to be supported by market conditions. The scenarios, illustrated in Figures 4, 5 and 6 are:

- Scenario 1: Assisted Care Living Facility and Office Building
- Scenario 2: Affordable Senior Rental Apartments and Office Building
- Scenario 3:Parking Structure and Office Building

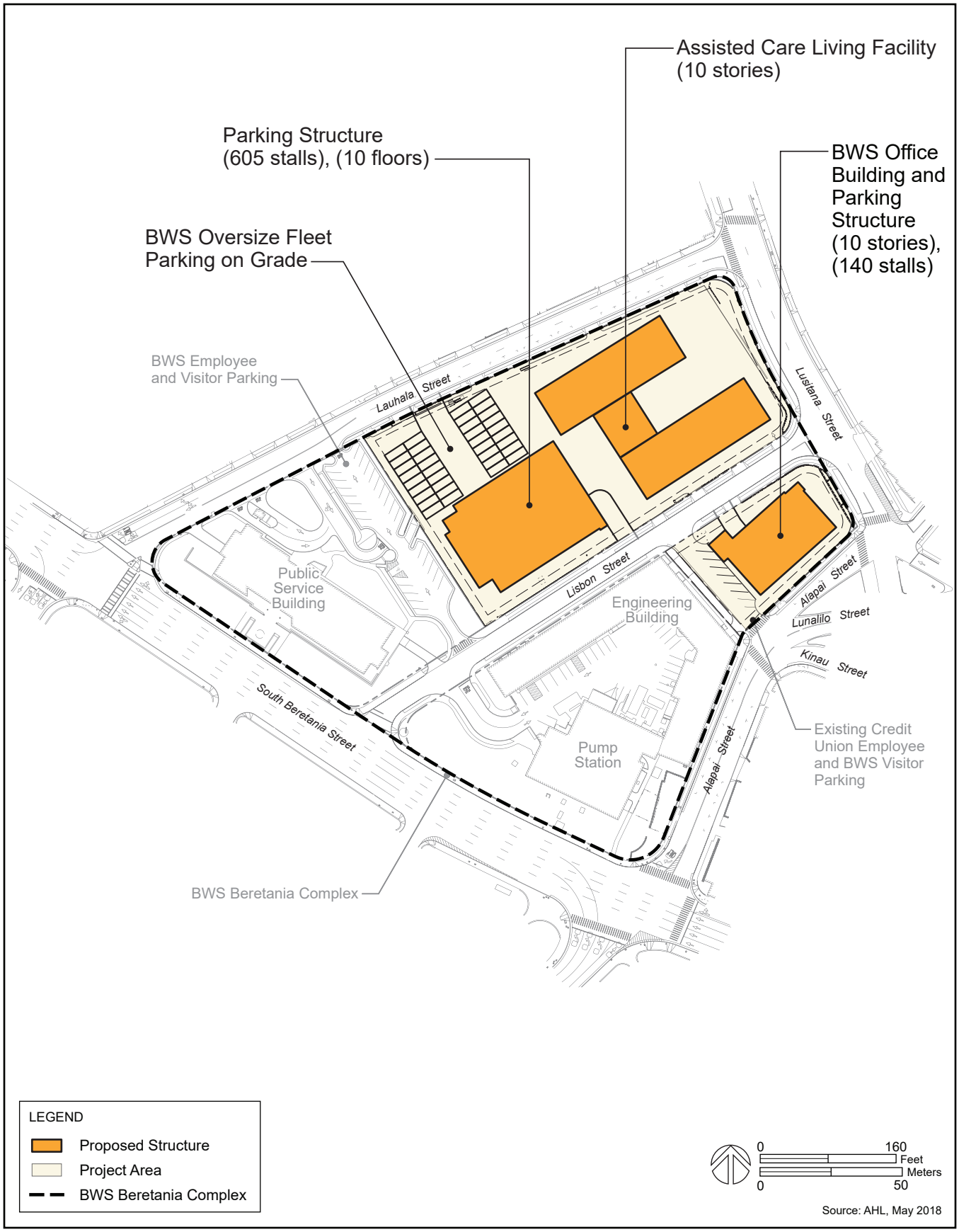
All three scenarios propose a new BWS office building (10 stories), including several stories of parking, near the corner of Lusitana Street and Alapaʻi Street. While all scenarios show the BWS office building in this mauka corner, there is no requirement to be at this specific location. The selected developer will be given the flexibility to meet the BWS need for office space elsewhere on site.

All scenarios show a multi-level parking structure between Lisbon and Lauhala Streets. This structure will replace lost ground level parking and support the proposed residential uses (Scenarios 1 and 2). The number of parking stalls varies by scenario.

It should be noted that the three scenarios presented do not preclude other development scenarios that may be proposed by the developer selected via the RFP process. These other scenarios may require preparation of a separate or supplemental EIS.

2.3.1 SCENARIO 1: ASSISTED CARE LIVING FACILITY AND OFFICE BUILDING

The main component of Scenario 1 (Figure 2-2) is an assisted living facility located in the northwest corner of the property. Assisted living is a form of residential care for seniors that provides residents with as much independence as they want, but with available personal care and support services. Assisted living communities offer residents assistance with everyday activities such as meals, medication management, bathing, grooming, dressing, and transportation. They include common areas for activities, while allowing residents to age in place. Unlike nursing homes, assisted living communities do not offer complex medical services, and are considered non-medical facilities.



Scenario 1: Assisted Care Living Facility and Office Building **Figure 2-2**

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The City and County of Honolulu's Land Use Ordinance (LUO) Master Land Use Table indicates that "Special needs housing for the elderly" is allowed in the A-2 Medium Density Apartment zoning district (A-2 zoning) with a Conditional Use Permit (CUP)-Major. According to the City's Department of Planning and Permitting (DPP), the processing time for a CUP-Major is 90 calendar days from DPP acceptance of a completed application. A presentation to the local Neighborhood Board is required.

The concept plan in Figure 2-2 shows an assisted living facility with 10 floors totaling 251,000 SF. It is likely that the ground floor and portion of the second floor would be used for amenities and utilities. Upper floors would consist of living units and an activity room on each floor. Parking for employees, residents, and guests of the assisted living facility would be provided in the adjacent 10-floor parking structure, which will include a total of 605 stalls; 248 stalls for BWS and the remainder for the assisted living residents, visitors and employees. There will also be up to 218 parking stalls available for lease.

Scenario 1 will also include a new BWS office building located at the northeast corner of the Beretania Complex, near the intersection of Lusitana Street and Alapaʻi Street. The office building will be 10 stories high, including several stories of parking, plus one story of parking below grade.

2.3.2 SCENARIO 2: AFFORDABLE SENIOR RENTAL APARTMENTS AND OFFICE BUILDING

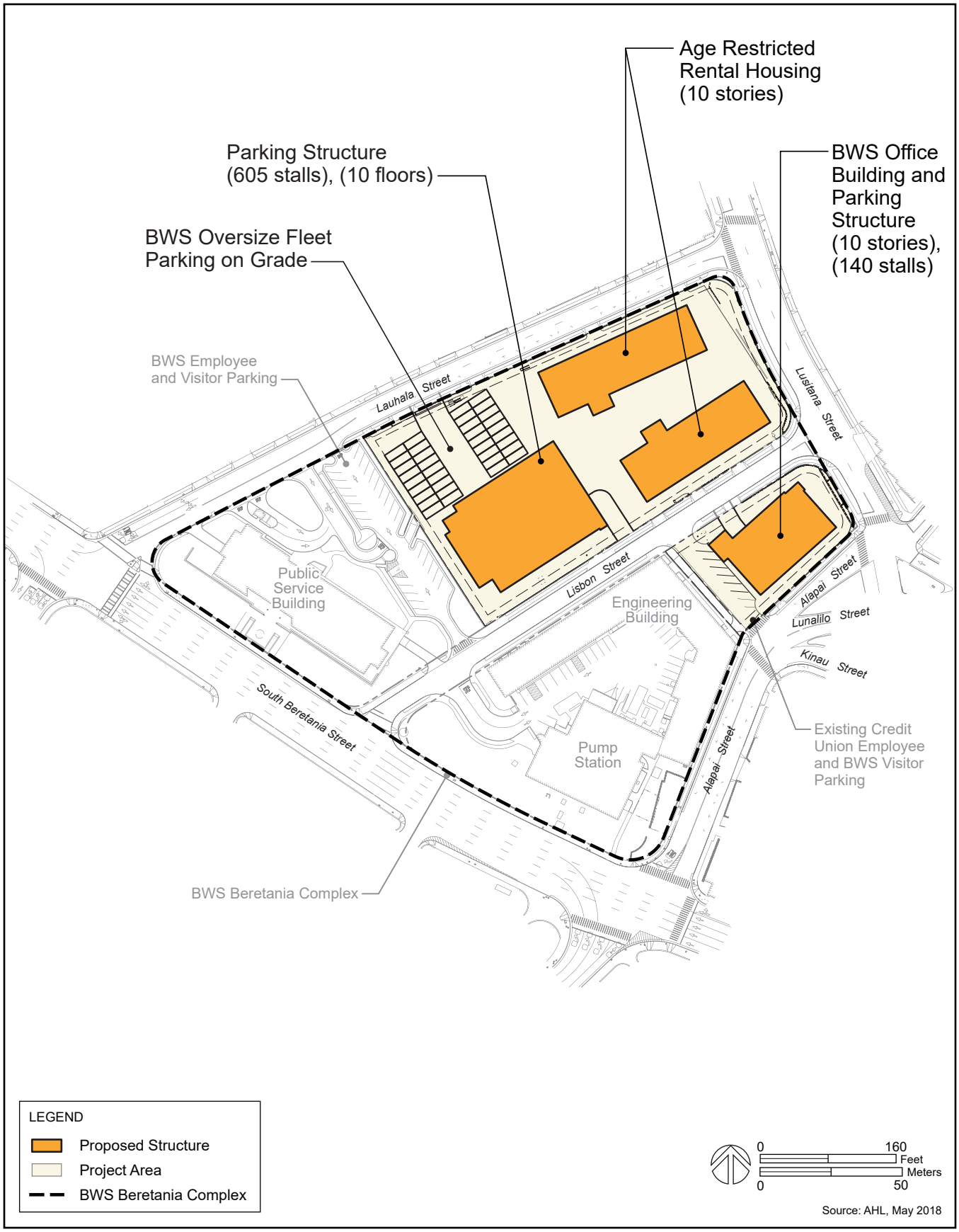
Scenario 2 (Figure 2-3) includes the development of senior rental apartments in the northwestern corner of the Beretania Complex. These would be rent-controlled apartments for individuals 60 years and older. In contrast to the assisted living scenario, there would be no on-site support services for residents, other than standard building security and maintenance. Senior rental apartments are considered a multifamily dwelling and are a permitted use in the A-2 Medium Density Apartment District.

The concept plan shows the building footprint for two 10-story apartments. The building floor area will total 248,300 SF. The ground floor and portion of the second floor of each building would most likely be used for amenities and utilities. Residential units would be located on the upper floors. Similar to the Assisted Living Facility option, parking for residents and visitors would be provided in the adjacent 10-floor, parking structure which will include a total of 605 stalls; 248 stalls for BWS with the remainder for residents and visitors. There will also be up to 247 parking stalls available for lease.

Scenario 2 will also include a new BWS office building located at the northeast corner of the Beretania Complex, near the intersection of Lusitana Street and Alapaʻi Street. The office building will be 10 stories high, including several stories of parking, plus one story of parking below grade.

2.3.3 SCENARIO 3: PARKING STRUCTURE AND OFFICE BUILDING

Under Scenario 3 (Figure 2-4), there would be no residential component on the property. The northwest corner of the property, near the intersection of Lauhala and Lusitana Streets, will remain as ground level parking. The proposed parking structure off Lauhala Street will be 10 floors but larger in footprint, with a total of 1,155 parking stalls. Approximately 178 stalls will be reserved for BWS use and the remainder will be available for lease.



Scenario 2: Affordable Senior Rental Apartments and Office Building **Figure 2-3**

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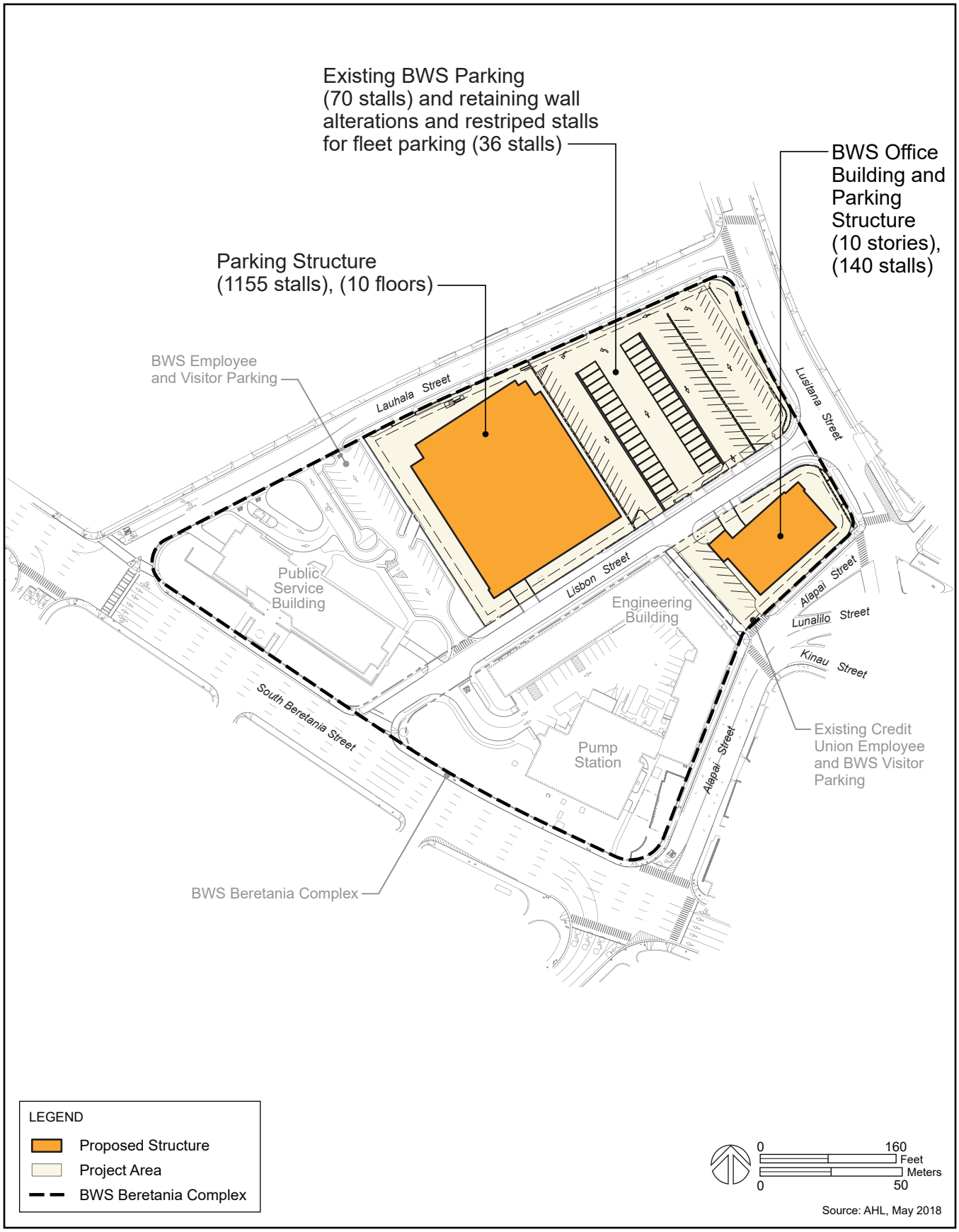

Scenario 3: Parking Structure and Office Building **Figure 2-4**

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Development of a stand-alone parking structure would be considered a public use, as many of the spaces in the parking structure would be for government employees and the revenue from renting other parking spaces would underwrite BWS operating expenses. Public uses are allowed in all zoning districts.

Scenario 3 will also include a new BWS office building located at the northeast corner of the Beretania Complex, near the intersection of Lusitana Street and Alapaʻi Street. The office building will be 10 stories high, including several stories of parking, plus one story of parking below grade.

2.4 Alternatives Considered

2.4.1 NO ACTION

Under a No Action alternative, BWS would not issue an RFP for the redevelopment of its Beretania Complex. Existing facilities on the site would continue operating in support of BWS, but no new construction would occur. Areas of the site not occupied by existing BWS buildings would continue to be used for open air parking. No senior rental housing, assisted living, or additional office space would be provided. Under the No Action alternative, BWS would not have a supplemental source of revenue.

2.4.2 OTHER POTENTIAL USES

The following are other potential uses allowed in the A-2 Medium Density Apartment District.

2.4.2.1 GOVERNMENT/PUBLIC USE BUILDING

Government offices and public uses and structures are an allowed use in the existing A-2 zoning district. The Beretania Complex is suitable for government offices given its location in the Hawaiʻi Capital Special District and that it is within walking distance to the State Capitol, Honolulu Hale, Frank F. Fasi Municipal Building, Honolulu Police Department, and other government buildings.

However, there are market challenges to a private developer constructing new office space at the Beretania Complex. Current market office rents do not support the development of new office product (Avalon, 2017). Therefore, any new development of office space at the Beretania Complex would likely require significant guarantees to lenders by developers and/or public agencies.

Because the new office space could only be leased to government agencies, the sponsoring public agencies would need to provide the developer (and lender) with an "exit" at a certain return. That is, the government will have to "buy out" the developer or provide some guarantee of leasing the space for an extended period of time at a certain rate, in order to provide the developer a satisfactory return.

2.4.2.2 EXPANSION OF QUEEN'S MEDICAL CENTER

In the past, the Queen's Medical Center (QMC) has expressed an interest in leasing a portion of the Beretania Complex for the expansion of its medical campus. An expansion of the medical center in an area with A-2 zoning would require a Plan Review Use (PRU) process with the City's Department of Planning and Permitting. A PRU is typically required for expansion of an institutional use such as a hospital, college or university, airport, or convention center. It is intended to be a review and

approval mechanism for major institutional uses to ensure that their expansion and development is compatible with, and does not have major adverse impact on, surrounding land uses.

Should the project area be developed as part of the QMC campus, the PRU process could take 12 months or longer to complete. QMC has recently expanded its facilities at the Hawai‘i Medical Center West in West O‘ahu, and their interest in further expansion of their Honolulu campus is uncertain.

2.4.2.3 LEASEHOLD CONDOMINIUMS

The development of leasehold residential condominiums is another development option. In a leasehold situation, the land and the improvements on it (i.e., the residential units) have different owners, and the homeowner, or “lessee,” purchases the condo unit and pays a monthly lease fee to the lessor for the rights to use the land. In this case, BWS would retain ownership of the property throughout the lease term.

While the number of leasehold single family properties on O‘ahu have declined over the years, there are still a number of leasehold condominiums, mostly in urban areas of Honolulu. According to the Honolulu Board of Realtors, while less than 2 percent of single-family homes on the market are leasehold, leasehold offerings represent about 12 percent of the condos on the market (Berger, 2014). As a multi-family residential use, leasehold condominiums would be allowed under the existing A-2 zoning. It is unknown whether there is a sufficient market demand for leasehold condominiums and/or whether a third-party developer would find it financially feasible to develop such a housing product.

From a market perspective, buyers prefer to avoid leasehold residential condominiums as it presents uncertainty in the future with lease renegotiations. This occurred in the early 1990's, when many leasehold residential units experienced significant increases in land values and associated ground rent. That memory has not faded from the public’s mind. The one exception to this is the market for luxury ocean-side leasehold residential units, which have continued to sell, primarily to high net-worth retirees and empty nesters. These individuals desire, and can afford to pay a premium for location, view, and amenities, and are less concerned about the investment over the long term.

2.4.3 REZONE THE SITE TO BMX-3

Scenarios 1, 2 and 3 and the development options presented in Section 2.4.2 above are allowed under the existing A-2 zoning (although in some cases requiring a CUP). That said, the RFP will not preclude the selected developer from rezoning the property to BMX-3, Community Business Mixed Use District. This zoning designation could increase the range of development possibilities for the property.

According to the City’s Land Use Ordinance, the purpose of business mixed use districts is to recognize that certain areas of the city have historically been mixtures of commercial and residential uses, occurring vertically and horizontally and to encourage the continuance and strengthening of this pattern. It is the intent to provide residences in close proximity to employment and retail (Section 21-3.120).

The intent of the BMX-3 community business mixed use district is to *“provide areas for both commercial and residential uses outside the of the central business mixed use district. It is intended*

that this district be applied to areas where the existing land use pattern is already a mixture of commercial and residential uses, occurring horizontally, vertically, or both" (Section 21-3.120 (b)).

The BMX-3 Community Business Mixed Use District would allow a range of commercial, dining, business, and office uses not permitted in the A-2 district. For example, it would allow medically related businesses such as labs, clinics, and offices that could compliment the adjacent QMC campus. Similar to the A-2 district, residential uses such as affordable senior rentals could still be included. Uses such as assisted care living and special needs housing would be allowed with a CUP.

The primary disadvantage of this alternative is the effort and time it would take to complete the rezoning process, which can take from 9 to 12 months. It would also require a Development Plan amendment prior to the zone change, which could add significant time (more than a year) to entitlement.

The City's Primary Urban Center (PUC) Development Plan currently designates the BWS Beretania Complex and much of the surrounding lands as "Institutional." Institutional land typically supports governmental or public functions, such as government offices, schools, and public utilities. A request for zone change would likely trigger the requirement for a Development Plan amendment. The PUC DP is currently being updated by the City. If a zone change is contemplated, coordination with the City Department of Planning and Permitting to determine DP consistency and a potential DP amendment should occur as soon as possible.

2.4.4 SELL THE BERETANIA COMPLEX PROPERTY

Rather than lease the property, a revenue-generating alternative is the outright sale of all or a portion of the Beretania Complex. The property sale could result in a large cash infusion, which could sustain BWS operations into the future. If the entire Beretania Complex (with the exception of the Pump Building) were sold, a condition of the sale would be the ability for BWS to lease back its facilities on the site and to continue its operations in perpetuity.

This option was not considered to be a realistic or viable alternative. It has been estimated that the cost to purchase land and construct replacement office space for a BWS relocation to Kapolei would be approximately $143.5 million. By comparison, the value of the Beretania Complex is approximately $41.2 million

Moreover, sale of the Beretania Complex fails to conform to the BWS's Strategic Plan for 2018-2022, which specifically calls for developing other sources of revenue through execution of a RFP for the Beretania Complex. The Beretania Complex contains an active pump station and other major engineering components of the water system. Transferring control of the property to a non-governmental entity would likely conflict with BWS's Capital Improvement Program. In the long term, a land sale could jeopardize the BWS mission to provide safe, dependable and affordable drinking water now and into the future. Thus, the sale of the Beretania Complex property was eliminated from consideration.

3.0 NATURAL AND PHYSICAL ENVIRONMENT

3.1 Climate

3.1.1 EXISTING CONDITIONS

3.1.1.1 CLIMATE

The Project Area is located in downtown Honolulu, which has a mild climate year round. The climate of the Honolulu area is typical of the leeward coastal lowlands of Oʻahu, and characterized by abundant sunshine, persistent tradewinds, relatively constant temperatures, moderate humidity, and infrequent severe storms. Temperatures around Honolulu range from 52 to 95 degrees Fahrenheit, with the warmest temperatures in September and the coolest temperatures in January. Annual average rainfall ranges between 20 to 30 inches. Northeasterly tradewinds prevail throughout the year although its frequency varies from more than 90 percent during the summer months to 50 percent in January. The average annual wind velocity is approximately 10 miles per hour.

3.1.1.2 CLIMATE CHANGE

On July 16, 2018, Honolulu Mayor Kirk Caldwell issued an Executive Order on climate change and sea level rise in response to guidance issued by the City's Climate Change Commission. The directive establishes policies to address, minimize risks from, and adapt to the impacts of climate change and sea level rise. Each City department and agency, including BWS, is required to consider the need for climate change mitigation and adaptation, reduce greenhouse gas emissions, and adapt to impacts caused by sea level rise (SLR). The City's Sea Level Rise Guidance suggested using the widely accepted planning benchmark of 3.2 feet of sea level rise by mid-century (City and County of Honolulu, 2018).

Climate change is a long-term shift in patterns of temperature, precipitation, humidity, wind and seasons. Scientific data show that Earth's climate has been warming, which is largely attributed to rising levels of carbon dioxide and other "greenhouse gases" generated by human activity. These changes are already impacting Hawaiʻi and the Pacific Islands through rising sea levels, increasing ocean acidity, changing rainfall patterns, decreasing stream flows, and changing wind and wave patterns.

Sea level is rising and increasing due to global warming of the atmosphere and oceans and melting the glaciers and ice sheets. Sea level has been increasing in Hawaiʻi at about 0.06 inches per year (6 inches per century). Although this may not appear to be a rapid increase, its cumulative effects year after year can quickly add up. For example, 70% of Hawaiʻi's beaches have been classified as chronically eroding, due in part to long-term sea level rise. Sea level rise causes beach erosion, flooding during high tide, and increases the vulnerability to low lying coastal communities from flooding due to storm surge and tsunamis. Sea level is expected to continue rising, perhaps by more than 3 feet by the end of this century (Pacific Islands Climate Education Partnership, 2016).

3.1.2 POTENTIAL IMPACTS AND MITIGATION

The Project Area is within a highly developed urban area of Honolulu. It is not near the coast or vulnerable to coastal erosion, nor susceptible to stream flooding or inundation that may occur as a

result of long-term climate change. The Beretania Complex Project Area is not within the area that the City has identified as vulnerable to a 3.2-foot sea level rise. That said, the Project Area, as most of Honolulu, will inevitably be affected by the larger regional implications of sea level rise; specifically the need for managed retreat from coastal areas, and future relocation of roads, utilities, and other critical infrastructure and public facilities. The State's 2018 Hazard Mitigation Plan assessed critical facilities located in the "1% Annual Change Coastal Flood Zone with 3.2 Feet of Sea Level Rise" (1%CFZ-3.2). It found that the City and County of Honolulu has 121 critical facilities within the hazard area, with the majority of the facilities being water, waste, and wastewater systems (HI-EMA, 2018).

Like most of Oʻahu, the Project Area is vulnerable to natural hazards such as hurricanes, which may become more frequent as a result of climate change. While the likelihood of storm and hurricane damage is difficult to assess, future land uses will comply with all applicable City and County of Honolulu building codes, which will be enforced at the time building permits are obtained for the redevelopment.

On a microclimate level, the Project Area is currently dominated by asphalt concrete parking lots, which absorb heat and contribute to an urban heat island effect. The proposed buildings could also divert cooling northeast trade winds to some surrounding areas. However, replacement of the existing expanse of asphalt can reduce the heat island effect. Siting and orientation of buildings to maintain wind flow, provision of permeable surfaces, use of light-colored pavements, and inclusion of landscaping can be implemented. Other features that can be incorporated include green building design and sustainable practices, such as photovoltaic panels, energy efficient lighting, and water conserving fixtures and operations. Future senior apartments or assisted care living facility, as well as the new BWS office building, can chose to adopt a robust recycling program similar to the program encouraged for all City agencies.

3.2 Geology, Topography and Soils

3.2.1 EXISTING CONDITIONS

In 2012, Masa Fujioka & Associates (MFA) conducted a subsurface geotechnical investigation in the existing parking lot areas (i.e., current Project Area) in anticipation of BWS preparing RFP documents for the potential redevelopment. The intent was to provide a report of general site conditions, and it was noted that the selected design-build contactor would conduct more project-specific investigation. The discussion below is from MFA's *Geotechnical Data Report*, which is also included as Appendix J.

3.2.1.1 GEOLOGY

Regional Geology

The Island of Oʻahu was formed by two shield volcanoes, the older Waiʻanae and younger Koʻolau, starting approximately 3.9 million years ago. Each volcano has been truncated by massive submarine slides—the Waiʻanae Slump to the southeast and the Nuʻuanu Slide to the northeast. The lavas of the Koʻolau Volcano banked against the Waiʻanae Volcano, creating the Schofield Plateau.

The Waiʻanae Volcanics (i.e., group of volcanoes forming a volcanic field) date from about 4 million years ago (Ma) to about 2.9 Ma. The oldest Koʻolau Basalts are dated to about 3 Ma, and the youngest to somewhere between 1.8 to 2.1 Ma. After a long period of quiet during which deep canyons were cut into the Koʻolau shield, volcanic activity resumed on the southeastern end of the

Koʻolau Range, consisting of the sporadically scattered lava flows and vent deposits of the Honolulu Volcanics. The Honolulu Volcanics are a late stage of volcanism, known as the rejuvenated stage, which occurred after the main stage that built the Koʻolau volcano. This group of volcanoes includes Diamond Head, Tantalus Peak and Punchbowl Crater, and range in age from 0.8 to "somewhat younger than" 0.1 Ma. One of the youngest deposits is from the Tantalus Peak-Sugar Loaf vent system. Tantalus Peak is about three miles northeast of the Project Area, and Sugar Loaf, which consists of two craters, is about a mile south of Tantalus on the divide between the Mānoa and Makiki valleys.

Oʻahu's geologic history includes a deep (>1200 feet), gradual, submergence of Oʻahu, possibly in the Early Pleistocene era. This is the result of deformation of the Earth's crust caused by the island's load on it, and oscillations of sea level, attributable to advances and recessions of the polar ice caps. The variations in sea level, or stands, varied from 95 feet above present sea level (Kaʻena Stand); recession to +70 feet (Lāʻie Stand); halt at +40 feet (Waiʻalae Stand); recession to -60 feet (Waipiʻo Stand); and rise to +25 feet (Waimānalo Stand). In the Late Pleistocene or Recent Time, the sea receded to its present level (Stearns, 1935).

Punchbowl, located approximately one half mile northeast of the Project Area, probably erupted during the Waipiʻo (-60 feet) Stand, depositing tuff in the area of the project site. The Waimānalo Stand (+25 feet) followed, creating coral ledges. Erosion occurred during the subsequent Waipio Stand (-60 feet) during which channels were cut in the coral ledges. The cinders of Tantalus and Sugar Loaf eruptions rest atop the emerged reef created during the Waimānalo Stand and in some places have sifted down into crevices and caves in the limestone. Because of its high permeability, it is "a valuable [water] intake formation. As it fell on a dissected and in places soil-covered Koʻolau surface, it gave rise to several springs. Punchbowl would have been covered by the firefountain deposits of the Tantalus and Sugar Loaf volcanics, but the material was later washed off the steep slopes, re-exposing the tuff at Punchbowl Crater."

Site Geology

The Project Area and adjacent properties are mapped on the *Geologic Map of the State of Hawaii* (Sherrod et al., 2007) and fall completely within a single map unit (designated Q*tf*), comprised of vent deposits from the Tantalus Vent of the Honolulu Volcanic Series. The site is downslope from the older Punchbowl vent whose rock type is listed as tuff.

Stearns and Vaksvik describe geologic unit Qtf as: "Very permeable, friable, bedded black firefountain deposits from Tantalus and Sugar Loaf craters, and forming parts of Tantalus and Sugar Loaf volcanics; in places cemented by secondary calcite, coarse near the vents, but elsewhere mostly small fragments of glassy ribbon bombs and pumice mantling preexisting surfaces." (Stearns et al., 1935).

The *Geological Map of the State of Hawaiʻi* also presents geologic symbols, which are a newer nomenclature than the map units. In the area of the Beretania Complex, the map unit and geologic symbol boundaries coincide. The Project Area falls within the symbol Qott, tuff from Tantalus Peak and Sugar Loaf vents described as: "Bedded black cindery ash and lapilli. Ejected during strombolian eruptions. Blankets large area southwest of vents, likely owing to position of vents on high ridge and subsequent deflection of eruptive plume by trade winds."

Stearns and Vaksvik's discussion of Punchbowl Volcanics indicated that the first blasts were steam explosions that created the brown tuff, followed by the rise of liquid lava in the crater, forming a lava lake. The lake subsided. "This subsidence was probably caused by a cone fissuring on the

southwest side, for a dike is exposed at the city reservoir on Alapaʻi near Crescent Street, from which lava has flowed southward under the present site on the Beretania pumping plant [the project site]. Logs of wells 88A to 88F at this station show a lava flow about 15 feet thick resting on about 50 feet of Punchbowl tuff and overlain by 5 to 15 feet of reef and 10 feet of black sand."

Stearns and Vaksvik note that the alignment of the Tantalus and Sugar Loaf craters suggests that both eruptions occurred concurrently along a nearly north-south fissure producing lava flows and firefountain deposits. The firefountain deposits are locally known as "black sand" even though they are mostly coarser than sand. The eruptions took place on high ridges exposed to strong trade winds; the firefountain deposits were drifted several miles southwestward and are more widespread than usual. In addition, coarse material rolled down the cliffs and accumulated at depth of 50 feet or more at their base; some of this material was transported by streams. In many places, the firefountain deposits "are even-bedded and partly cemented by calcium carbonate. In other places they show cross-bedding as a result of being reworked by water."

During preparation of the Geotechnical Data Report, Board of Water Supply personnel provided MFA with the drilling log of an on-site deep monitoring well (T-85) that was drilled in 1960. The log indicates 8 feet of black sand overlying 3 feet of "blue" rock, overlying 2 feet of clay, overlying one foot of hard rock, overlying 77 feet of soft "puka rock." Beneath the basalt, which ended at 91 feet below ground surface (bgs), the boring encountered various layers of coral and clay to 432 feet bgs. Hard rock was logged from 432 to 436 feet bgs, and possible clay for a short thickness below that. Material was not continually logged, at deeper depths, presumably due to lack of recovery, but, with the exception of "Cement"13 from about 445 to 461 feet bgs, most of what was logged appears to be basalt to about 955 feet bgs, below which was varying soft and hard material, with some voids, to the termination of the boring at 1,516 feet bgs (MFA, 2012).

3.2.1.2 TOPOGRAPHY

The Project Area is relatively steep and has been built up with paved parking stalls and retaining walls, generally sloping in the makai direction towards South Beretania Street. Elevations within ʻEwa Block, between Lauhala and Lisbon Streets, range from 56 feet mean sea level (MSL) at the back of sidewalk along Lusitana Street to 18 feet MSL along the makai project boundary. The elevation difference between the bottom of the BWS Employee parking lot and the top of the BWS fleet parking lot is approximately five feet.

The Diamond Head Block elevations range from 55 feet MSL at the back of sidewalk along Lusitana Street to 41 feet at the along the makai property boundary. Runoff generated onsite sheet flows across the paved parking lots to the adjacent roadway drainage systems (WOC, 2019).

The topography generally reflects the underlying geology, but with man-made terraces and retaining walls, particularly in the Project Area, which has been built up with paved parking.

3.2.1.3 SOILS

Soils in the Beretania Complex, shown in Figure 3-1, consists of Tantalus silty clay loams (TCC), 8 to 15 percent slopes and Makiki clay loam (MkA), 0 to 2 percent slopes. The Project Area, comprising the areas of the Beretania Complex with no existing buildings, is predominantly Tantalus silty clay loam. The Tantalus Series consists of well-drained soils on uplands of the islands of Oʻahu. These soils developed in volcanic ash and material weathered from cinders. They are moderately sloping to very steep, with elevations ranging from 100 to 2,000 feet (Foote et al. 1972).

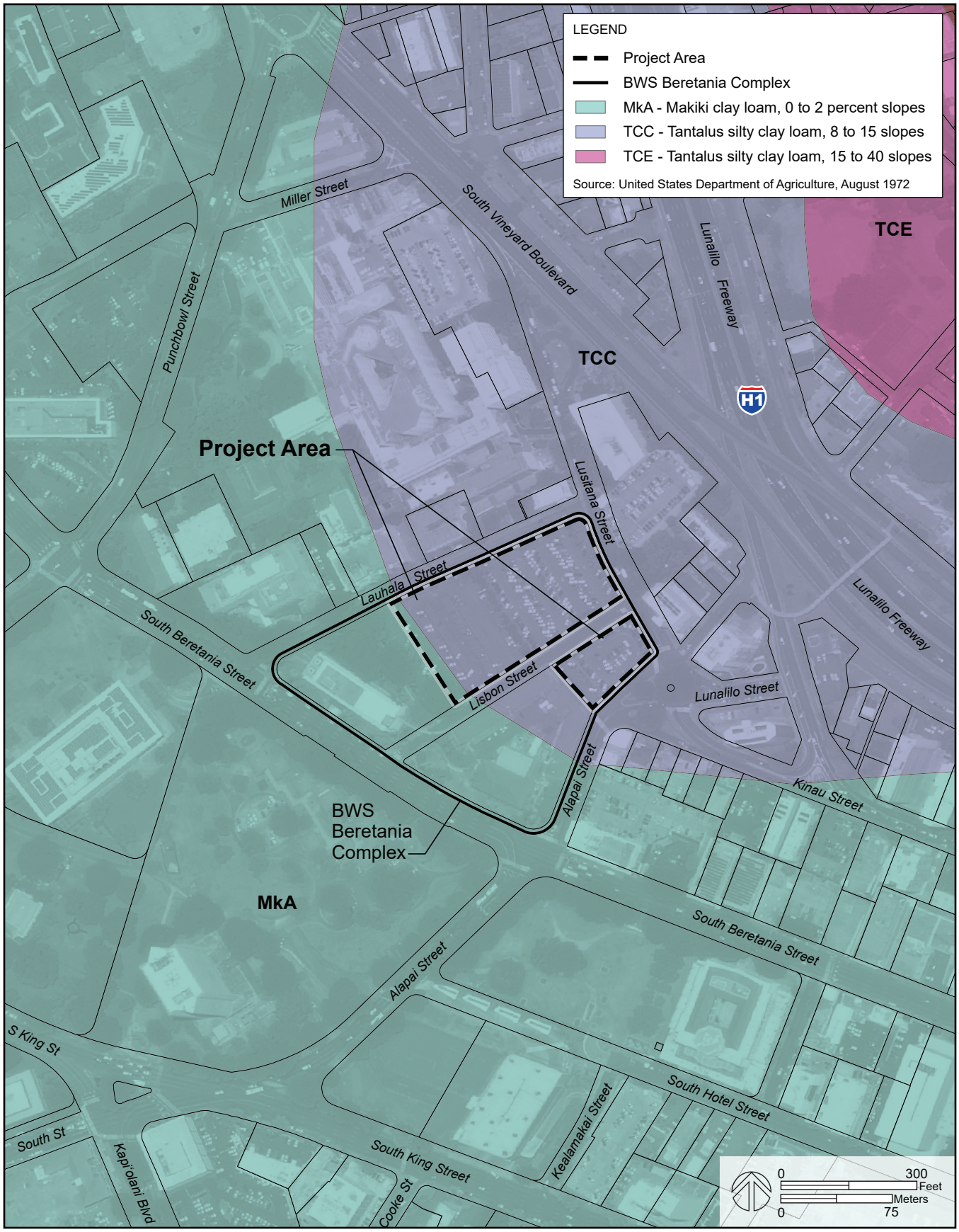
Geotechnical Data Report

The MFA 2012 geotechnical investigation effort drilled seven borings in the existing parking lots across the Project Area. In a representative profile of Tantalus silty clay loam, 8 to 15 percent slopes, the surface layer, about 18 inches thick, consists of very dark brown silt loam that has subangular blocky structure. The subsoil, about 11 inches thick, is dark reddish-brown, massive very fine sandy loam. The substratum is black, unweathered, gravel-sized cinders. Permeability is moderately rapid, runoff is slow, and the erosional hazard is slight (p.121). Included in mapping were small areas of stony soils in drainageways. The soil has moderate compressibility, and slopes as much as 70%; it is susceptible to sliding (MFA, 2012).

Soils in areas where the existing buildings are located (i.e., outside the Project Area) are mostly MkA. The Makiki Series is characterized by well-drained soils on alluvial fans and terraces in the City of Honolulu. These soils, which are nearly level, formed in alluvium mixed with volcanic ash and cinders. Makiki clay loam, 0 to 2 percent slopes is on smooth fans and terraces. In a representative profile done as part of the MFA Geotechnical Data Report, the surface layer is dark-brown clay loam about 20 inches thick, underlain by an approximately 10-inch layer of dark-brown clay loam that has subangular blocky structure and contains cinders and rock fragments. This subsoil is underlain by similar material, about 24 inches thick. Below this are volcanic cinders. Permeability is moderately rapid, runoff is slow, and the erosion hazard is slight. The soil has moderate shrink-swell potential and moderate shear strength.

The MFA study included a review of previous investigations conducted in the general vicinity. A 2004 geotechnical investigation (URS Corporation, 2004) for a parking structure on an adjacent property at the corner of Beretania and Lauhala Streets found subsurface soil consisting of a layer of volcanic cinder overlaying a coral reef formation that is known to have cavities. A 1976 unpublished Masters degree thesis from the University of Hawaiʻi was also cited. This study includes a paleogeologic map of Waikīkī, Moiliili, and Kakaʻako depicting a large, filled alluvial channel which *may* have cut through a portion of the current Project Area. That study area is dominated by three coral ledges, all dissected by various alluvial channels. MFA reported that the seven borings conducted during its 2012 study did not encounter the coral ledge. However, noting the coral encountered on the adjacent parking lot site, their report included the following:

> *"Therefore, if the channel theory is correct, it may only have cut through a portion of the [Beretania Complex] property, and can therefore be expected to have varying depths, because at least one of the channel sidewalls would have been on the subject property. Additionally, it was likely a shallow channel, because the pahoehoe, which likely predated the reef-building and subsequent erosion, is relatively shallow…" (MFA, 2012).*



Soils Map **Figure 3-1**

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3.2.2 POTENTIAL IMPACTS AND MITIGATION

3.2.2.1 TOPOGRAPHY AND SOILS

The 2012 MFA *Geotechnical Data Report* provides general site conditions to be used with the preparation of Request for Proposal (RFP) documents for the potential redevelopment of the Beretania Complex. More project specific investigation will be conducted by the selected contractor when definite plans for the site have been developed.

Based on the existing topography and depending on the proposed building layouts, some grade adjustment and/or retaining structures may be required. This will be determined during the project's design phase.

Site grading will conform to Chapter 14, Article 15 of the Revised Ordinances of Honolulu "Grading, Grubbing and Stockpiling" as amended. All grading and construction work will comply with the Rules Relating to Water Quality, Department of Planning and Permitting, City and County of Honolulu (amended September 17, 2018) to control soil erosion and ensure that the discharge of pollutants from the construction site are reduced to the maximum extent practicable (MEP).

During construction activities, temporary erosion control measures will be installed prior to demolition and/or construction activities. Recommended best management practices (BMP) include the use of silt fences, filter socks, stabilized construction ingress/egress, concrete wash-out areas, and sediment control filters at drain inlets and catch basins.

Once the new structures are completed and landscaping is installed, there will be negligible impact to topography or soils.

3.3 Water Resources and Hydrology

3.3.1 EXISTING CONDITIONS

3.3.1.1 SURFACE WATER

There are no surface water features on or in the vicinity of the Project Area. The site is currently a series of paved parking lots, and surface runoff sheet flows into existing catch basins along Lauhala Street ('Ewa Block) and Lisbon Street (Diamond Head Block). These catch basins connect to the City and County storm drainage system on South Beretania Street.

3.3.1.2 GROUNDWATER

The Beretania Complex is underlain by the Nu'uanu Aquifer System, a deeply confined groundwater aquifer which is part of the Honolulu Aquifer Sector on the island of O'ahu. The aquifer is classified by Mink and Lau, 1990, with the system identification number 30102116 (13321). This system includes an unconfined basal aquifer in sedimentary (nonvolcanic) lithology. The groundwater in this aquifer is described as currently used and containing groundwater with a moderate salinity of 1,000 to 5,000 milligrams/liter (mg/l) Chloride (Cl). The groundwater in the basal aquifer is neither a drinking water source nor ecologically important.

The site is further underlain by a second aquifer of the same system. The second aquifer is a confined, basal aquifer in flank compartments, and is classified with the system identification

number 30102121 (11113). This deep, confined aquifer is described as a currently used drinking water source. It contains groundwater with a fresh salinity of <250 mg/l Cl. It is also described as irreplaceable with a low vulnerability to contamination (Mink and Lau, 1990).

The 2012 MFA geotechnical study drilled seven borings throughout the Project Area. The study stated that "Because water was introduced into the boreholes as part of the coring process, it was not possible to tell if the groundwater table was encountered during the drilling" (MFA, 2012).

Other water resources at the Beretania Complex are the Beretania Pumping Station along South Beretania Street between Alapaʻi Street and Lisbon Street; a monitoring well in the existing Equipment parking lot and a caprock well in the basement of the Public Service Building. The caprock well provides water to the decorative water fountain feature fronting the Public Service Building. The Beretania Pumping Station contains seven (7) wells and is one of several major sources that provide drinking water to Metropolitan Honolulu between downtown and Waikiki.

3.3.2 POTENTIAL IMPACTS AND MITIGATION

The redevelopment of the Project Area will transform a completely paved area into a developed site with landscaping including grasses, shrubs and trees, increasing the quantity of pervious surfaces. Any increase in surface runoff due to the project improvements will be retained on site, and there will be no net increase in runoff to surrounding properties.

A National Pollutant Discharge Elimination System (NPDES) general permit will be required for construction activities. The development will comply with HAR Chapter 11-55, Water Pollution Control. Under provisions of the NPDES permit quantities, constituents, and velocities of drainage must not exceed pre-development levels. Best management practices will be implemented during construction to minimize runoff and control sediment, and may include the use of geotextiles and mats, silt fences, sediment traps or basins, proper dust control, and sound material stockpiling and management.

No significant impacts on groundwater resources are anticipated. Land use changes can affect the groundwater system by changing the magnitude and distribution of groundwater recharge. The increase in pervious surfaces over current conditions will likely result in a net increase in groundwater recharge. Due to the depth of the confined basal aquifer there is no possibility that short-term construction activities would impact this drinking water source. Construction of building foundations may encounter groundwater from the unconfined basal aquifer. Implementation of construction best management practices and compliance with the conditions of the NPDES permit will mitigate any adverse impacts.

Also, no significant impacts are anticipated on the Beretania Pump Station, the monitoring well and the caprock well. These water resources are either not in the areas included in the proposed redevelopment scenarios or will be provided uninterrupted access during construction and use of the redeveloped areas.

3.4 Biological Resources

3.4.1 EXISTING CONDITIONS

3.4.1.1 BOTANICAL RESOURCES

The entire Beretania Complex is a highly disturbed urban environment, with the Project Area entirely paved and used for ground level parking. Areas immediately surrounding the existing BWS buildings include landscaped vegetation of grass, low shrubs and scattered coconut palms (*cocos nucifera*). Behind the Public Service Building there is a rainbow shower tree (*Cassia x nealiae*) and several large canopied monkeypod trees (*Samanea saman*), which shade the parking area.

The Project Area is entirely paved with landscaping limited to the perimeter along the roadside. There a landscaped strip which parallels a retaining wall and chainlink fence cutting through the ʻEwa Block, separating the upper and lower parking areas. This landscaped strip extends from Lisbon Street to Lauhala Street and includes an evenly spaced row of paperbark (*Melaleuca quinquenervia*) trees. Other than this row of trees along the fence, there is no vegetation within the Project Area.

3.4.1.2 TERRESTRIAL AND AVIAN FAUNA

Fauna that would likely be found within the Beretania Complex include mammals that typically inhabit urban areas of Honolulu including feral cats (*Felis catus*), rats (*Rattus* sp), house mouse (*Mus musculus*) and Indian mongoose (*Herpestes a. auropunctatus*).

Avifauna found within the boundaries of the Beretania Complex would include alien species common to urban environments, such as the Common Mynah (*Acridotheres tristis*), Red crested Cardinal (*Paroaria coronata*), Northern Cardinal (*Cardinalis cardinalis*), House Finch (*Carpodacus mexicanus*), Java Sparrow (*Padda oryzivora*), Rock Pigeon (*Columba livia*), Spotted Dove (*Streptopelia chenensis*), Zebra Dove (*Geopelia striata*), Red-vented Bulbuls (*Pycnonotus cafer*), and Japanese White-eye (*Zosterops japonicus*). The Pacific Golden Plover (*Pluvialis fulva*) is a migratory shorebird that may use the grassy lawn areas fronting the Public Service Building and Pump Station building, particularly during the late summer and winter months. Other species of migratory shorebirds may occasionally pass over but would not settle at the Project Area.

3.4.1.3 PROTECTED SPECIES

There are no threatened or endangered species or their habitats within the Beretania Complex or Project Area. In a December 4, 2018 comment letter sent in response to the Environmental Impact Statement Preparation Notice (EISPN), U.S. Fish and Wildlife Service provided a list of protected species most likely to be encountered by projects in the Hawaiian Islands and in the project vicinity. The list noted that the federally endangered Hawaiian hoary bat or *ʻōpeʻapeʻa* (*Lasiurus cinereus semotus*) may occur in the area, as all of the main Hawaiian Islands are considered to be within the species' range. The bats nest in woody vegetation, primarily in areas near rural lowland forests. The USFWS and State of Hawaiʻi Department of Land and Natural Resources (DLNR) recommend that trees over 15 feet in height not be trimmed during the bat pupping season, which occurs from early June to mid-September.

The White Fairy Tern or *manu-o-kū* (*Gygis alba*), is an indigenous seabird that is federally protected under the Migratory Bird Treaty Act. The tern is known to breed in urban Honolulu, including in the

monkeypod trees behind the BWS Public Service Building. As of May 30, 2019, several active *manu-o-kū* nests were documented in the monkeypod trees (Hui Manu-o-Ku, 2019). Fairy terns do not build nests, but lay their eggs in tree knots, crooked branches, or other features that secure the eggs. The white fairy tern is the official bird of Honolulu and the State of Hawaiʻi has designated it as "threatened."

3.4.2 POTENTIAL IMPACTS AND MITIGATION

Significant impacts to flora and fauna occur when an action has a "substantial effect on a rare, threatened or endangered species, or its habitat" (HAR Chapter 11-200-12). Due to its current developed state as a parking lot and lack of biological resources, redevelopment would have no significant impact on flora and fauna.

All the existing vegetation surrounding the BWS buildings are outside the Project Area and will not be impacted by construction. The row of paperbark trees along the retaining wall and fence will be removed as part of the redevelopment. This non-native tree is commonly found in Honolulu and any bird species that currently rest or nest in these trees can easily find replacement habitat. The white fairy tern is known to nest in the monkeypod trees outside the Project Area. These trees will not be impacted by the redevelopment.

Other seabird species do not nest or reside in the project vicinity, but seabirds flying over the area can be adversely impacted by lighting associated with night time construction. Project construction will occur during the day, approximately from 7:00 am to 6:00 pm Monday through Friday, and 9:00 am to 6:00 pm Saturdays, and no impact on overflying seabirds is anticipated.

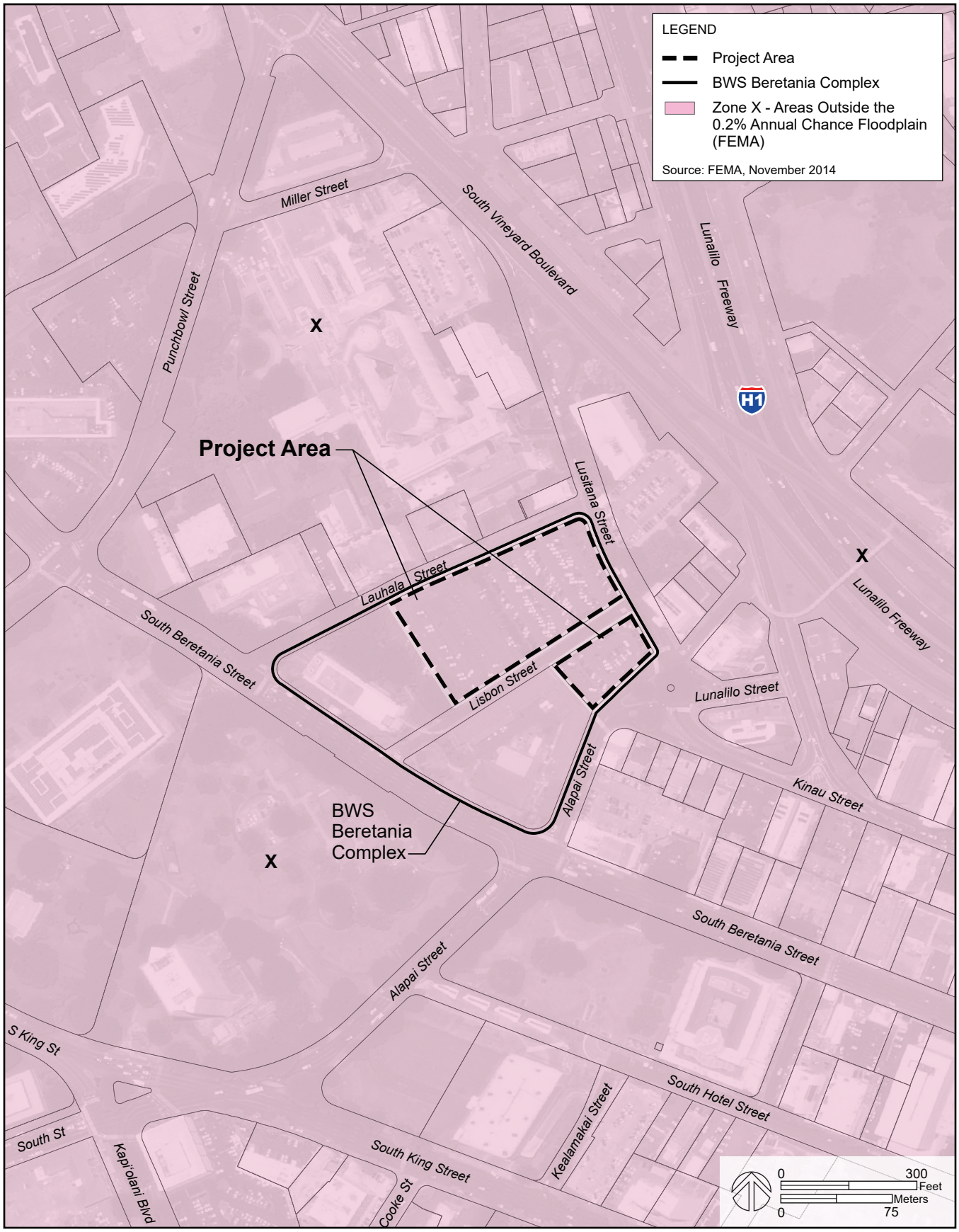
3.5 Natural Hazards

3.5.1 EXISTING CONDITIONS

The Hawaiian Islands are susceptible to a number of natural hazards, including flooding, volcanic activity, seismic events, hurricanes, and tsunami inundation. The effect of these hazards on a given area varies depending on the location, topography, elevation, vegetation and land use. Global climate change may also exacerbate the occurrence and/or effects of natural hazard events. The Project Area's susceptibility to various natural hazards is discussed below.

3.5.1.1 FLOOD

The Federal Emergency Management Agency (FEMA) flood hazard area classifications are utilized to gauge flood hazard risk. The Beretania Complex site is not in a flood prone area. Both the site and surrounding areas are in FEMA's Flood Zone X, areas of minimal flood hazard, determined to be outside the 0.2% annual chance (500-year) flood (see Figure 3-2). No base flood elevations or depths are established for this zone. The Project Area is not in proximity to the coast and there are no streams or surface water bodies in the immediate vicinity.



Flood Zones Map **Figure 3-2**

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3.5.1.2 SEISMIC ACTIVITY

Seismic activity or earthquakes in the Hawaiian Islands are primarily associated with volcanic eruptions from the expansion or shrinkage of magma reservoirs, rather than shifts in the Earth's crust. The island of Oʻahu is periodically subject to episodes of seismic activity of varying intensity, but available historical data indicates that the number of major earthquakes have generally been fewer and of lower intensity compared with other islands, such as Hawaiʻi Island (Big Island).

Earthquakes cannot be avoided or predicted with any degree of certainty, and an earthquake with a magnitude greater than 5.0 on the Richter scale could cause damage to roadways and structures. The State of Hawaiʻi 2018 Hazard Mitigation Plan (HMP) (HI-EMA, 2018) assessed earthquake risk to buildings and infrastructure. One of the risk factors evaluated is an area's National Earthquake Hazard Reduction Program (NEHRP) soil classifications. The NEHRP soil classifications defined five soil types, A to E, based on their shear-wave velocity. To date, the NEHRP soil classifications have only been determined and delineated for Maui and Hawaiʻi Counties. This information is not available for the City and County of Honolulu.

The 2018 HMP does provide a probabilistic seismic hazard map for the 100-year earthquake which includes the Island of Oʻahu. The hazard for the Island of Oʻahu was considered "Moderate." The study also noted that a severe earthquake affecting the City and County of Honolulu could result in a severe economic impact, since the receipt of goods, services and finances rely on major roads, ports and harbors or institutions on Oʻahu.

Impacts of Climate Change

The impact of climate change on the frequency of earthquakes is unknown. However, the Hazard Mitigation Plan notes that secondary impacts could be magnified by climate change. For example, earthquakes can cause large and disastrous landslides, and rising air temperatures can facilitate soil breakdown, affecting rates of erosion and the likelihood of landslide. Climate change may also increase the frequency of intense rainstorms, resulting in greater erosion and higher probability of landslides.

3.5.1.3 HURRICANES

Hurricanes are one subclass of a category of phenomena known to meteorologists as tropical cyclones. Hurricanes are characterized by the following life-threatening effects: high winds in excess of 74 mph; high storm surges; and heavy rains that will exceed flash flood conditions. The hurricane season in Hawaiʻi officially begins on June 1 each year and ends six months later on December 1.

Virtually all hurricanes near the Hawaiian Islands since 1950 have approached from the southeast, south, or southwest. Not all storms pass directly through the State, and actual hurricane strikes on the Hawaiian Islands are relatively rare in the modern record. More commonly, hurricanes pass close to the islands generating large swells and moderately high winds causing varying degrees of damage (USGS, 2002). For example, Hurricane Darby impacted Hawaiʻi in the summer of 2016, bringing heavy rain and widespread flash flooding to windward areas across the State. Hurricanes Dot (1959), Iwa (1982), and Iniki (1992) directly hit Kauaʻi. Hurricane Iniki was a Category 4 hurricane with winds up to 150 mph, and caused nearly $2 billion in damage and six deaths, which is more than any other hurricane to affect the State since records began.

Figure 3-3 shows the paths of past hurricanes and tropical storms that have affected the Hawaiian Islands from 1950–2016 based upon hurricane tracking information from the National Oceanic Atmospheric Administration's (NOAA) website accessed in February 2018.

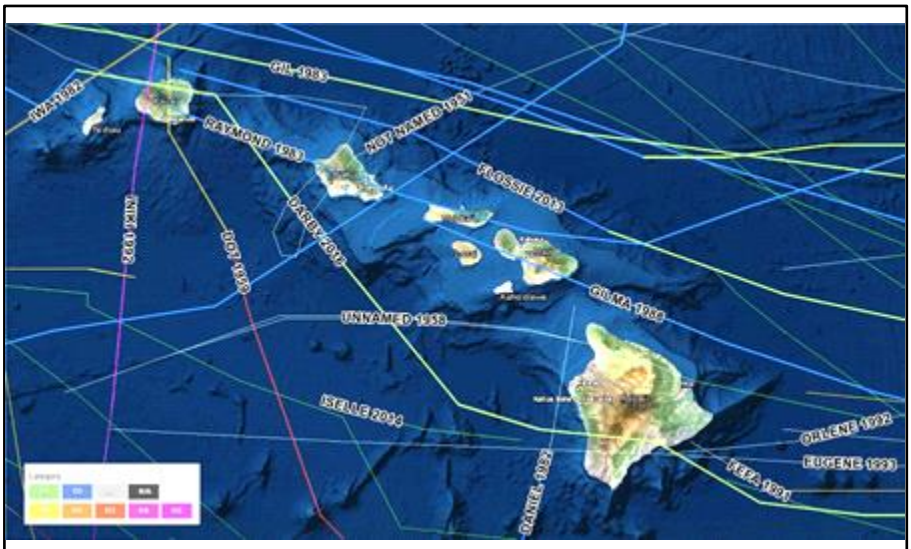

FIGURE 3-3: MAJOR STORM TRACKS (NOAA, FEBRUARY 2018)

Impacts of Climate Change

Hurricanes and tropical storms are projected to grow in average size and strength due to climate change and sea level rise. Waves generated by these systems are anticipated to cause coastal erosion and flooding, which will worsen with sea level rise. More frequent El Nino events will increase tropical cyclone activity. In addition, changes detected in the prevailing northeast trade winds may shift large scale pressure and wind patterns, affecting the track of future tropical cyclones (HI-EMA, 2018).

3.5.1.4 TSUNAMI

Tsunami are caused by a sudden movement of the seafloor that generates a series of waves which travel across the ocean until they reach a coastline. Seafloor movements may include faulting, landslides, or submarine volcanic eruptions. Landslides originating either under the sea or above sea level and then sliding into the water may also generate a tsunami. Tsunami manifest themselves as either large-breaking waves, often largest around headlands where they are concentrated by wave refraction, or as rapidly rising sea level like a flooding tide. The high degree of volcanism and seismic instability in and around the Pacific Ocean has contributed to a history of tsunami occurrences. Because it is one of the most geologically active regions on Earth, the Hawaiian coast is under the continuous threat of tsunami inundation (USGS, 2002).

The City and County of Honolulu's tsunami evacuation maps for O'ahu were developed in 1991 and updated in 2010, and show minimum safe evacuation distance from shoreline areas in the event of a tsunami. The evacuation zone is comprised of the inundation zone, i.e., the area where the tsunami is expected to go beyond the immediate shoreline, plus an additional buffer for safety.

Following the 2011 tsunami in Tohoku, Japan, there was a newly recognized risk of tsunami from a very large Aleutian event. As a result, the City unveiled a new set of "Extreme Tsunami Evacuation Zone (XTEZ)" maps in 2015. The XTEZ represents a secondary evacuation zone, should an extremely large (9M+) earthquake occur in the Aleutian Islands, generating an especially destructive tsunami in Hawaiʻi.

The City's tsunami evacuation zone map which covers the area from the Airport to Waikīkī (Map 19) shows the Beretania Complex is located in the "safe zone," outside of both the tsunami evacuation zone and the XTEZ.

Climate Change Impacts

The warming of the atmosphere and the oceans, and the melting of ice sheets and glaciers is causing the global mean sea level to rise. Higher sea levels will exacerbate coastal inundation from a tsunami.

3.5.2 POTENTIAL IMPACTS AND MITIGATION

The Project Area is not within an area vulnerable to flooding or other natural disasters. It is outside the tsunami evacuation zone, including in the case of an extreme tsunami. However, the redevelopment will be required to comply with all City and County of Honolulu and State of Hawaiʻi guidelines and standards regarding building safety.

Hurricanes are difficult to predict and could impact anywhere on Oʻahu at any time. The redevelopment will result in the construction of new ten-story structures within the Beretania Complex site. All structures are vulnerable to damage from strong winds and heavy rainfall associated with a hurricane. The entire State of Hawaiʻi has been designated a hurricane-prone region and a "wind borne debris region" under the International Building Code (IBC), and the effective ultimate design wind speed is 130 miles per hour or greater. No structures are proposed in areas that are vulnerable to storm surge.

All new structures at the Beretania Complex will be built to conform with applicable building design standards and building codes. The new structures will not have greater exposure or risk than any other structure in urban Honolulu. There will not be a greater risk to existing uses or structures due to the redevelopment.

In addition to the locational and physical attributes of the Project Area, demographic and social characteristics impact vulnerability to natural hazards. Research has shown that in general, certain segments of the population are most vulnerable to the types of natural hazards discussed in this section. Populations such as the elderly (persons over 65 years of age) and individuals living below the U.S. census poverty threshold are most vulnerable due to their limited physical and financial ability to react or respond during a hazard; the location and quality of their housing; and their ability to be self-sustaining for long periods of time because of limited ability to stockpile supplies (HI-EMA, 2018).

The Hazard Mitigation Plan states that as the State's population ages, additional resources may be needed to support evacuation efforts, both in advance of and following a natural disaster. The proposed uses for the Project Area include affordable senior rental housing and assisted living facility, both of which would result in concentrated populations of elderly and frail elderly residents. These individuals could be particularly vulnerable to natural hazards, and redevelopment at the Project Area will need to consider the special needs of this population. For

example, emergency power may be required for medically necessary equipment during and after an event. Facility design should consider the limited mobility of individuals and the option to shelter in place in an emergency. Emergency plans developed by apartment or facility managers should also address maintaining communication with local emergency management officials, evacuation procedures, security/lockdown, and ensuring adequate supplies of water, food and medications.

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4.0 HUMAN ENVIRONMENT

4.1 Surrounding Land Uses

4.1.1 EXISTING CONDITIONS

4.1.1.1 SURROUNDING LAND USES

The BWS Beretania Complex property is located on South Beretania Street, a major thoroughfare running one-way westbound through downtown Honolulu. The surrounding area is intensely developed, primarily with government buildings and medical offices associated with the nearby Queen's Medical Center, as well as some commercial uses on Alapaʻi and South Beretania Streets. Directly across the Project Area on South Beretania Street (on the makai side of the street) is the Honolulu Civic Center, a large block that includes the State Kalanimoku office building, Frank F. Fasi Municipal Building, municipal parking structure, and Honolulu Hale (City Hall). Immediately west (ʻEwa) of the Civic Center is the Hawaiʻi State Capitol, Hawaiʻi State Library, and ʻIolani Palace. This area, part of the City's Capital Special District, is characterized by its park-like setting and open spaces surrounding City and State government buildings.

The Beretania Complex property is bordered by South Beretania Street, Lauhala Street, Lusitana Street and Alapaʻi Street. The Queen's Physician's Office Building (POB) III is located at the corner of Lauhala Street and South Beretania Street, across from the BWS Public Service Building. Further up Lauhala Street is a smaller office building and two low rise, walk-up apartment buildings. Directly across the existing parking lots on the mauka side of Lusitana Street are the Queen's POB II office building and the 8-story Alapai Apartments. Further east on the Lusitana Street corridor, there are other high-rise apartment buildings, including the 13-story Lunalilo Tower and the 12-story Royal Kinau Apartments. Other land uses nearby include the Slumberworld Furniture Store at the corner of South Beretania and Alapaʻi, and the Honolulu Police Department's headquarters building, located further east on South Beretania. Surrounding land uses are shown in Figure 4-1.

4.1.2 POTENTIAL IMPACTS AND MITIGATION

Redevelopment of a portion of the Beretania Complex will convert existing open parking lots to more intensive use, including several ten-story structures. The existing BWS facilities on the site, the Public Service Building, the Engineering Building, and the Pump Station, will continue current operations. There will be no modifications made to these buildings. The redevelopment will result in the loss of existing surface parking spaces used for BWS employees and fleet vehicles. Parking will be replaced in a proposed parking structure. The redevelopment will include a new office building for BWS, enhancing BWS operations.

The proposed redevelopment of the Project Area will be compatible with the provisions of the Hawaiʻi Capital Special District and will not have an adverse effect on the District or on the surrounding land uses within the District. This is discussed further in Section 4.5.2.5, Special Districts, and in Chapter 5.

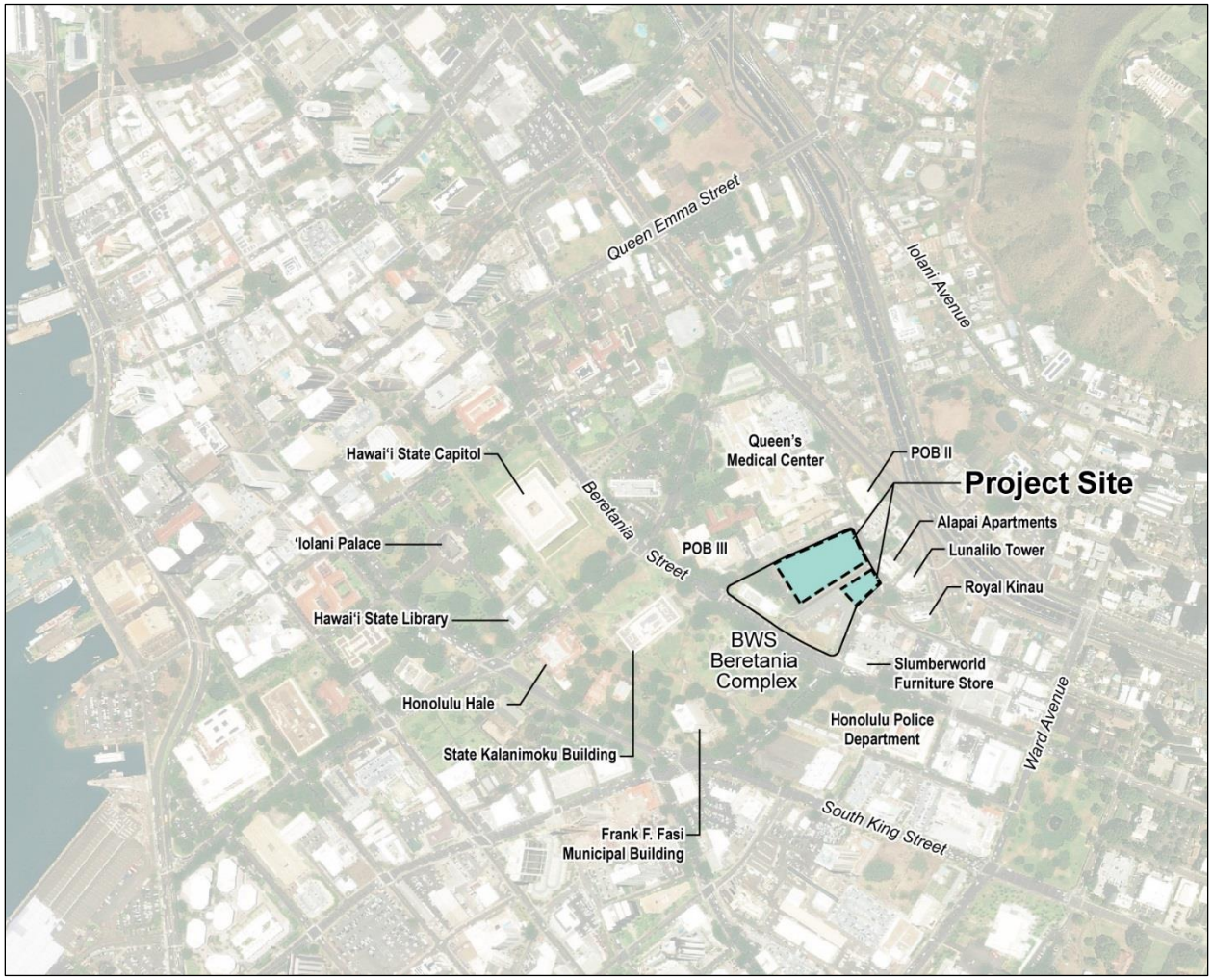


FIGURE 4-1: SURROUNDING LAND USES

4.2 Air Quality

4.2.1 EXISTING CONDITIONS

Air quality at a given location can be influenced by a number of factors, including geography, climate, the quantity and type of pollutants emitted locally and regionally, and the dispersion rates of these pollutants. The dispersion of pollutants is influenced by wind speed and direction, atmospheric stability, temperature, the presence or absence of inversions, and topography. Air quality is affected by both stationary sources (e.g., industrial development) and mobile sources (e.g., motor vehicles). At the Beretania Complex, motor vehicle emissions are likely the largest source of air borne pollutants. In general, ambient air quality at the site is good.

The Project Area is located behind the BWS Public Service Building which fronts South Beretania Street. Portions of the Project Area that may be most impacted by traffic-related pollutants may be mauka areas, closest to Lusitana Street and downwind from the H-1 Freeway. There is little traffic congestion along Lauhala Street, Lisbon Street and Alapa'i Street.

The federal Clean Air Act (CAA), which was last amended in 1990, requires the U.S. Environmental Protection Agency (USEPA) to set National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment. NAAQS have been established for six principal pollutants, called "criteria" pollutants: carbon monoxide (CO), nitrogen oxides (NOx), ozone (O_3), particulate matter smaller than 10 microns (PM_{10}), particulate matter smaller than 2.5 microns ($PM_{2.5}$), sulfur oxides, and lead (Pb). The State of Hawai'i has also established its own standards for these pollutants and for hydrogen sulfide. The State AAQS are more stringent than the National AAQS for certain pollutants. Table 4-1 below shows the national and State standards for these pollutants.

TABLE 4-1: NATIONAL AND STATE AMBIENT AIR QUALITY STANDARDS

	Standard		
Pollutant	**Hawai'i State**	**Federal Primary (Health)**	**Federal Secondary (Welfare)**
Carbon Monoxide (CO)			
1-hour average	9 ppm	35 ppm	None
8-hour average	4.4 ppm	9 ppm	None
Lead (Pb)			
3-month average	1.5 μg/m³ (calendar quarter)	0.15 μg/m³ (running 3-month)	Same as primary
Nitrogen Dioxide (NO_2)			
1-hour average	None	100 ppb	None
Annual average	0.04 ppm	53 ppb	Same as primary
Particulate Matter < 10 microns (PM_{10})			
24-hour block average	150 μg/m³	150 μg/m³	Same as primary
Annual average	50 μg/m³	None	None
Particulate Matter < 2.5 microns ($PM_{2.5}$)			
24-hour block average	None	35 μg/m³	Same as primary
Annual average	None	12 μg/m³	15 μg/m³
Ozone (O_3)			
8-hour rolling average	0.08 ppm	0.070 ppm	Same as primary
Sulfur Dioxide (SO_2)			
1-hour average	None	75 ppb	None
3-hour block average	0.5 ppm	--	0.5 ppm
24-hour block average	0.14 ppm	None	--
Annual average	0.03 ppm	None	--
Hydrogen Sulfide			
1-hour average	25 ppb	None	None

Source: State of Hawai'i, Department of Health, Clean Air Branch, 11/19/2015, URL= https://air.doh.hawaii.gov/home/text/120. Accessed 7/2019.

The "primary" standards have been established to protect the public health, including the health of sensitive populations such as asthmatics, children, and the elderly. The "secondary" standards are intended to protect the nation's welfare, which includes protection against decreased visibility, and damage to animals, crops, vegetation, and buildings. The State of Hawaiʻi issues its ambient air quality standards in terms of a single standard that is designated "to protect public health and welfare and to prevent the significant deterioration of air quality."

Units of measure for the standards are parts per million (ppm) by volume, milligrams per cubic meter of air (mg/m^3), and micrograms per cubic meter of air ($\mu g/m^3$).

Attainment Status of Study Area

Section 107 of the 1977 Clean Air Act Amendments requires the USEPA to publish a list of geographic areas that are not in compliance with the National AAQS, and these areas are called non-attainment areas. As noted above, the State of Hawaiʻi is an attainment area for CO, O_3, PM_{10} and $PM_{2.5}$.

Monitored Air Quality

Air quality within the Project Area is good, and there are no major sources of air pollution in the area. Air pollutant levels are monitored by the State Department of Health (DOH) at a network of sampling stations statewide. The DOH's Honolulu air monitoring site is located on Punchbowl Street across the Queen's Medical Center, less than a quarter mile from the BWS Beretania Complex. Based on ambient air monitoring data, the U.S. Environmental Protection Agency has classified the island of Oʻahu and the entire State of Hawaiʻi as being in attainment of federal standards.

4.2.2 POTENTIAL IMPACTS AND MITIGATION

The redevelopment of the Project Area will involve demolition, excavation and other ground disturbance that will generate short term impact to air quality. Fugitive dust will be generated from construction activities, and construction equipment and machinery will generate exhaust fumes. These impacts will be localized and temporary and can be mitigated by construction best management practices.

In the long term, air quality could be impacted by increased vehicle emissions due to more vehicles in the Project Area. The development of a new BWS office building, assisted care living, and a parking structure will generate additional traffic, as discussed in Section 4.10, Roadways and Transportation. Long-term air quality impacts are not expected to be significant.

4.3 Noise

A *Noise Measurement and Evaluation Report* was done for the project by CENSEO AV+Acoustics, and is included as Appendix A. The purpose of the study was to measure the existing noise in the project area, identify potential noise impacts to and from the surrounding area as a result of implementing the project, evaluate sound levels with respect to State or local noise regulations, and provide conceptual approaches to noise mitigation.

4.3.1 EXISTING CONDITIONS

4.3.1.1 PROJECT LOCATION AND DESCRIPTION

Figure 4-2 shows noise sensitive land uses, primarily multi-family residential, surrounding the Project Area. The distances between these properties and the Project Area property line are provided in the accompanying table. The noise study evaluated construction period and long-term impacts to these sensitive receptors.

Receiver ID	Approximate Address	Receiver Type	Distance from Project Property Line to Existing Receiver
R1	1295 Lauhala Street	Multi-Family Residential	75 ft.
R2	1400 Lauhala Street	Multi-Family Residential	50 ft.
R3	1308 Alapai Street	Multi-Family Residential	75 ft.
R4	710 Lunalilo Street	Multi-Family Residential	125 ft.
R5	728 Kinau Street	Multi-Family Residential	200 ft.
R6	713 Kinau Street	Multi-Family Residential	120 ft.

Source: CENSEO AV + Acoustics, 2019

FIGURE 4-2: NOISE SENSITIVE RECEIVERS IN THE SURROUNDING AREA

4.3.1.2 SOUND REGULATIONS AND GUIDELINES

The CENSEO study evaluated project impacts using the following sound regulations and guidelines.

State of Hawai'i Administrative Rules, Department of Health (DOH)

The State of Hawai'i's Community Noise Control Rule (HAR §11-46) identifies three classes of zoning districts (Class A, B and C) based on their land use, and specifies maximum permissible sound levels due to stationary noise sources. The Community Noise Control Rule also regulates noise related to construction activities. The Project Area is considered a Class B zoning district, characterized by multi-family dwellings, apartment, business, and commercial use. Maximum noise levels for Class B districts are 60 dBA (exterior) for day hours (7 AM to 10 PM), and 50 dBA (exterior) for night hours (10 PM to 7 AM).

State Department of Transportation, Traffic Noise Impacts

For highway projects, the State Department of Transportation (HDOT) states that a traffic noise impact occurs when the predicted traffic noise levels at a receptor or common use area "approach" or exceed the Noise Abatement Criteria (NAC) for Considering Barriers, for defined land use categories, or when predicted traffic noise levels "substantially exceed the existing noise levels by 15 dB or more. "Approach" is defined as 1 dB less than the NAC for the applicable land use category.

A traffic noise impact requires that noise barriers be constructed if a study finds their construction to be "feasible and reasonable." Feasible and reasonable criteria include: noise receptor be exposed to sound levels which equal or exceed the NAC for the applicable land use category; noise barrier provide a minimum of five (5) dB of noise level reduction; and total cost of noise barrier not exceed $60,000 per benefitted residence.

Although this project is not a highway project and the HDOT criteria are not applicable, the criteria can be used as a guideline for assessing noise impacts due to vehicles.

State Department of Health, Noise Reference Manual, O'ahu Edition-Construction Noise

The State Department of Health (DOH) allows construction to occur with the appropriate community noise permits during specific hours. Normal construction equipment is allowed to operate from 7:00 AM to 6:00 PM, Monday through Friday and from 9:00 AM to 6:00 PM on Saturdays. Noisier equipment such as pile drivers, jack hammers and demolition equipment are allowed to operate from 9:00 AM to 5:30 PM Monday through Friday only.

DOH, Construction Noise Permits

A Community Noise permit will need to be submitted and approved by the DOH before construction can begin. Loud construction activities outside of normal construction hours require an approved Community Noise Variance.

Federal Transit Administration, Construction Noise

DOH does not quantify allowable construction sound levels. For their acoustical analysis, CENSEO utilized the Federal Transit Administration (FTA) noise limits as "reasonable criteria for assessment" to evaluate property line noise levels. For this project, a 1-hour Leq of 90 dBA is recommended as the maximum daytime construction noise level at the project boundary to the

adjacent residential land use properties. Nighttime construction activities are not recommended (CENSEO, 2019).

4.3.1.3 EXISTING AMBIENT SOUND ENVIRONMENT

Ambient noise level measurements were conducted by CENSEO AV+Acoustics to assess the existing environment and to assess potential noise impacts from traffic increases due to the project and project-based construction noise. Long-term and short-term measurements were conducted. Measurement equipment and procedures are described in the *Noise Measurement and Evaluation Report* in Appendix A.

One (1) long-term and five (5) short term noise measurement locations were selected. The long-term measurement site was located in the northeast parking lot near Lisbon Street. The short-term measurement sites were located adjacent to the Project Area on the immediately surrounding streets (Lisbon Street, Lauhala Street, Kinau Street, Lusitana Street). Sound sources at these locations are anticipated to be project-related construction and traffic. The location of the measurement sites is shown in Appendix A.

The metrics used to evaluate the sound level at each measurement location are the equivalent sound level (L_{eq}), 1% exceedance level (L_1), 10% exceedance level (L_{10}), and the 90% exceedance level (L_{90}). The L_{eq} is the average sound level over a specified time period, usually one-hour. A one-hour L_{eq} can also be labeled as L_{eq}(h). The L_{90} is the sound level that is less than 90% of the measured sound levels over an hour and is widely accepted as the standard for determining the background noise level. Likewise, the L_{10} is the sound level exceeded 10% of the time and L_1 is the sound level exceeded 1% of the time. The L_{10} is a good estimate for the sound level of infrequent events, and the L_{01} is an estimate for the sound level of loudest events.

Long-Term Measurement Results

Noise measurements at each of the six measurement locations is included in the CENSEO study. The following Figure 4-2 summarizes the average 24-hour, L_{eq}, L_1, L_{10}, L_{90}, and peak one-hour L_{eq} for the long-term measurement location L1.

TABLE 4-2: LONG-TERM NOISE MEASUREMENT RESULTS

Measurement ID	Distance from Hwy	Average 24-Hour L_{eq}	Average 24-Hour L_{10}	Average 24-Hour L_{50}	Average 24-Hour L_{90}	Peak 1-Hour Leq
L1	75 ft.	56 dBA	58 dBa	54 dBA	50 dBA	61 dBa

Source: CENSEO AV + Acoustics, 2019

Short-Term Measurement Results

Traffic noise from adjacent roadways was the primary noise source at each short-term measurement location. While the total measurement duration was less than an hour, the measurement results are representative of the sound levels for the entire hour and summarized in Table 4-3.

TABLE 4-3: SHORT-TERM NOISE MEASUREMENT RESULTS

Measurement ID	Nearest Street	Distance from Street	1-Hour L_{eq}	1 Hour L_1	1-Hour L_{10}	1-Hour L_{90}
S1	Beretania St.	10 ft.	74 dBA	79 dBA	77 dBA	65 dBA
S2	Lauhala St.	10 ft.	66 dBA	75 dBA	69 dBA	58 dBA
S3	Lusitana St.	10 ft.	64 dBA	70 dBA	66 dBA	58 dBA
S4	Lusitana St.	10 ft.	65 dBA	73 dBA	67 dBA	59 dBA
S5	Kinau St.	10 ft.	61 dBA	69 dBA	63 dBA	57 dBA

Source: CENSEO AV + Acoustics, 2019

4.3.2 POTENTIAL IMPACTS AND MITIGATION

4.3.2.1 PROJECT RELATED TRAFFIC NOISE

A computer-generated Traffic Noise Model (TNM) was used to analyze additional traffic noise due to more vehicles on the surrounding roadways as a result of the project. The data was evaluated with respect to the HDOT Noise Abatement Criteria. Measured sound levels and corresponding traffic counts taken by CENSEO were used to verify and calibrate the noise model. Information from the May 2019 Draft Traffic Impact Report by Wilson Okamoto Corporation was also utilized.

The locations for the noise analysis were chosen to represent the residential properties adjacent to the Project Area. These locations had varying traffic conditions, topography and distance from the noise sources and obstructions. Noise was evaluated at Receivers R1, R2, R3 and R4, shown previously on Figure 4-2. Noise evaluation was done for AM and PM peak hours of traffic under 1) existing conditions, 2) Year 2026 vehicle volumes with no project, and 3) Year 2026 vehicle volumes with project. Calculated noise results are included in the Noise Measurement and Evaluation Report. The results show that at all receiver locations and for all project alternatives, anticipated noise levels in Year 2026 are within 1 dB of both baseline (existing conditions) and Year 2026 with no project levels.

The HDOT Noise Abatement Criteria for residential land uses is 67 dBA. The Year 2026 traffic noise does not approach or exceed the NAC residential threshold at any receiver location. In summary, the surrounding residential buildings would not be considered impacted by traffic noise due to the project. No traffic noise mitigation measures are recommended.

4.3.2.2 CONSTRUCTION-RELATED NOISE

The CENSEO study evaluated airborne noise levels from redevelopment to the noise sensitive areas in the surrounding community. Special attention was paid to the surrounding residential buildings, which are considered noise sensitive when compared to typical industrial and commercial spaces. Construction noise levels at the residences can vary significantly, depending on the types and quantity of equipment used, equipment distance from the residence, and ground type.

Noise Assessment Procedure and Assumptions

Typical noise-generating construction equipment includes trucks, air compressors, backhoes, compactors, concrete mixers, bulldozers, graders, jack hammers, pavers and pile drivers. The FTA

Noise and Vibration Impact Assessment Manual, 2018 estimates the typical noise levels from each of these at a distance of 50 feet from the source. CENSEO estimated worst-case construction noise levels to determine if noise will exceed the FTA's recommended 90 dBA threshold at the nearest residences.

It is assumed that construction at the Project Area will be split into three general phases:

- **Earthwork Phase**: Consists of excavation and general earthwork. Backhoes, bulldozers, vibratory compactors, graders, truck/haulers, and jackhammers are assumed to be the major noise sources used during the earthwork phase.
- **Building Phase**: Backhoes, trucks, pile drivers, jackhammers, air compressors, and generators are assumed to be the major noise sources during the building phase.
- **Paving Phase**: Backhoes, compactors, trucks, and pavers are assumed to be the major noise sources used to install roads and utilities during the paving phase.

Not all types of equipment will be used during all construction phases. The size of the construction site limits the maximum amount of equipment used at a given point in time. The CENSEO study estimated the quantity of construction equipment during each phase of construction and used this information to predict construction noise levels for each phase.

It is assumed that construction vehicles will be distributed throughout the Project Area and not concentrated near a single residential adjacent property line at any one time. Though many vehicles are expected to be working in the Project Area at once, noise at the residences will be dominated by the few vehicles working near the project boundary. These critical vehicles are assumed to be at the construction boundary unless, like the pile driver, the equipment is generally restricted to a certain part of the Project Area. Portable tools, like the jackhammer, are conservatively assumed to be at the construction boundary while stationary equipment, like the generator, are assumed to be towards the interior of the project site. Because the project area consists mostly of pavement, considered hard ground, a ground factor (G) of 0 was used to calculate ground attenuation.

Construction Noise Assessment Results

Predicted noise levels at nearby sensitive receivers from the various construction phases are shown in Tables 4-4 through 4-6 below. Each table provides information for one of the three development scenarios: Scenario 1 (Assisted Care Living Facility and Office Building); Scenario 2 (Affordable Senior Rental Apartments and Office Building); and Scenario 3 (Parking Structure and Office Building). The overall sound levels are shown in A-weighted decibels.

Noise levels exceeding 90 dBA are shown in **bold**. The pile driver is the loudest construction equipment noise source and is the main noise concern. Construction noise during the earthwork phase and building phase is expected to exceed 90 dBA when the group of vehicles closest to the project boundary are within 60 feet of a residence. Pile driver noise is expected to exceed 90 dBA when the pile driver is within 180 feet of a residence. Construction noise during the paving phase is not expected to exceed 90 dBA during this project.

TABLE 4-4: PREDICTED CONSTRUCTION NOISE LEVELS AT NEARBY RESIDENCES, SCENARIO 1 (ASSISTED CARE LIVING FACILITY AND OFFICE BUILDING)

Noise—Sensitive Receiver	Distance from Residence to Project Area	Distance from Residence to Project Building	Earthwork Phase Noise Level	Building Phase Noise Level	Paving Phase Noise Level
R1	65 ft.	100 ft.	89 dBA	**96 dBA**	85 dBA
R2	55 ft.	65 ft.	**91 dBA**	**99 dBA**	87 dBA
R3	70 ft.	95 ft.	89 dBA	**96 dBA**	85 dBA
R4	135 ft.	150 ft.	84 dBA	**92 dBA**	79 dBA
R5	270 ft.	285 ft.	78 dBA	87 dBA	73 dBA
R6	130 ft.	145 ft.	84 dBA	**92 dBA**	80 dBA

Source: CENSEO AV + Acoustics, 2019

TABLE 4-5: PREDICTED CONSTRUCTION NOISE LEVELS AT NEARBY RESIDENCES, SCENARIO 2 (AFFORDABLE SENIOR RENTAL APARTMENTS AND OFFICE BUILDING)

Noise—Sensitive Receiver	Distance from Residence to Project Area	Distance from Residence to Project Building	Earthwork Phase Noise Level	Building Phase Noise Level	Paving Phase Noise Level
R1	65 ft.	85 ft.	90 dBA	**97 dBA**	86 dBA
R2	55 ft.	70 ft.	**91 dBA**	**99 dBA**	87 dBA
R3	70 ft.	95 ft.	89 dBA	**96 dBA**	85 dBA
R4	135 ft.	150 ft.	84 dBA	**92 dBA**	79 dBA
R5	270 ft.	285 ft.	78 dBA	87 dBA	73 dBA
R6	130 ft.	145 ft.	84 dBA	**92 dBA**	80 dBA

Source: CENSEO AV + Acoustics, 2019

TABLE 4-6: PREDICTED CONSTRUCTION NOISE LEVELS AT NEARBY RESIDENCES, SCENARIO 3 (PARKING STRUCTURE)

Noise—Sensitive Receiver	Distance from Residence to Project Area	Distance from Residence to Project Building	Earthwork Phase Noise Level	Building Phase Noise Level	Paving Phase Noise Level
R1	60 ft.	80 ft.	90 dBA	**98 dBA**	86 dBA
R2	55 ft.	220 ft.	**91 dBA**	**92 dBA**	87 dBA
R3	70 ft.	95 ft.	89 dBA	**96 dBA**	85 dBA
R4	135 ft.	150 ft.	84 dBA	**92 dBA**	79 dBA
R5	270 ft.	285 ft.	78 dBA	87 dBA	73 dBA
R6	130 ft.	145 ft.	84 dBA	**92 dBA**	80 dBA

Source: CENSEO AV + Acoustics, 2019

Construction Vibration

The CENSEO study also discussed construction vibration associated with construction equipment used during the redevelopment. Vibration has the potential to result in damage to surrounding buildings and structures. Although predicting construction vibration was outside the scope of the CENSEO study, they noted that construction vibration should be considered, with particular attention paid to impact pile driver equipment.

4.3.3 MITIGATION

4.3.3.1 CONSTRUCTION NOISE MITIGATION

To keep noise levels below the recommended 90 dBA threshold, construction crews should refrain from using loud equipment or vehicles within 60 feet of adjacent residential properties. Pile driver noise is expected to exceed 90 dBA when used within 180 feet of a residence. If operations within these distances are unavoidable, noise impacts may be reduced by utilizing equipment intermittently or by blocking the line-of-sight from noise sources to noise-sensitive receivers with sound-absorbing barriers, material stockpiles, or other designed construction noise mitigation measures. Vehicles should be spread out over the project area and not all work close to the property line simultaneously. Additionally, noisy stationary equipment, such as generators, should be moved away from the project boundary. Particularly noisy tasks and tasks near existing adjacent residences should be separated throughout the work schedule when possible. All work must be done during approved construction hours unless a noise variance is approved.

Continuous plywood barriers are a commonly used noise barrier option due to the reasonably low cost to fabricate and acoustical effectiveness. However, a potential sound reflection path off the plywood barrier in the opposite direction should be considered. If barrier-reflected noise is an issue, quilted mass-loaded vinyl barriers are an effective noise mitigation option.

4.3.3.2 TRAFFIC NOISE MITIGATION

Once construction is completed, there is the potential for noise increases due to increased traffic associated with the redevelopment. The CENSEO study analyzed future traffic noise resulting from increased numbers of vehicles on surrounding roadways due to the project. These noise levels were found to be within 1 dB of existing and Year 2026 no-project sound levels. Therefore, traffic noise due to the project is not expected to adversely impact the existing adjacent residential properties.

4.3.3.3 CONSTRUCTION VIBRATION MITIGATION

If vibration from impact-type pile driving equipment or other construction equipment is disturbing to nearby residents and generating neighborhood complaints, these vibration inducing activities should be scheduled for the period during the day when the least number of residents are likely to be affected. Alternative equipment, such as vibratory pile drivers, or pre-drilling for piles may also decrease ground borne vibration levels.

4.4 Archaeological and Cultural Resources

4.4.1 ARCHAEOLOGICAL RESOURCES

An *Archaeological Literature Review and Field Inspection* (LRFI) was conducted by Cultural Surveys Hawaiʻi (October 2019) to support consultation with the State Historic Preservation Division (SHPD) for the Proposed Action and is included as Appendix B. The purpose of the 2019 LRFI was to determine through detailed historical, cultural and archaeological background research and a field inspection of the Project Area the likelihood that historic properties may be affected by the redevelopment. Based on the findings, the LRFI considered cultural resource management recommendations. The document is intended to facilitate the project's planning and support the historic preservation and environmental review compliance and consultation with the SHPD.

4.4.1.1 HISTORICAL BACKGROUND

The Project Area is currently considered to be within the *ahupuaʻa* (large land division) of Honolulu. However, in pre-contact times, Honolulu was only a small village and the *ahupuaʻa* of Pauoa probably once extended from the mountains to the shore, encompassing the eastern portion of what is now downtown Honolulu. In pre-contact times, the Project Area would have been considered to be within the *ahupuaʻa* of Pauoa, and within the *ili* (smaller land division) of ʻAuwaiolimu.

Pauoa Valley was associated with two famous invasions, including the Battle of Nuʻuanu in 1795 when Kamehameha invaded and conquered the island of Oʻahu. Six *Heiau* were located on Pūowaina (now known as Punchbowl), including two which were in the immediate vicinity of the Project Area. The *Heiau* acted as temples, forts, and as part of the complex for the priests of Pūowaina. All the *Heiau* around Punchbowl Crater were destroyed before the beginning of the twentieth century.

By the time of first contact with Europeans during the late eighteenth century (late 1700s), the area today referred to as downtown Honolulu—also known to the Hawaiians as Kou—had long been an area of population and activity on the south shore of Oʻahu. Kou included shoreward fishponds and irrigated fields fed by streams descending from Nuʻuanu and Pauoa Valleys. The current Project Area appears to have been outside the traditional areas of habitation and agriculture.

In the early to mid-1800s, development in Honolulu was in transition, in response to the pressures of a burgeoning western presence. The area experienced increasing commerce, urbanization and density of land use. In 1846, Honolulu was made the capitol of the Hawaiian Kingdom and was well on its way to becoming the commercial and political hub of the islands. By this time, western commercial and missionary interests had largely supplanted the Native Hawaiian traditions that previously shaped the environment. The current Project Area was considered to be just outside (north) of Honolulu town. As Honolulu expanded, it became necessary to provide water to the "dusty plains" east of Honolulu, and in 1894, a brick pumping station was built at the corner of Beretania and Alapaʻi Streets. The pumping plant was to be connected to a reservoir on the slope of Punchbowl.

A 1914 Sanborn Fire Insurance map shows the original brick pumping station at this, site, with two drilled wells to the west in the same lot. The remainder of the current Project Area was covered with single-family dwellings, a few small shops along Beretania Street and a factory for the Honolulu Wire Bed Company. Continued disruptions in the city water supply led to the creation of the Board of Water Supply in 1929. The original pumping station was replaced by a new station

that same year, followed by construction of the Engineering Building in 1939. The BWS Public Service Building was constructed in 1958.

The review of archival materials and previous archaeological studies referenced in the LRFI suggests that central Honolulu, which includes the present Project Area, may not have been intensively utilized or populated prior to Western Contact. The primary center of pre-contact population and agriculture in Honolulu was the coastline and the lands surrounding Nuʻuanu Stream. During the first decades after contact, other areas of Honolulu were developed in response to western commerce around the harbor and later the missionary settlement around Kawaiahaʻo Church. However, the area around Pūowaina was still described as a "barren and dusty plain" (Gilman 1903).

4.4.1.2 EXISTING CONDITIONS

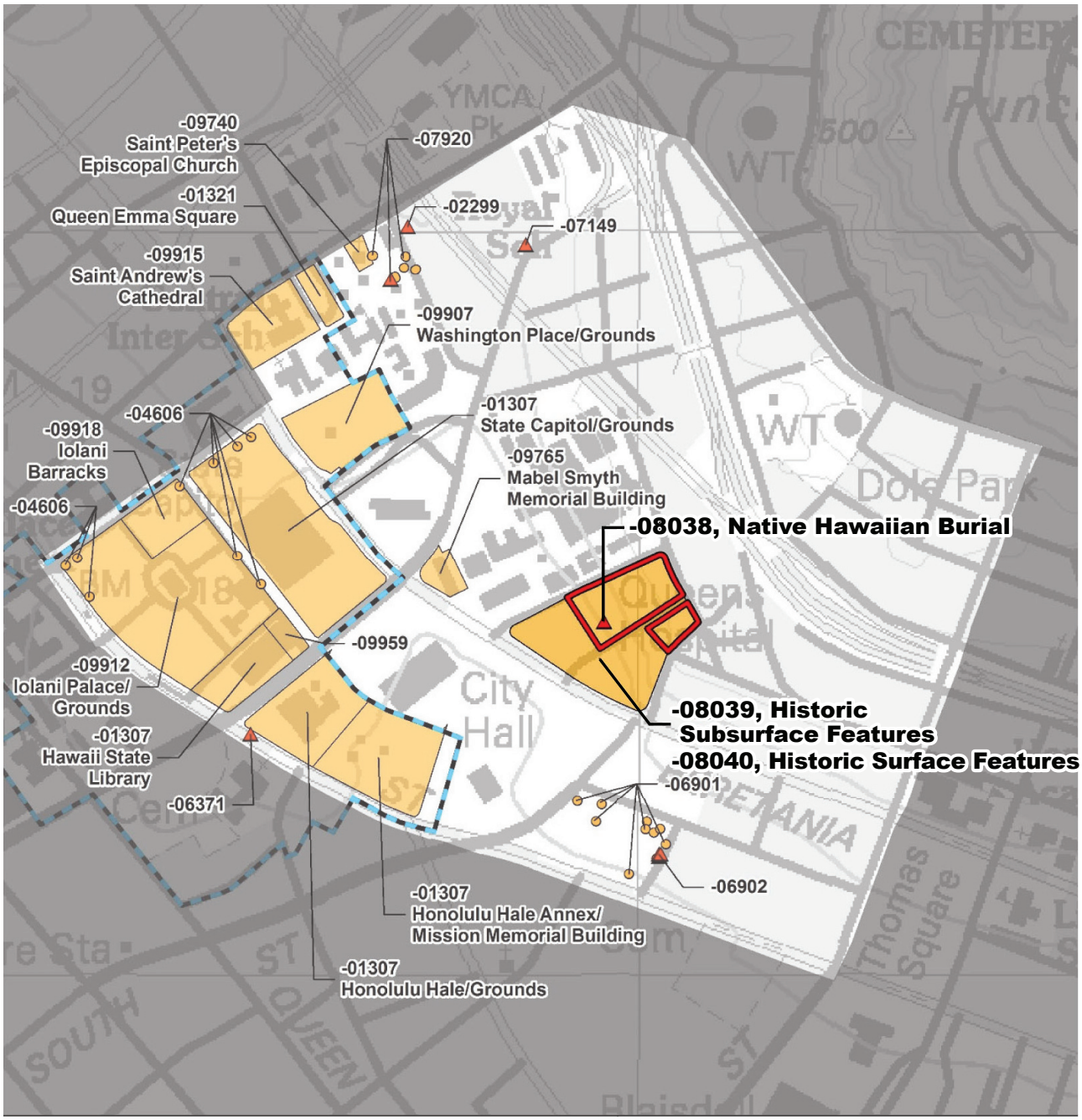
Previous Archaeological Research

The LRFI included a review of previous archaeological studies conducted in and around the Project Area, and these are shown in Figure 4-3 and described in the LRFI. Based on the archival and archeological record, predictive models in earlier archaeological studies rightly presumed a low probability of encountering pre-contact or early post-contact period Native Hawaiian subsurface cultural layers, features, or artifacts within the Project Area.

That said, a 2017 Archaeological Inventory Survey (AIS) (Clark et al, 2017) conducted for another BWS project encountered a Native Hawaiian human burial. The 2017 AIS was done in support of the proposed construction of photovoltaic (PV) arrays for a BWS energy savings project. The Area of Potential Effect (APE) for the 2017 AIS included areas north/northwest of Lisbon Street (TMK 2-1-036:005, ʻEwa Block), but did not include the area to the south of Lisbon Street (TMK 2-1-036:001, Diamond Head Block).

The 2017 AIS consisted of a pedestrian survey and subsurface testing program. Sixty-three archaeological features were identified during the AIS, including 44 above-ground features and 19 subsurface features identified within 21 test excavations. Three State Inventory of Historic Places (SIHP) numbers were assigned to the historic properties in the current Project Area:

- SIHP # 50-80-14-8038, a Native Hawaiian burial (Feature 1) encountered in a backhoe excavation; eligible under Criterion D (NRHP/HRHP) and significant under Criteria d and e.
- SIHP # 50-80-14-8039, historic subsurface features (Features 1-18) associated with residential use, and include possible pits, post molds, a concentration of rusted metal, and a cobble concentration. Eligible under Criterion D (NRHP/HRHP) and significant under Criterion d.
- SIHP # 50-80-14-8040, 44 historic surface features (Features 1-33, 33.1-33.8, 34-36) and three historic buildings (Features 37-39); eligible under Criteria A, C, and D (NRHP/HRHP) and significant under Criteria a, c, and d.



Legend

- Project Area
- Burial Site
- Historic Property
- SIHP # -01321 Hawaii Capital Historic District

Base Map: USGS Topographic Map, Honolulu (1998) Quadrangle
Data Sources: Cultural Surveys Hawaii, May 2019

0 700 Feet
0 175 Meters

Previously Identified Historic Properties **Figure 4-3**

Board of Water Supply Beretania Complex Redevelopment

Final Environmental Impact Statement

Board of Water Supply

All three historic properties are considered eligible for listing on both the Hawai'i Register of Historic Places (NRHP) and the National Register of Historic Places (NRHP).

Under HRS §6E8 and its implementing regulations, HAR §13-275-7(2), the AIS report recommended "effect with proposed mitigation commitments" in the form of preparation of a burial treatment plan (BTP) as well as archaeological monitoring for SIHP #50-80-14-8038 and the two other sites. Under Section 106 and its implementing regulations 36 CFR §800, the AIS report recommended "no adverse effect" on historic properties eligible for listing on the National Register of Historic Places (NRHP), as the mitigation commitments recommended under §6E would mitigate any adverse effect to the three historic properties.

In August 2018, a BTP for SIHP#50-80-14-8038 was approved by the O'ahu Island Burial Council (OIBC). Long-term protection and preservation measures included preservation of the burial in place, a burial preserve area with a buffer, a metes and bounds survey that recorded the preserve with the Bureau of Conveyance to create a permanent preservation easement, construction of an enclosure wall around the perimeter of the burial preserve, and establishment of site visitation protocols. The metes and bounds survey was performed on 5 June 2017 and the amended survey map and description of the burial site was recorded with the Bureau of Conveyances as Document A-69710552 on February 21, 2019. The original description and survey map were recorded as Document A-63830765 at the Bureau on June 23, 2017. A mathematical error required the revision and the amended survey map and description.

2019 Literature Review and Field Inspection (LRFI) Report

The fieldwork conducted by CSH for the LRFI included 100% coverage pedestrian inspection and was undertaken for historic property identification and documentation. The survey documented that the Project Area is completely and thoroughly developed into a modern landscape, and is covered with asphalt parking lots, concrete curbs and sidewalks, concrete and mortared basalt walls, and landscaped areas. The LRFI referred to the areas located within the 'Ewa Block as "Project Area 1," and the areas within the Diamond Head Block as "Project Area 2." These areas are shown with a red outline in Figure 4-3. Both project areas are surrounded by mortared basalt stone walls and project area 1 is also surrounded by an 8-foot high chain-link fence topped with three strands of barbed wire.

Project Area 1 is divided into two separate parking lots. The lower parking lot is used for both BWS vehicles and BWS staff, personal vehicle parking, and as a base yard and staging area for BWS equipment and materials. The upper terrace of project area 1 is a parking lot for BWS staff personal vehicles. It is built into a steeper slope than the lower parking area and is terraced into three separate parking levels that slope down to the southwest. The three terraces of the upper parking lot are separated by mortared basalt retaining walls.

Project Area 2 is a single, small level parking lot used for BWS staff personal vehicle parking. It is cut deeply into the hillside with a series of retaining walls along Lusitana, Alapa'i, and Lisbon Streets.

During the LRFI pedestrian inspection, all surface features of SIHP #50-80-14-8040 within project area 1 were confirmed, and it was noted the condition of the features remains unchanged since 2017. Project Area 2 was not included in the 2017 AIS. The 2018 pedestrian survey identified four new features (Features 40-43) of SIHP #50-80-14-8040. Photos of these features are included in the LRFI.

- Feature 40, a L-shaped, mortared basalt cobble and boulder retaining wall along the south edge of Project Area 2
- Feature 41, a mortared basalt cobble and boulder retaining wall running upslope along Lisbon Street and along Lusitana Street
- Feature 42, a mortared basalt cobble and boulder retaining wall that begins at the corner of Lisbon and Lusitana Streets (where it abuts Feature 41) and forms the upslope boundary of the parking lot, running along Lusitana Street and a portion of Alapaʻi Street
- Feature 43, a multi-tiered landscape planter below feature 42 constructed of mortared basalt, and running along the mauka edge of the parking lot in Project Area 2

LRFI Summary

Archival material and previous archaeological studies suggest that the Project Area and immediate surroundings may not have been intensively utilized or populated during the centuries prior to western contact. This is because populations were centered along the coastline and Nuʻuanu Stream. Extensive land modifications within the Project Area were also thought to have likely destroyed evidence of pre-and post-contact land use. For these reasons, predictive models suggested a low probability of encountering pre-contact or early post-contact period Native Hawaiian subsurface cultural layers, features (including human burials) and artifacts.

However, that was prior to the 2017 AIS within the current Project Area which encountered an unexpected Native Hawaiian human burial. The LRFI states that with the presence of SIHP #50-80-14-8038 (burial), it is now possible that additional subsurface pre-contact and early post-contact historic properties may exist. These could be either component features of SIHP #50-80-14-8038 and/or new historic properties. Evidence of pre-and early post-contact land use could be in the form of subsurface cultural layer(s) containing artifacts, midden, and/or human burials reflecting traditional Hawaiian occupation and/or activity

Despite previous intensive ground disturbance, the 2017 AIS found the presence of post-contact subsurface historic properties, cultural layers, and structural remains, and/or historic artifacts buried by modern and/or historic fill. In addition, the somewhat unexpected encounter with a Native Hawaiian human burial (SIHP #50-80-14-8038) demonstrated that there is the potential to encounter pre-or early post-contact historic properties, cultural layers, and/or artifacts below the modified surface.

4.4.1.3 POTENTIAL IMPACTS AND MITIGATION

Potential Impacts

Under HAR section 13-275-7 (Determining effects to significant historic properties), the LRFI determined that it is likely that the proposed Beretania Complex Redevelopment Project will have an effect on the three previously identified historic properties (SIHP #'s 50-80-14-8038, -8039, and -8040), the newly identified features of SIHP #50-80-14-8040, and on potential subsurface historic properties in areas not investigated by the 2017 AIS.

SIHP #50-80-14-8038, the Native Hawaiian burial, is located within the current Project Area (ʻEwa Block), in the vicinity of the parking structure proposed in all three development scenarios. The general location of the burial is shown in Figure 4-3. A burial treatment plan (BTP) was prepared for this site in consultation with recognized cultural descendants, the SHPD, and the OIBC. The BTP specifies preservation in place and the creation of a buffer zone around the burial.

In addition to the known historic properties within the Project Area, the LRFI concludes that it is possible that additional subsurface pre-contact and early post-contact historic properties may exist. These could either be component features of SIHP #50-80-14-8038 and/or new historic properties. This could impact the future redevelopment plan.

Mitigation

Mitigation for potential project impacts on historic properties include compliance with the BTP for SIHP #50-80-14-8038, as noted above; conducting a supplemental AIS; and implementation of an archaeological monitoring plan (AMP). In addition, the RFP will require that appropriate mitigation be developed and implemented in consultation with SHPD.

Compliance with Burial Treatment Plan for SIHP #50-80-14-8038. The redevelopment will be required to comply with the BTP previously accepted for SIHP #50-80-14-8038. This may impact the final design of any structure proposed in the vicinity. For example, the required buffer zone could impact the layout of the proposed parking structure. SHPD will need to be consulted to ensure that the proposed redevelopment is in conformance with the BTP.

Supplemental AIS. A supplemental AIS would involve subsurface testing in areas not already covered by the 2017 AIS, and in areas that may be disturbed by the proposed redevelopment. The location of test excavations for the supplemental AIS should be based on the proposed redevelopment plan. SHPD should be consulted as soon as possible to determine the appropriate scope of the supplemental AIS and the location and number of test excavations. It is anticipated that subsurface testing will be conducted with a combination of hand and backhoe excavations, with the purpose of identifying and documenting any subsurface historic properties that were not located by prior pedestrian inspection. The supplemental AIS would evaluate the redevelopment's effect on historic properties and include recommendations to mitigate potential adverse effects. Findings and recommendations would be submitted to SHPD for approval prior to construction.

Archaeological Monitoring. Archaeological monitoring should be implemented throughout ground disturbing activities. Archaeological monitoring is to be conducted for the purposes of historic property identification as a precautionary measure and because of the potential to encounter further human skeletal remains and burials. Prior to any ground disturbing activities, an AMP should be prepared that meets the requirements of HAR §13-279-4. The AMP should be reviewed and accepted by SHPD before ground disturbing work commences and implemented during construction.

Impacts to (Surface) Historic Architectural Features. The redevelopment of the Beretania Complex may have impacts to surface architectural features that comprise the significant and HRHP/NRHP-eligible SIHP #50-80-14-8040 (historic surface features). This will require mitigation, possibly in the form of Historic American Building Survey (HABS) documentation. Impacts to historic architecture were evaluated by Mason Architects and are discussed in Section 4.5 below.

4.4.2 CULTURAL IMPACT ASSESSMENT

A Draft Cultural Impact Assessment (CIA) was prepared by Cultural Surveys Hawai'i in 2019 to comply with the State environmental review process under HRS §343, which requires consideration of the project's potential effect on cultural beliefs, practices, and resources. Through document research and cultural consultation efforts, the CIA, included as Appendix C, provides information compiled to date pertinent to the assessment of the project's impacts to cultural beliefs,

practices and resources (pursuant to the Office of Environmental Quality Control's *Guideline for Assessing Cultural Impacts*), which may include traditional cultural properties (TCP). These TCPs may be significant historic properties under State of Hawaiʻi significance Criterion e, referring to historic properties that "have an important value to the native Hawaiian people or to another ethnic group of the state due to association with cultural practices once carried out, or still carried out, at the property or due to associations with traditional beliefs, events, or oral accounts—these associations being important to the group's history and cultural identify" (HAR §13-275-6 and §13-284-6).

As part of the CIA, CSH conducted community consultation and attempted to contact 89 Native Hawaiian Organizations (NHO), agencies, and community members. The purpose of the consultation was to gather information about cultural resources, cultural practices, and beliefs about the project area and surroundings. Of the seven people who responded, one provided written testimony and one participated in an in-person interview. A summary of their consultation is included in the CIA.

4.4.2.1 EXISTING CONDITIONS

The CIA provides a chronology of land use from pre-contact times to the establishment of the BWS in the early 20th century. Much of this information was previously summarized in Section 4.4.1.1 of this FEIS. The CIA also included a discussion of *kaʻao* and *moʻolelo* (legends and stories) of the area, traditional and historical accounts and previous archaeological research.

Mr. Chester Lao, former BWS geologist for over 30 years, shared his extensive knowledge of the history of the BWS and the Honolulu *ahupuaʻa.* Mr. Lao noted that historic maps indicate that the area was once comprised of wetlands and taro patches. He described Honolulu as a "gathering place," and recalled several of the numerous businesses in the Project Area vicinity, including Honolulu Auto Supply, Remington Rand, and a bowling alley.

A letter provided by Kiersten Faulkner on behalf of the Historic Hawaiʻi Foundation stated that the Beretania Complex is located "adjacent to the Hawaiʻi Capital Special District, which is listed on the National Register of Historic Places." The Project Area is also located adjacent to the Special District's sub-district, titled "Queens Medical Center Precinct." Both Mr. Lao and Historic Hawaiʻi Foundation mentioned the existence of an underground tunnel system and bomb shelter on the Project Area which were built during World War II.

4.4.2.2 POTENTIAL IMPACTS AND MITIGATION

During the community consultation, the interviewees provided the following comments and concerns:

1. The Beretania Complex is located adjacent to the Hawaiʻi Capital Special District and adjacent to the Special District's sub-district, titled "Queen's Medical Center Precinct." Historic Hawaiʻi Foundation recommended that the Area of Potential Effect (APE) assess off-site impacts to the larger Capital Special District and the adjacent historic BWS buildings.

2. Both interviewees mentioned the existence of an underground tunnel system and bomb shelter which were built on the BWS site during World War II. One interviewee believes that the existence, location, and condition of the tunnel system needs to be assessed.

Additional measures to protect historic resources include preparation of a preservation plan for the three historic BWS buildings, treatment guidelines for the World War II tunnels, and providing historic interpretation on the site.

3. Sensitive areas and key locations to be avoided or preserved should be identified during the planning stages of the redevelopment. Reconnaissance-level survey to identify probable subsurface cultural resources should be conducted prior to the selection of locations for new buildings.

4. BWS installed wells within the project area. These wells may need to be relocated as a result of the proposed project. (Note: this is not a cultural impact, but it was raised during the CIA consultation.)

5. Project Area includes known and likely Native Hawaiian burials. Construction workers and all other personnel involved in the construction and related activities should be informed of the possibility of inadvertent cultural finds, including human remains. In addition, in the event of an inadvertent discovery of human remains, the completion of a BTP in compliance with HAR §13-300 and HRS §6E-43, is recommended.

6. In the event that *iwi kūpuna* and/or cultural finds are encountered during construction, project proponents should consult with cultural and lineal descendants of the area to develop a reinterment plan and cultural preservation plan for proper cultural protocol, curation, and long-term maintenance.

4.5 Historic Resources

4.5.1 EXISTING CONDITIONS

Mason Architects, Inc. (MASON) prepared an *Historic Resources Evaluation* for the Beretania Complex (Appendix D). The report identified several historic resources that will be affected by the three potential scenarios. They include historic buildings and structures within the Beretania Complex identified as eligible for listing on the State and/or National Register of Historic Places (SRHP/NRHP), as well as two Historic Districts already in place.

4.5.1.1 BWS BERETANIA COMPLEX

As noted previously, the Beretania Complex is comprised of two blocks, the ʻEwa Block and the Diamond Head Block. There are several historic structures within the Beretania Complex—the Public Service Building is located on the ʻEwa Block fronting South Beretania Street; the Pumping Station and the Engineering Building are located on the makai portion of the Diamond Head Block.

The majority of the ʻEwa Block is taken up by three stepped parking lots with a total of 331 stalls. The Diamond Head Block has two parking areas with a total of 60 stalls, as well as a 25-stall parking area formed by the U-shaped Engineering Building. The parking areas include rock retaining walls, some of which pre-date the existing structures. MASON noted that historic landscapes and trees are located along South Beretania Street and north of the Public Service Building. A subterranean, World War II bomb shelter tunnel system is located to the north of the Engineering Building, mostly beneath the employee/visitor parking area and driveway connecting Alapaʻi and Lisbon Streets.

4.5.1.2 IDENTIFICATION OF HISTORIC PROPERTIES

Although the proposed redevelopment is limited to the portions of the Beretania Complex that are currently covered with surface parking, MASON defined a larger survey area for the historic resources survey, in order to capture potential adjacent historic resources. The survey area included the entire Beretania Complex, defined by South Beretania Street to the southwest, Lusitana Street to the northeast, Lauhala Street to the northwest, and Alapaʻi Street to the southeast. The project was also evaluated for its Area of Potential Effect (APE), which is defined by federal criteria as "the geographic area or areas within which an undertaking which may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist."

A total of four buildings, one underground tunnel system, one bridge, and various landscape features were identified within the survey area as historic resources. Remnant lava rock walls on the site, which are over 50 years old, have been determined to be not individually eligible for the SRHP or NRHP. The MASON evaluation identified the following historic resources:

- Pumping Station
- Pumping Station Annex
- Engineering Building
- World War II era Underground Bomb Shelter
- Public Service Building/Administration Building
- Landscape elements (fountain, palms, grass, shade trees)
- Overhead footbridge over Lisbon Street connecting Engineering and Public Service Buildings

A summary of these historic resources and an evaluation of their significance can be found in Table 4-7 below.

TABLE 4-7: HISTORIC RESOURCES SUMMARY

Building Address/TMK	Built	Significance Evaluation	Photo
Pumping Station TMK: (1) 2-1-036:004	1926-1927	Eligible for the State and National Registers: • Criterion A: Integral to the development of the city of Honolulu, and pumping station site since the 1890s • Criterion C: Restrained Beau Arts style	
Pumping Station Annex TMK: (1) 2-1-036:004	Btw. 1927 and 1938	Eligible for the State and National Registers: • Criterion A: Integral to the development of the city of Honolulu, and location of a pumping station since the 1890s	

Building Address/TMK	Built	Significance Evaluation	Photo
Engineering Building TMK: (1) 2-1-036:004	1939	Eligible for the State and National Registers: • Criterion A: Integral to the development Honolulu • Criterion B: Frederick C. Ohrt • Criterion C: Modernist style building designed by Hart Wood & Arthur J. Russell Architects	
Underground Bomb Shelter and Tunnel System (Located under the Engineering Building and the rear drive.)	Ca. 1942	Eligible for the State and National Registers: • Criterion A: Reflective of Honolulu's response to the December 7th, 1941, Japanese attack on Pearl Harbor • Criterion C: Distinctive underground construction indicative of expedited protective measures made on O'ahu after the attack.	
Building Address/TMK	**Built**	**Significance Evaluation**	**Photo**
Public Service Building (PSB) / Administration Building TMK: (1) 2-1-036:005	1958	Eligible for the State and National Registers: • Criterion A: Represents the modernization of Honolulu's water system and establishment of BWS • Criterion B: Frederick C. Ohrt • Criterion C: Modernist building by Wood, Weed, & Assoc. combines Western, Asian, Hawaiian motifs	
Landscape elements (Fountain, palms, grass, shade trees) at Public Service Building and Pumping Station	Varies	Not individually eligible, but eligible as contributing features to the Public Service Building and Pumping Station.	
Footbridge over Lisbon Street connects Engineering and Public Service Building	1957	Eligible for the State and National Registers: Criterion C: Elevated and curved pedestrian bridge by Wood, Weed, & Assoc. as part of the Public Service Building and Engineering Building, features Asian-inspired decorative motifs along the railings.	
Remnant lava rock walls	Varies	Not individually eligible for the National Register.	

Source: MASON 2019

The MASON *Historic Resources Evaluation* provides further description of the historic resources and their significance. Information is provided on the two notable people mentioned in the significance assessment: architect Hart Wood who designed the BWS Public Service Building; and Fred Ohrt, the first manager and chief engineer of the BWS from 1929 to 1952.

4.5.1.3 HISTORIC DISTRICTS

The *Historic Resources Evaluation* notes that the Beretania Complex is located near, but outside of, two National Register of Historic Places historic districts. These include the Hawaiʻi Capital Historic District, which was listed in 1978, and the Punchbowl Historic District (Puōwaina/National Memorial Cemetery of the Pacific), which was listed on the National Register of Historic Places in 1975.

In addition, the redevelopment is situated within or near two Special Districts (County zoning overlay districts), as discussed in Section 4.5.2.5.

4.5.2 POTENTIAL IMPACTS

4.5.2.1 EVALUATION OF EFFECTS ON HISTORIC PROPERTIES

The three proposed development scenarios discussed in Chapter 2 were evaluated for their effects on historic properties. When describing effects on historic properties, the Hawaiʻi Administrative Rules Chapter 13-275-7 (b) states that:

> *"Effects include, but are not limited to, partial or total destruction or alteration of the historic property, detrimental alteration of the properties' surrounding environment, detrimental visual, spatial, noise or atmospheric impingement, increasing access with the chances of resulting damage, and neglect resulting in deterioration or destruction."*

Effects to historic properties are federally defined by 36 CFR 800.5(1), Assessment of Adverse Effect and include undertakings that impact the integrity of a historic resource's location, design, setting, materials, workmanship, feeling, or association of a historic property. An adverse effect is found when an action alters, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP. Effects may include destruction, alteration, removal, change of use, change of setting—be that physical, visual or audible; neglect; or a transfer, sale or lease that could endanger long-term preservation of the resource.

The photograph in Figure 4-4 below shows an existing view of the BWS Beretania Complex from South Beretania Street. The existing view features an open sky backdrop behind the pedestrian bridge that spans the BWS Public Service Building (left) and the Engineering Building (right). Visual simulations for all three scenarios have been prepared. A simulation for Scenarios 1 and 2 is shown in Figure 4-5. A visual simulation showing two options for Scenario 3 is shown in Figure 4-6.

FIGURE 4-4: EXISTING VIEW FROM SOUTH BERETANIA STREET

Scenario 1: Assisted Care Living Facility and Office Building

Scenario 1 was described in Chapter 2 and shown in Figure 2-2. The main component of Scenario 1 is a 266-unit assisted living facility located in the northwest corner of the property. Parking for employees, residents, and guests of the assisted living facility would be provided in an adjacent 10-floor parking structure, which will include a total of 605 stalls. A visual simulation for Scenario 1 in Figure 4-5 shows the new 10-story parking structure which will be visible between the Public Service Building and the Engineering Building.

Scenario 2: Affordable Senior Rental Apartments and Office Building

Scenario 2, described in Chapter 2, includes senior rental apartments in the northwestern corner of the Beretania Complex. The concept plan in Figure 2-3 shows the building footprint for two 10-story apartments with 312 units, approximately 450 SF in size. Parking for residents and visitors would be provided in an adjacent 10-floor parking structure which will include a total of 605 stalls. The visual impacts of Scenario 2 from South Beretania Street are the same as for Scenario 1. The simulation in Figure 4-5 shows the 10-story parking structure which will be visible from South Beretania Street.

FIGURE 4-5: SCENARIOS 1 AND 2: VIEW FROM SOUTH BERETANIA STREET

Scenario 3: Parking Structure and Office Building

Under Scenario 3, described in Chapter 2 and shown in Figure 2-4, there would be no residential component on the property. The northwest corner of the property, near the intersection of Lauhala and Lusitana Streets, will remain as ground level parking. The proposed parking structure off Lauhala Street will be 10 floors but larger in footprint than Scenarios 1 and 2, with a total of 1,155 parking stalls. Approximately 178 stalls will be reserved for BWS use and the remainder will be available for lease.

Figure 4-6 simulates the visual impact of two options for Scenario 3. The first photo shows the visual impact of the parking structure as currently proposed and was shown in the site plan in Figure 2-4. The parking structure would completely dominate the view corridor between the Public Service Building and Engineering Building. The second photo shows how the visual impact from South Beretania Street could be lessened by modifying the orientation of the parking structure to reduce its width on the side facing South Beretania Street. Although the parking structure would have the same capacity, it would be more rectangular-in shape than originally proposed, with more frontage along Lauhala Street. This layout would reduce visual impact from South Beretania Street but would have a greater visual impact from Lauhala Street. However, its major disadvantage is the increased engineering and design challenges associated with the sloping topography of the site.

1. This reflects the parking garage location and orientation as presented in the site plan for Scenario 3.

2. Modifying the orientation of the parking garage by 90 degrees can lessen its visual impact from South Beretania Street. However, this may present other engineering challenges due to the sloping grade (i.e., topography) of the site.

FIGURE 4-6: TWO OPTIONS FOR SCENARIO 3

MASON evaluated each of the three development scenarios for their effect on historic properties. The evaluation of effect was similar for all three scenarios and is summarized in Table 4-8 below. None of the three scenarios propose physical alteration of the existing historic buildings. However, the evaluation of effect focused on the impact to the visual setting, i.e., the integrity of setting, feeling, and association, particularly as viewed from South Beretania Street

TABLE 4-8: EVALUATION OF EFFECT ON HISTORIC RESOURCES, SCENARIOS 1, 2 & 3

Historic Resource	Proposed Work	Evaluation of Effect
Underground Bomb Shelter and Tunnel System	**Scenarios 1, 2 & 3:** Construction of 10-story BWS Office Building and Parking Structure	**Scenarios 1, 2 & 3:** If site work and construction of the 10-story BWS Office Building and Parking Structure damage or demolish any portion of the historic underground tunnel system, it would be an adverse effect. Tunnel mapping should occur as part of the design phase.
Historic structures within BWS Beretania Complex are: Pumping Station & Annex, Engineering Building, and the Public Services Building, historic landscape elements (fountain), and footbridge.	Construction of: **Scenarios 1, 2 & 3**: 10-story parking structure **Scenario 1:** 10-story assisted care living facility—two towers **Scenario 2:** 10-story rental housing—two towers **Scenario 3:** 10-story parking structure **Scenarios 1, 2 & 3:** 10-story BWS Office Building and Parking Structure	**Scenarios 1 , 2, & 3:** Integrity of Location, Design, Materials, and Workmanship will retain intact since the buildings will not be moved or modified. **Scenarios 1 & 2:** Integrity of setting, feeling, and association will be adversely affected as viewed from South Beretania Street. The proposed 10-story parking structure would largely replace the open sky and palm tree backdrop that frames the low-rise BWS buildings and connecting bridge between the Engineering Building and the Public Service Building. The site's current open, low-rise character would be physically and visually changed. **Scenario 3:** Integrity of setting, feeling, and association will be adversely affected as viewed from South Beretania Street. The proposed parking structure would completely infill the open sky and palm tree backdrop that frames the low-rise BWS buildings and connecting bridge. The site's current open, low rise character would be physically and visually changed.

Source: MASON 2019

4.5.2.2 SPECIAL DISTRICTS

The project is located within, or near, two Special Districts: the Hawai‘i Capital Special District and the Punchbowl Special District. Special Districts are recognized under Chapter 21, Article 9, of the City and County of Honolulu Land Use Ordinance (LUO). Undertakings within Special Districts must adhere to design controls specific to them. Special Districts are also discussed in Chapter 5, Relationship to Land Use Laws, Plans, Policies and Controls.

Hawaii Capital Special District

The Beretania Complex site is located within the Hawaii Capital Special District, which is the civic core of state and Honolulu County government and contains many of Honolulu's landmark buildings. The boundaries of the Hawai‘i Capital Special District are shown in Chapter 5.

Per Section 21-9-30-1, this special district has two objectives:

a) *To provide safeguards for the preservation and enhancement of buildings and landmarks within the Hawaii capital special district which represent or reflect elements of the state's civic, aesthetic, cultural, social, economic, political, and architectural heritage, and encourage new development which is compatible with and complements those buildings and sites.*

b) *To preserve and enhance the park-like setting of the Hawaii capital special district, including its view from the Punchbowl lookout.*

The Beretania Complex is located within the Queen's Medical Center Precinct of the Hawai‘i Capital Special District. The objective of this precinct is *to minimize any adverse impact of new medical facilities on the Historic Precinct*. The Queen's Medical Center Precinct has a 100-foot height limitation, and a 40% open space requirement. All three scenarios of the redevelopment conform to the precinct height and open space requirements.

Punchbowl Special District

The Project Area is located outside of the Punchbowl Special District boundary but is within its designated sightlines. The Punchbowl Special District encompasses the National Memorial Cemetery of the Pacific within the crater, as well as portions of several neighborhoods located adjacent to the flanks of the crater. Figure 5-5 in Chapter 5 shows the boundaries of the Punchbowl Special District. Because the Project Area is located outside of this special district, there are no applicable district height restrictions.

The district's prime objective is to protect the Punchbowl monument as a dominant physical form within the island landscape. It calls to *preserve and enhance significant public views to and from Punchbowl, especially those from the Punchbowl lookouts and long-range views towards Punchbowl, by modifying construction projects that would diminish those views*.

Visual Impact from Punchbowl

Both the Hawai‘i Capital Special District and the Punchbowl Special District emphasize the importance of preserving and enhancing views from the Punchbowl lookouts. Visual simulations were prepared to evaluate the impact of the three development scenarios on the makai view from the Punchbowl Lookout. Figure 4-7 shows the existing view from this vantage point.

Figures 4-8 and 4-9 simulate the future view looking over the Hawai'i Capital Special District. The roofs of the new structures at the Beretania Complex are shown in green to differentiate them from the surrounding buildings. The photos show that the new buildings will be nearly indistinguishable in appearance, height and mass from the surrounding urban landscape. The views from the lookout are largely preserved, with only a minor noticeable change. In addition, the proposed project does not impact the park-like setting of the Hawaii Capital Special District, as specified in the District's objectives. In summary, there is no adverse impact on views toward or from Punchbowl.

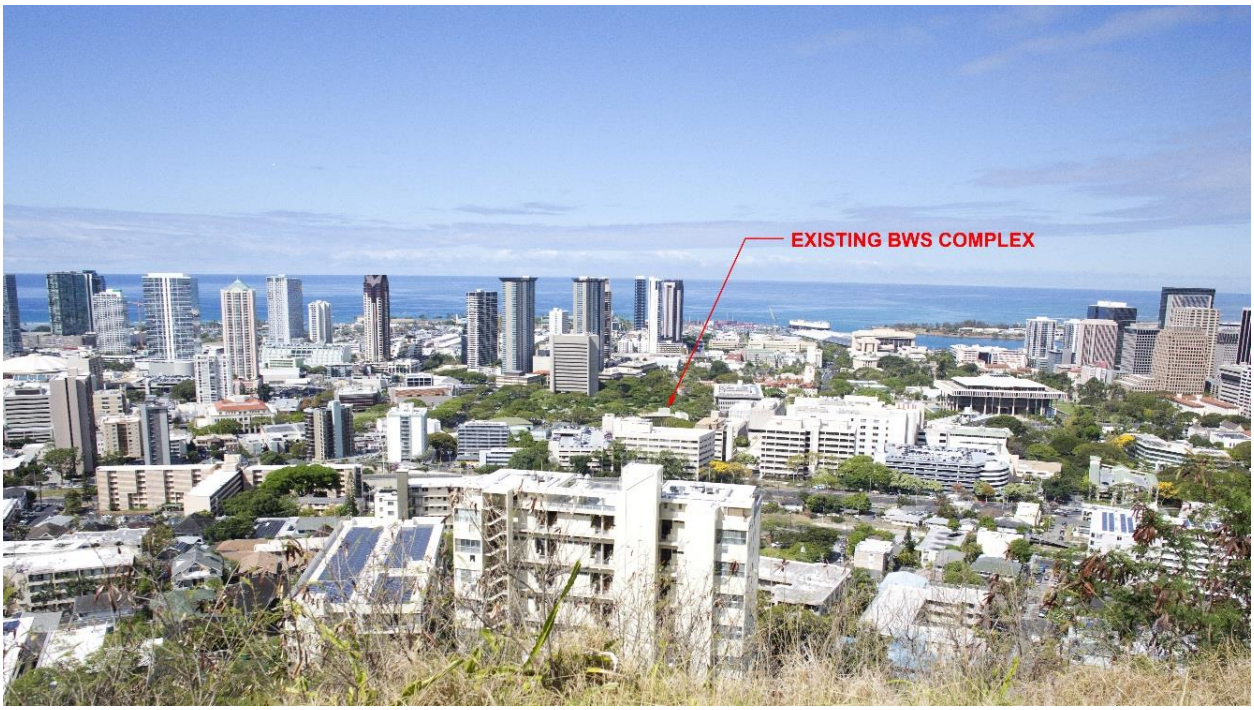


FIGURE 4-7: EXISTING MAKAI VIEW FROM PUNCHBOWL LOOKOUT

FIGURE 4-8: VIEW FROM PUNCHBOWL LOOKOUT WITH SCENARIOS 1 AND 2

1. This reflects the original orientation of the parking structure.

2. This represents an alternative Scenario 3, with the orientation of the parking structure turned by 90 degrees.

FIGURE 4-9: VIEW FROM PUNCHBOWL LOOKOUT WITH SCENARIO 3 (PARKING STRUCTURE & OFFICE BUILDING)

4.5.3 MITIGATION

Mitigation measures are required for adverse effect to historic resources, such as those identified in Table 4-8. Appropriate mitigation commitments and detailed mitigation plans will need to be developed in consultation with the SHPD and cannot be determined without SHPD involvement.

According to the HAR Chapter 13-275 (Rules Governing Procedures for Historic Preservation Review for Governmental Projects Covered Under Section 6E-7 and 6E-8 HRS), mitigation for an architectural resource may take the form of one or more of the following:

A. Preservation. Preservation may include avoidance of the effect and protection, rehabilitation, restoration, or reconstruction.

B. Architectural Recordation. Recordation involves the photographic documentation and possibly the creation of measured drawings of a building, structure or object prior to its alteration. Architectural recordation plans and photos shall meet the minimal standards as provided by Historic American Building Survey (HABS).

C. Historical Data Recovery. Data recovery involves researching historical source materials to document an adequate and reasonable amount of information about the property when a property will be altered or destroyed.

D. Ethnographic Documentation. Ethnographic documentation consists of interviewing knowledgeable individuals and researching historical materials to document an adequate and reasonable amount of information about the property.

4.5.3.1 PRESERVATION

As outlined in Item "A" above, "preservation" may include "avoidance of the effect." For this project, it may be possible to undertake design modifications to minimize the adverse effects of Scenarios 1 to 3. However, it may be difficult to avoid an adverse effect determination altogether without significant project changes.

Changes to the placement of the proposed buildings within the site could reduce their perceived mass and height when viewed from the South Beretania Street corridor. The design of the new buildings could be more consistent with the lower height of the historic BWS buildings by stepping back upper floors, while leaving lower floors to reflect base heights of the adjacent historic buildings. Paint colors for the new buildings should be different from, but compatible with, the iconic BWS green of the historic buildings. Appropriate landscaping could also soften adverse effects.

Prior to issuance of the RFP, BWS will work with historic architect MASON to develop design guidelines that will help avoid, minimize, and mitigate the impacts on historic and cultural resources. The proposed guidelines may include, but shall not be limited to, setbacks, open space requirements, landscape treatments, and exterior finishes and colors of new structures. These guidelines will be incorporated into the RFP and made a requirement of the redevelopment plan.

4.5.3.2 ARCHITECTURAL RECORDATION, HISTORICAL DATA RECOVERY, ETHNOGRAPHIC DOCUMENTATION

Architectural recordation, in the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), and Historic American Landscapes Survey (HALS) recordation and large-scale photography, would be an appropriate method to document the site before it is modified with the addition of new buildings. Architectural Recordation, Historical Data Recovery and Ethnographic Documentation may take the form of a HABS report, National Register Nomination, or other context study.

4.6 Visual and Scenic Resources

4.6.1 EXISTING CONDITIONS

The Beretania Complex is located on South Beretania Street, a major, highly traveled thoroughfare, and is in the vicinity of Queen's Medical Center. The Queen's Physician's Office Buildings (POB) 2 and 3, located on Lusitana Street and Lauhala Street, border the Beretania Complex. The Project Area, currently used by BWS for ground level parking, is not highly visible from South Beretania Street. Both the Diamond Head Block and 'Ewa Block portions of the Project Area are obscured by the Pumping Station and Public Service Building, respectively. As discussed in Section 4.5, looking mauka from South Beretania Street, the Project Area is visible through a view corridor between the Public Service Building and Engineering Building. The Project Area is visible to the public from Lauhala Street, Lusitania Street, and Alapaʻi Street. The Project Area is also visible to occupants of the surrounding medical office towers and high-rise apartments on Lusitana, Lunalilo, and Kinau Streets.

As noted previously, the Beretania Complex is within the Hawaiʻi Capital Special District, the center of State and municipal government that includes several landmark buildings in a park-like setting. The Beretania Complex is located less than a quarter mile from the Hawaiʻi State Capitol and from the Frank F. Fasi Municipal Building.

The Project Area's location on the lower slopes of Punchbowl, and within proximity to the Punchbowl Special District, and views from the site toward Punchbowl and city views from the Punchbowl lookouts are important for preservation. From the Project Area, the slopes of Punchbowl Crater are barely visible due to the surrounding high-rise buildings. The visual simulation of views from the Punchbowl (Figures 4-8 and 4-9) showed that future redevelopment of the Project Area will have minimal impact on views from Punchbowl.

4.6.2 POTENTIAL IMPACTS AND MITIGATION

The redevelopment of the Beretania Complex will replace expansive, paved parking areas with several new structures up to ten stories in height, including a parking structure, BWS office building, and assisted living facility or apartments. From South Beretania Street, much of the new development will continue to be obscured by the existing Public Service Building. However, as shown in the visual simulations in Section 4.5, the 10-story parking structure will have a negative effect on the mauka view corridor between the BWS Public Service Building and Engineering Building.

The new buildings will also be noticeable when viewed from adjacent public roads (Lusitana Street and Lauhala Street), and from the surrounding office towers and high-rise apartments. The Project

Area will be transformed from a paved and fenced parking area to a mix of high-rise structures interspersed with landscaped green spaces.

The visual simulations of the views from the Punchbowl Lookout (Figures 4-8 and 4-9) show that there will be little modification to the existing views from the lookout, and the new buildings will be consistent with the scale and use of design to minimize the visual intrusiveness.

Minimization of the visual impacts from South Beretania Street can be achieved through modifying the placement and orientation of buildings, utilizing setbacks, stepping back building facades, reducing building height and mass, appropriate selection of building materials and colors, visual screening, and the use of landscaping. Design mitigations to reduce visual impacts will be included in the RFP and minimizing the visual impact could be considered in BWS selection criteria of a redevelopment scenario.

4.7 Hazardous and Regulated Materials and Waste

4.7.1 EXISTING CONDITIONS

A search of available environmental records for the Beretania Complex was conducted by Environmental Data Resources, Inc. (EDR) in 2018. Environmental and historic records pertaining to properties within a one-mile radius of the Project Area were surveyed, including standard federal and State government data bases of known or potential sources of hazardous materials or waste. No sites of concern were identified within the current Project Area in any of the records surveyed by EDR.

In the past, underground storage tanks (UST) have been removed from areas of the Beretania Complex, outside the current Project Area. In 1992, six UST near the Pump Station building were permanently closed and several of them were removed. Two 10,000-gallon Bunker "C" USTs and associated piping were abandoned in place. One 500-gallon diesel UST and one 1,000-gallon diesel UST and associated piping were removed. Two 2,000-gallon unleaded gasoline USTs, associated piping and product dispenser island were removed. All tanks were abandoned in place and/or removed in accordance with federal and City and County of Honolulu regulations and guidelines.

A UST Closure Report dated April 14, 1993 was completed by Fuel Oil Polishing Company of Hawaiʻi (FOPCO) and concluded that four of the USTs did not have fuel releases, and that two gasoline USTs had releases apparently resulting from spills and overfills. The gasoline contaminated soils were subsequently over excavated, bagged, and shipped to a mainland landfill for disposal.

In a July 16, 1993 response to BWS, DOH concurred that "no further response action appears necessary at this time for [the gasoline UST] release event." DOH further stated that "if additional information and data in the future indicate that contaminants of concern are present at the site above certain levels which may have emanated from the former UST locations, then the Department of Health may require additional investigative and cleanup work to be performed as necessary."

In 2008, two other 2,500-gallon USTs (also outside the Project Area) were abandoned in place and closed. A *UST Closure Report* dated November 2008 was prepared by Kimura International and submitted to DOH. The report states that the USTs were closed in place due to electrical utilities along the UST excavation. Soil samples were taken and indicated that petroleum levels were non-detectable and below DOH action levels. In a February 28, 2011 letter to BWS, DOH concluded that

no further action was required for this release. The prior operation and closure of all USTs will have no impact on the current Project Area.

The Project Area has been used over the last several decades as paved parking for BWS employee vehicles, and BWS official vehicles and equipment. While no sites of concern were identified in the EDR search, it is likely that that past use has resulted in inadvertent releases of oil, fuel or other petroleum products onto the paved areas. It is expected that any releases would likely have been superficial and not present a threat to human health or the environment.

The American Society for Testing and Materials (ASTM) defines a recognized environmental condition (REC) as the "presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: 1) due to release to the environment; 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat of a future release to the environment." The ASTM defines *de minimis* conditions as environmental conditions that "generally do not present a threat to human health or the environment that generally would not be the subject of enforcement action if brought to the attention of appropriate governmental agencies." *De Minimis* conditions are not considered REC. Any inadvertent releases of petroleum products associated with use of the Project Area for vehicle parking are likely to be considered *de minimis* as defined by ASTM.

4.7.2 POTENTIAL IMPACTS AND MITIGATION

Redevelopment of the Project Area will require demolition of the paved parking area, fences, rock walls and other minor structures, site grading, and subsurface excavation. Installation of infrastructure and utilities will require excavation within roadway and utility rights-of-way and easements. All these activities have the potential to encounter hazardous materials, including lead and asbestos containing materials, and petroleum contaminated soils. The presence or absence of hazardous materials will need to be identified prior to construction and will need to be remediated and disposed of in accordance with State and federal regulations.

4.8 Social and Economic Factors

4.8.1 EXISTING CONDITIONS

4.8.1.1 POPULATION AND DEMOGRAPHIC PROFILE

According to data from the 2010 U.S. Census, the population of the State of Hawaiʻi was 1,360,301, with the population of the City and County of Honolulu (i.e., Island of Oʻahu) accounting for approximately 64 percent of those residents. In 2010, the population on Oʻahu was 876,156, which is a 9% increase since 2000.

The demographic data in Table 4-9 below is from the U.S. Census Bureau's American Community Survey (ACS) for 2010 and 2017. The ACS is an intercensal estimate of population, demographic, and housing information. ACS data is based on a sample of the population, in contrast to the decennial census, which is a complete count conducted once every ten years.

Given that the last U.S. Census was in 2010, the ACS data provides a more current profile of the population characteristics. Demographic, housing, and income data is presented for Census Tract (CT) 41, which includes the Project Area, and for the City and County of Honolulu as a whole. The boundaries of CT 41 are shown in Figure 4-10.

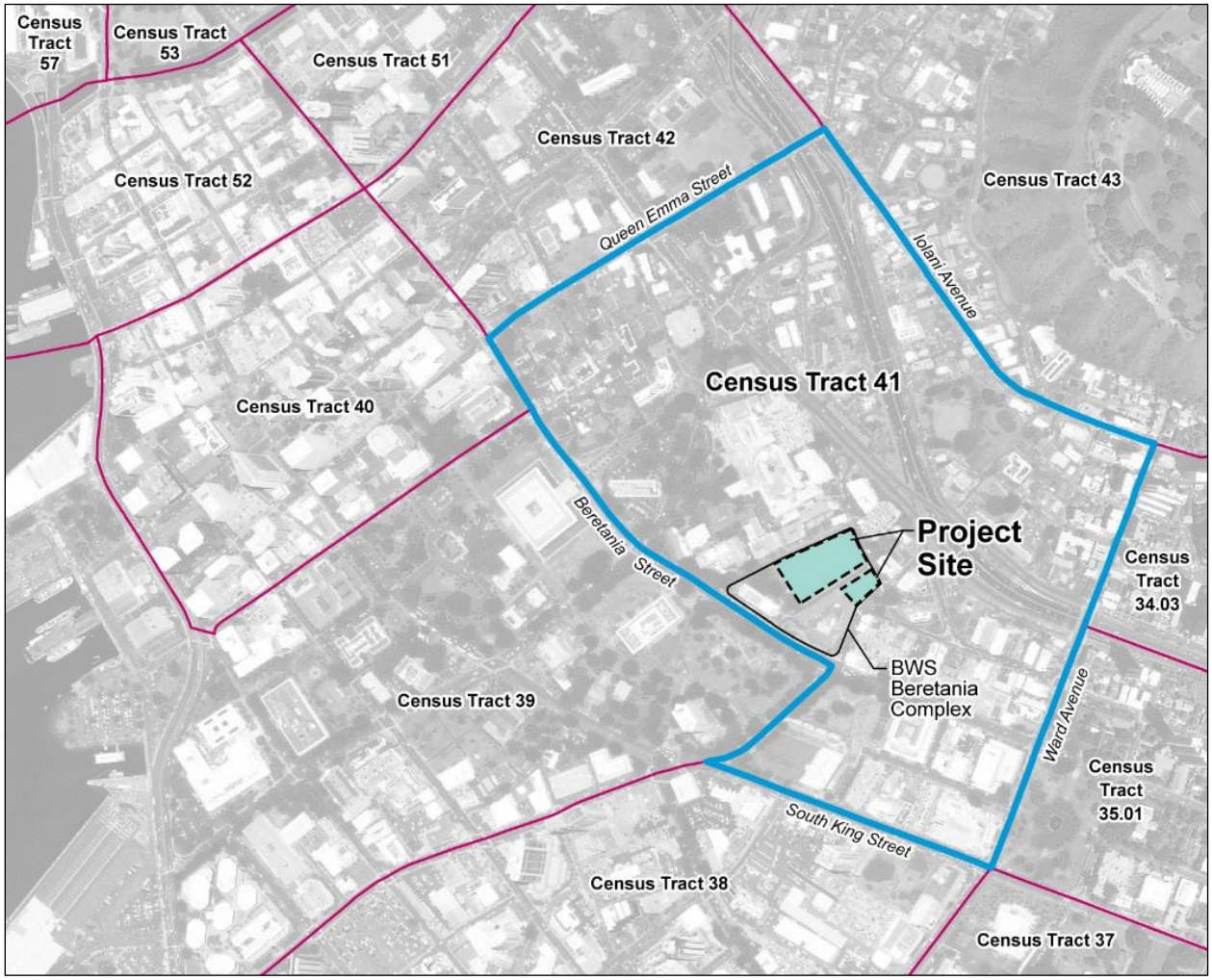


FIGURE 4-10: BOUNDARIES OF CENSUS TRACT 41

TABLE 4-9: DEMOGRAPHIC AND HOUSING ESTIMATES, 2010 AND 2017

	Census Tract (CT) 41		City and County of Honolulu	
	2010	2017	2010	2017
POPULATION				
Total Population	4,677	4,039	936,984	990,060
Median Age	37.4	39.8	37.5	37.6
Persons 65 yrs +	675	808	133,406	162,580
RACE				
One Race	3,848	3,294	734,061	760,701
Two+ Race	829	745	202,923	229,359
ONE RACE:				
White	910 (19.5%)	555 (13.7%)	197,515 (21.1%)	209,222 (21.1%)
Black or African American	140 (3.0%)	51 (1.3%)	18,733 (2.0%)	23,248 (2.3%)
American Indian & Alaskan	0	0	2,212 (0.2%)	1,391 (0.1%)
Asian	2,640 (56.4%)	1,875 (46.4%)	420,137 (44.8%)	424,558 (42.9%)
Native Hawn & Other Pac Islander	137 (2.9%)	813 (20.1%)	85,033 (9.1%)	92,743 (9.4%)
Other Race	21 (0.4%)	0	10,431 (1.1%)	9,539 (1.0%)
HOUSING				
Total Housing Units	2,336	2,519	334,812	346,374
HOUSING TENURE				
All Occupied Housing Units	2,220	2,254	304,827	311,451
Owner occupied	760 (34.2%)	583 (25.9%)	175,554 (57.6%)	173,242 (55.6%)
Renter occupied	1,460 (65.8%)	1,671 (74.1%)	129,273 (42.4%)	138,209 (44.4%)
INCOME				
Median Household* Income	$43,515	$51,915	$70,093	$80,078

**Note: A "household" consists of all people who occupy a housing unit regardless of relationship. A household may consist of a person living alone or multiple unrelated individuals or families living together (U.S. Census Bureau).*

Source: American Community Survey 2010 and 2017 five-year estimates

The ACS data shows that between 2010 and 2017, the City and County of Honolulu (i.e., Island of Oʻahu) experienced a population increase of about 5.7%. By comparison, the total population within CT 41 decreased by about 13.6% over this period. Of interest is the dramatic change in racial composition within the CT. Between 2010 and 2017, both the number and percentage of white and Asian residents in CT 41 decreased noticeably, while the Native Hawaiian and Pacific Islander group increased from 137 persons (2.9%) in 2010 to 813 persons (20.1%). ACS data for the Native Hawaiian and Pacific Islander category is subdivided into Native Hawaiian, Samoan, and Other Pacific Islander groups. While all three groups increased in number, the most significant increase appears to be in the "Other Pacific Islander" group, which increased from 43 to 395 persons during this seven-year period.

Despite the decrease in total population in CT 41, there was a 7.8% increase in total housing units between 2010 and 2017. The City and County of Honolulu, by comparison, showed a more modest 3.4% increase in total housing units in this same period.

ACS housing tenure data shows that CT 41 has a higher proportion of housing units that are renter occupied than owner occupied. For the County as a whole, the situation is reversed, with a slightly higher proportion of housing being owner occupied. In 2017, nearly 74% of the housing units in CT 41 were occupied by renters.

Median household income in CT 41 was substantially below the County-wide median for both 2010 and 2017. In 2017, median household income in CT 41 was $51,915, compared to $80,078 for the County as a whole.

4.8.1.2 DEMOGRAPHIC TREND—HAWAIʻI'S AGING POPULATION

The ACS data in Table 4-9 shows significant growth in the number of persons age 65 years and older between 2010 and 2017. This was the case in both CT 41 (19.7% increase) and the County as a whole (21.9% increase). An aging population is also occurring statewide.

According to the State Department of Business, Economic Development and Tourism (DBEDT)'s Population and Economic Projections for the State of Hawaiʻi to 2045 (DBEDT 2018), one of the most prominent population trends over the past several decades is the aging of Hawaiʻi's population. Hawaiʻi is growing older at a faster pace than the rest of the nation. According to DBEDT, the number of persons aged 65 years and older has increased an average of 3.3 percent a year, and the share of total population has increased from 7.9 percent in 1980 to 17.1 percent in 2016.

By 2030, 24% of Hawaiʻi's population will be aged 65 years or older, compared to 21% nationally. In Honolulu, 27% of residents will be 65 years and older by 2040. Between 2010 and 2040, Hawaiʻi's population 65 years and older will increase 104%, compared with the total population increase of 28% of the same period (Avalon, 2017). Several factors contribute to this demographic change: lower mortality rates, improved health access, and advances in medical and pharmaceutical technologies.

The data demonstrates that the percent of elderly over 65 years of age has exceeded the national average since 2000. Today, there are very few states with faster elderly population growth (Avalon, 2017). The *Market Assessment, Honolulu Board of Water Supply Beretania Campus Redevelopment* (Avalon, 2017) anticipates that based on these trends:

- Fixed-income elderly people will not have sufficient affordable housing options, and many may not find suitable housing to rent; and
- Those that seek residency in assisted care living facilities will likely shift their search to mainland options.

The State's shifting demographics also has implications for the overall economy. Higher numbers of older residents mean proportionately fewer younger residents, who are needed to generate goods and services and pay taxes. According to DBEDT, economic growth in the State is expected to be gradual over the coming decades, with the prospects for more rapid growth limited by the aging population. Real gross domestic product, the total value of goods produced, and services provided over one year, is projected to grow at 1.7% per year between 2016 and 2045. Hawai'i's total personal income is forecast to grow at an annual rate of 1.96% in real terms over this same period (DBEDT 2018).

4.8.1.3 MARKET ASSESSMENT

The *Market Assessment, Honolulu Board of Water Supply Beretania Campus Redevelopment* (Avalon Development, 2017) evaluated the market supply and demand for proposed land uses: senior housing (affordable apartment rentals and assisted care living), office space, and parking facilities. The major findings are summarized below, and more detail can be found in the *Market Assessment* in Appendix E:

Affordable Senior Rentals

- Demand for affordable senior rentals is outgrowing supply at a substantial rate. On O'ahu, affordable senior apartment vacancy rates are currently below 1%.
- Absorption of newly delivered apartment product over the last 20 years has been fairly quick, keeping the vacancy rates under 1% historically. At some facilities, prospective residents are on wait lists for as long as 3 years.
- Most affordable senior rentals feature 1-bedroom layouts in the range of 375 to 435 SF.
- Avalon's survey of existing affordable senior rental properties yields current rents of $500 to $1,200 per month for properties qualifying in the range of 50 to 80% of the area median income (AMI).
- Most affordable senior rentals have experienced 1 to 3% annual increases in rent historically although most do not approach the maximum rents allowed under applicable LIHTC (Low Income Housing Tax Credit) rules and regulations for rent control.

Assisted Care Living

- On O'ahu, assisted care living vacancy rates are currently below 14% due in large part to the introduction of the 196-bed Kalakaua Gardens in 2016. Historically over the last 20 years, vacancy rates for these facilities have fluctuated between 7 to 10% due to the absorption of new inventory. Currently, some facilities have wait lists for prospective residents as long as 3 years.
- Nationally, the U.S. is experiencing a slight excess in the supply of assisted care living product. Some national assisted care living providers have been experiencing unprecedented availabilities in some key markets in the continental U.S., creating some heightened competitive pressure in those markets for 2017. National assisted care living providers are now focused on differentiating themselves to fill vacancies. One way of

differentiating themselves is by providing assistance to seniors in their own homes before a transition to a senior community is both desired and necessary.

- Assisted care living options in Honolulu usually offer one-bedroom units in the range of 400 to 510 SF depending on the community. Such communities feature a wide variety of services ranging from independent living up to memory care.

Economics

- The state's cost of living is 16% higher than the national average. This is clearly evident in home ownership and rental costs. As of June 2017, the median price of a single-family house on O'ahu was $735,000, up 5.0% from the year before and up 16.7% from 10 years ago. The median price of a condominium was $390,000, up 8.3% from the year before and up 25.8% from 10 years ago. The average cost of renting a two-bedroom apartment in Honolulu is currently $2,300 a month, about 42% higher than the national average.

Office Space & Parking Facilities

- The Honolulu office market saw a 54,000 square foot (SF) gain in office space from year end 2015 to 2016 dropping the vacancy rate from 13.5% down to 13.1%.
- Honolulu's Class-A market saw a vacancy drop from 14.3% to 14.2% from year end 2015 to 2016. Gross asking rents have slightly increased from $3.29 per SF per month to $3.32, mostly attributed to increases in operating expenses.
- 575 office spaces remain available at year end 2016 compared to 582 in 2015.
- Office base rents in the range of $1.59 to $1.69 per SF per month and current vacancy rates fail to meet minimum income thresholds for the financing of new office product.
- At the height of the real estate boom in 2007, vacancy rates declined to single-digit percentage levels. After the crash of 2008, vacancy rates have been floating in the low to mid teen percentages. Rent growth seems to be stagnant as operating expense increases over the last 10 years have eaten up a considerable share of gross asking rents.
- New trends in "co-working" concepts whereas multiple companies and professionals work out of a single office environment with common office infrastructure is all the rage in technology and science office space users. This has impacted office leasing and vacancy rates.
- Parking availability in the Honolulu Downtown Central Business District is next to zero with most facilities having wait lists for availabilities. Parking rates range from $220 to $290 per stall per month.

4.8.2 POTENTIAL IMPACTS AND MITIGATION

4.8.2.1 MARKET IMPACT

There is clearly strong market demand for both of the housing options considered for the redevelopment, particularly affordable senior rentals, due to the rapidly aging population of O'ahu, combined with existing high rents and limited new housing inventory.

The Avalon *Market Assessment* concluded that the O'ahu market for assisted care living is significantly underserved, and an Assisted Care living facility will likely capture a considerable share of the unserved local market, as well as some migrating seniors (i.e., mainland U.S.). It is expected that the market for future housing at the Beretania Complex will be the Island of O'ahu

(i.e., City and County), and in particular, individuals currently residing in O'ahu's Primary Urban Center. By responding to an existing need, the development of senior rental housing or assisted care living options would have a positive socio-economic impact.

The *Market Assessment* also documented strong demand for parking facilities serving nearby State and City government offices. All the development scenarios include the provision of additional BWS offices. This responds to a future need by BWS and would have a positive impact on agency operations and its ability to accomplish its mission.

4.8.2.2 EMPLOYMENT AND ECONOMIC IMPACTS

All three development scenarios will generate varying levels of ongoing economic and fiscal benefits for Hawai'i residents, as well as for City and State governments. The development scenarios would generate spending, employment, and consequent income and taxes. This economic activity is expected to support long-term impacts, including additional consumer expenditures, employment opportunities, personal income, and government revenue enhancement. The following summary is from Avalon's 2019 *Economic and Fiscal Impact Assessment* (see Appendix F):

Development Employment

- **FTE Employment**—The development of each scenario is estimated to generate 200 to 400 full-time equivalent (FTE) jobs annually, including positions created directly and indirectly by the development activities. Such jobs are expected to be located primarily on O'ahu.
- **Personal Earnings**—New development-related positions are expected to be associated with total personal earnings of some $11.3 to $22.5 million per year during design and construction. These earnings represent an average of $75,600 per FTE job, including direct construction-related jobs as well as the indirect and induced opportunities created throughout the economy. The many jobs created directly by the redevelopment are expected to enjoy higher salaries than these averages.

Operational Employment

- **On-Site Jobs**—Operationally-speaking, there is a significant difference between the scenarios in terms of employment. The Assisted Care Living concept will likely require up to 43 direct FTE's until stabilization. The Affordable Senior Rental and Parking Structure scenarios have little in terms of human resource needs, as both concepts represent real estate assets that are managed by a small group of people. The direct impact of these individuals is negligible.
- **FTE Employment**—Considering the redevelopment's direct, indirect and induced impacts statewide, only the Assisted Care Living scenario has the potential of generating possible additional employment State-wide. These "net new" jobs could include vendor services such as food delivery; however it is generally assumed that such positions generated throughout the economy via indirect and induced economic factors is minimal and negligible due to the all-inclusive employment nature of the Assisted Care Living model.
- **Personal Earnings**—The evaluation of personal earnings is based on the island- wide net new jobs explained above. Net new personal earnings for local employees for the Assisted Care Living scenario are projected at about $2.2 million by the time doors open to the public. By 2027 and thereafter, with assisted care living operations stabilized, net new personal earnings for local residents are projected to total about $3.8 million per year.

On average, these net new FTE positions are expected to earn about $84,500 each between 2024 and 2026 during the lease-up of available units and the operations of the Assisted Care facility, and about $88,000 per year thereafter, when all activities have been stabilized. The Affordable Senior Rentals and Parking Structure scenarios yield negligible earnings for the purpose of calculating tax revenue.

4.8.2.3 POPULATION IMPACTS

The *Economic and Fiscal Impact Assessment* states that employment opportunities created by the development scenarios are likely to create incentives for some out-of-state residents, including former Hawaii residents, to move to Oʻahu. It estimated that up to 5% of the construction labor force, and a small share of the operations-related positions may be filled by persons from out-of-state. During project development and initial leasing, up to 10 persons may move to Hawaiʻi because of the redevelopment.

4.8.2.4 FISCAL AND OTHER PUBLIC IMPACTS

The three development scenarios evaluated present different opportunities to meet the need for housing and parking. Given the location of the Beretania Complex adjacent to Queen's Medical Center, both the Assisted Care Living and the Senior Apartment Rental scenarios are complimentary uses to existing medical care services. The Parking Structure scenario fulfills a major need for additional parking in the area, given the concentration of government offices and medical facilities nearby.

All three scenarios will generate more real property tax and gross excise taxes. Income taxes on the other hand would only see significant gains under the Assisted Care Living scenario, with its significant human resource need.

Redevelopment is also expected to generate the following fiscal and other public benefits:

- **County**—Increased real property taxes will be the major driver of fiscal impacts for the County. The scenarios are expected to generate revenues starting within a year after the commencement of operations. Avalon estimated annual real property taxes at $382,000 for the Assisted Care Living scenario; $377,000 for the Affordable Senior Rental scenario; and $362,000 for the Parking Structure scenario (based on net assessed value).
- **State**—For the State, net additional operating revenues generated by the development scenarios are generated primarily through employment income tax. Although the Assisted Care Living scenario is assumed to reach an estimated 43 employees at stabilization with $3.8 million per year, the Senior Apartment Rental scenario and the Parking Structure scenario have minimal need for human resources, and therefore will generate minimal (if any) income tax revenue for the State. Since the scenarios do not involve the sale of any real estate product, no conveyance tax income will be generated.

4.9 Infrastructure and Utilities

The Project Area is in a highly urbanized area that is well served by public services and utilities. Sewer service to the area is provided by the City and County of Honolulu and water service is provided by BWS. Hawaiian Electric Company provides electrical service through underground conduits, telephone service is provided by Hawaiian Telcom and cable service is available through

Spectrum Hawaiʻi (Spectrum). The following sections address utility and infrastructure components of the project.

4.9.1 ELECTRICAL AND COMMUNICATIONS

4.9.1.1 EXISTING CONDITIONS

Electrical (Power) System

An analysis of electrical and telecommunications infrastructure was conducted by ECS, Inc. (Appendix G) to identify potential modifications/upgrades which may be needed to support the proposed redevelopment. The study looked at electrical (power), telecommunications (telephone, cable television and internet/data) and City and County of Honolulu street lighting systems.

Electrical (power) service to customers in the project vicinity is provided by Hawaiian Electric (HECO) and is either distributed overhead on joint use utility poles or underground via ductline and manhole/handhole systems. Existing HECO distribution systems are located within road rights-of-way or utility easements, as shown in Figure 4-11.

The HECO distribution system along South Beretania Street between, Alapaʻi Street and Lauhala Street, consists of three (3) underground 11.5 kV circuits. Two (2) of the three (3) underground 11.5 kV circuits along South Beretania Street extend underground, along the Alapaʻi Street frontage of the BWS complex. The two (2) underground 11.5 kV circuits along Alapaʻi Street are used to serve the outdoor HECO substation located along the Alapaʻi Street side of the BWS Pump Building. This substation consists of three (3) 500 kVA transformers which supply 4.16/2.14 kV power to support the Pump Building equipment.

Two (2) of the three (3) underground 11.5 kV circuits along South Beretania Street are tapped and extend underground along Lauhala Street and extend through to Lusitana Street. These 11.5 kV circuits utilize #4/0 copper conductors. HECO records indicate that the existing 11.5 kV ductline appears to consist of transite conduits. The two (2) underground 11.5 kV circuits along Lauhala Street are tapped to serve various customers along Lauhala Street, including the BWS Public Service Building. The 11.5 kV circuits terminate at indoor switchgear located in the basement of the Public Service Building. Dual 11.5 kV feeders extend from the switchgear to serve the BWS Engineering Building and Pump Station building.

Existing Electrical/Telecommunications System **Figure 4-11**

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HECO customers along Lusitana Street are served from the overhead joint use pole line which runs along Lusitana Street. The pole line consists of one 12.47 kV, 336 AL circuit and secondary lines. Pole mounted transformers are utilized to step the 12.47 kV distribution voltage down to secondary utilization voltages. The joint use poles support overhead or underground secondary circuits which distribute power from the pole mounted transformers to various customers. For larger customers, a primary 12.47 kV feeder is extended underground to their properties for use with a HECO pad-mounted transformer. This 12.47 kV circuit also extends overhead along Alapaʻi Street and Lauhala Street. HECO has no distribution circuits along Lisbon Street.

Telecommunications Systems

Telephone, cable television and related telecommunications services are provided to customers in the project vicinity by Hawaiian Telcom (HT) and Spectrum. Both HT and Spectrum are capable of providing voice, internet and other telecommunications services.

The existing HT and Spectrum telecommunications cables generally run underground and follow the path of the HECO underground distribution system along South Beretania Street, Alapaʻi Street and Lauhala Street. In addition, HT and Spectrum have telecommunications cables that run overhead on the portion of the joint pole line along Lusitana Street and Alapaʻi Street. HT also has smaller underground distribution cables along Lisbon Street.

Hawaiian Telcom's overhead and underground distribution systems consist of a combination of fiber optic and copper cables. Similarly, Spectrum's overhead and underground distribution systems consist of fiber and coaxial cables.

Existing BWS facilities utilize a combination of overhead and underground services from HT and Spectrum. Existing telephone service is provided from HT's distribution system along South Beretania Street. High speed data service is provided via fiber optic cabling from HT's infrastructure along Lisbon Street and terminates within the existing BWS data center in the Pump Building. Secondary high-speed data service is provided from Spectrum, terminates at the BWS Engineering Building, and is then routed to the BWS data center in the Pump Building. Cable television service is obtained from Spectrum infrastructure along Lisbon Street and provided to select executive offices on the third floor of the BWS Public Service Building.

Street Lighting System

The City and County of Honolulu street lighting systems along South Beretania Street, Lauhala Street and portion of Lusitana Street (ʻEwa of Lisbon Street) consist of full-cutoff, "cobra head" type luminaires with LED lamps and metal street light standards. Power for the street lights is distributed via an underground street lighting distribution system.

4.9.1.2 POTENTIAL IMPACTS AND MITIGATION

Electrical System

Electrical (power) utility connection points for the proposed redevelopment will likely be from underground circuits along Lauhala and Alapaʻi Streets. HECO has preliminarily indicated that extension of new circuits into the area or upgrade of existing circuits may be necessary to support the proposed redevelopment. The extension/upgrade of HECO circuits may also require the construction of new underground infrastructure (ductlines and manholes/handholes), particularly

along Lauhala Street where the existing transite ductline may need to be replaced if existing cables are upgraded or replaced.

Information on the specific development plan will need to be coordinated with HECO to confirm the adequacy of existing circuits and the extent of any upgrades to HECO's distribution system. A detailed evaluation of circuit capacity will be performed during the design phase, when service request(s) for the redevelopment are submitted to HECO.

It is assumed that new HECO pad mounted transformers will be utilized to support the project loads associated with the various buildings and facilities proposed at the Beretania Complex. HECO may also require pad mounted primary switches for the transformers. Locations of the transformers and primary switches will be determined as site development plans are further refined.

The feasibility of placing the Alapaʻi Street and Lusitana Street utility systems underground will require significant coordination and discussion with HECO to identify infrastructure requirements and HECO design and construction costs associated with such undergrounding work. Although HECO will perform the actual removal of overhead circuits and installation of underground conductors, the cost for undergrounding existing overhead circuits will be charged to the customer.

Telecommunications System

Possible telecommunications utility connection points for the proposed redevelopment will likely be from underground circuits along Lauhala and Alapaʻi Streets. Hawaiian Telcom (HT) and Spectrum have not yet confirmed whether their existing fiber optic facilities in the Project Area have sufficient capacity to support the redevelopment. Verification of available capacity and identification of upgrades to existing facilities that are required will have to be coordinated with both HT and Spectrum.

It is anticipated that new underground infrastructure consisting of ductline, manholes and/or handholes will be extended from the existing HT and Spectrum underground distribution systems along Lauhala Street to support telecommunications services for the proposed redevelopment. Assuming the future BWS office building is sited on the Diamond Head block (between Lisbon and Alapaʻi Streets), telecommunications services will be extended from the BWS data center at the Pump Building to the proposed new office building via new underground infrastructure. If additional commercial telecommunications services are desired for the new office building, it is expected that new underground infrastructure can be extended from HT and Spectrum's existing underground distribution systems along Lisbon Street or Alapaʻi Street. Specific service points of connection to the HT and Spectrum underground distribution systems will be confirmed as site development plans are further refined and the types of telecommunications services desired are identified.

The feasibility of placing the Alapaʻi Street and Lusitana Street utility systems underground will require significant coordination and discussion with HT and Spectrum to identify infrastructure requirements and utility company design and construction costs associated with such undergrounding work. Although HT and Spectrum will perform the actual removal of overhead circuits and installation of underground conductors, the cost for undergrounding of existing overhead circuits will be charged to the customer.

Street Lighting System

The City street lighting systems along Alapaʻi Street and Lusitana Street, between Lisbon Street and Alapaʻi Street, consist of full cutoff, "cobra head" type luminaires with mast arms mounted to joint use wood poles. The street lights utilize LED lamps. Power for these street lights originate directly from the HECO secondary lines. There are no City street lights along Lisbon Street.

No work or upgrade to the existing City street lighting system along South Beretania Street is envisioned, as street frontages along the proposed development do not have direct access to South Beretania Street. Modifications to the existing street lighting systems along Alapaʻi Street, Lauhala Street and/or Lusitana Streets may be required to accommodate new driveways to any new frontages along these roadways.

New street lighting systems will consist of metal street light standards, which conform to City standards. The typical City street light standard consists of a galvanized steel light pole with transformer base, galvanized steel bracket arm, "cobra head" street light luminaires with full cutoff reflectors, LED lamps and networked wireless lighting control nodes. Power for the street lighting system will need to be supplied by new underground secondary lighting circuits, which will consist of ductline, pullboxes and conductors.

If undergrounding of the utility pole line along Alapaʻi Street or Lusitana Street is pursued, the existing street light luminaires mounted on the wood poles will be removed, and metal street light standards, which conform to City standards will need to be provided along with a new underground street lighting distribution system.

4.9.2 DRINKING WATER

4.9.2.1 EXISTING CONDITIONS

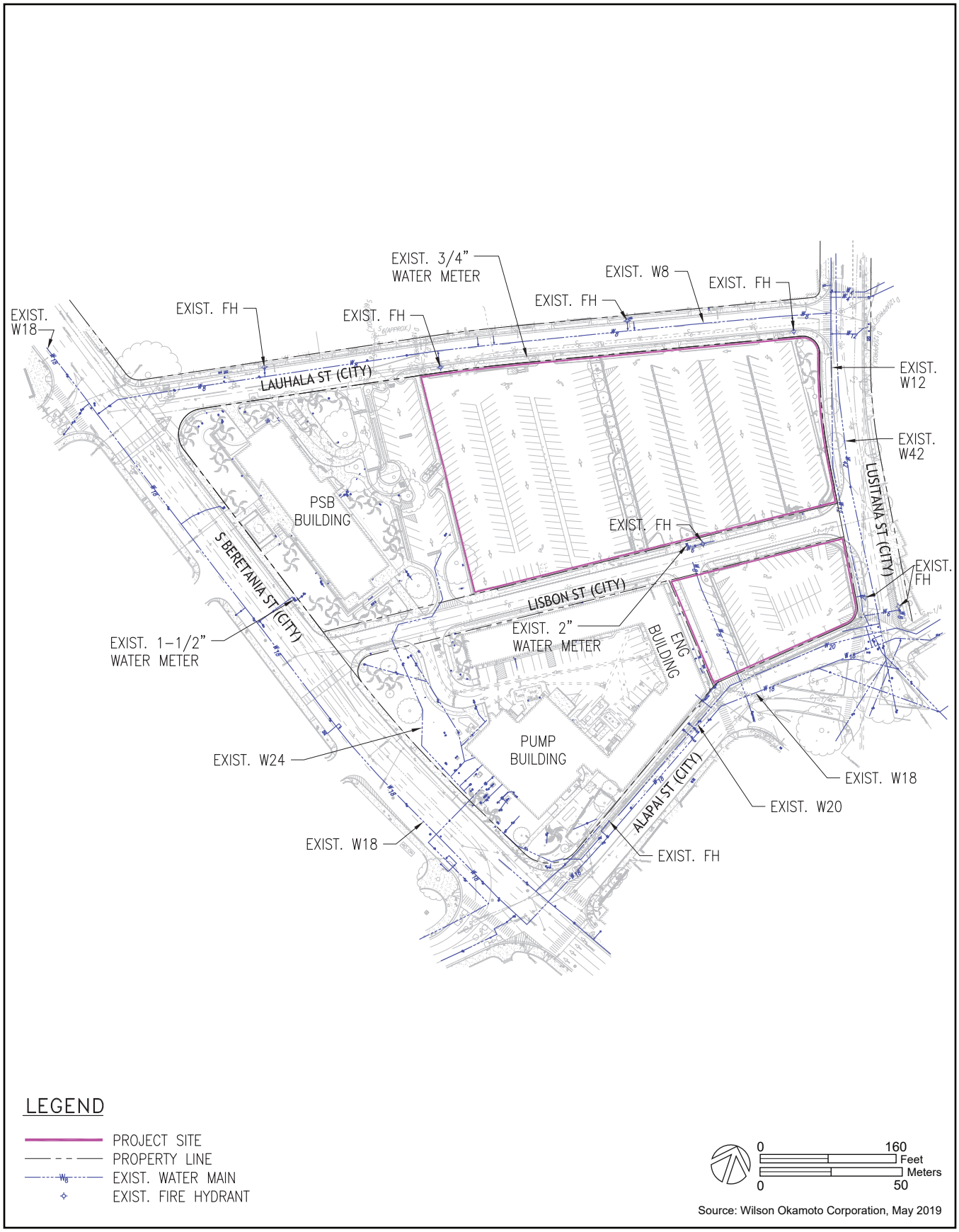
Water for domestic use and fire protection is provided to the Beretania Complex and surrounding vicinity through the municipal water system. The BWS water system in the vicinity of the project site consists of a system of distribution mains and fire hydrants and is illustrated in Figure 4-12. BWS record drawings and facility maps indicate an existing 8-inch water line and four existing fire hydrants on Lauhala Street, a 12-inch and 42-inch water line and two hydrants on Lusitana Street, an 18-inch and 20-inch waterline and one hydrant along Alapaʻi Street, and an 8-inch waterline that crosses through the Diamond Head Block and connects to a hydrant on Lisbon Street.

BWS records show three existing water meters servicing the ʻEwa Block: a 1½-inch meter on South Beretania Street, a ¾-inch meter on Lauhala Street, and a 2-inch meter on Lisbon Street. There are no existing water meters currently servicing the Diamond Head Block.

4.9.2.2 POTENTIAL IMPACTS AND MITIGATION

Connection to Board of Water Supply System

On September 14, 2017, a letter was submitted to BWS requesting information on the availability of water for the project and water pressure information for fire hydrants in the vicinity of the Project Area. This initial letter was based on programming for the various redevelopment scenarios and the estimated average daily water demand shown below (supporting calculations can be found in the Civil Engineering PER, Appendix H).



Source: Wilson Okamoto Corporation, May 2019

Existing Water System **Figure 4-12**

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On October 2, 2017, BWS responded stating that based on current data, the existing water system is adequate to accommodate the proposed redevelopment scenarios. BWS record information indicates the water system has a calculated fire flow capacity of 4,000 gallons per minute. The final decision on the availability of water, however, would be made when the building permit application is submitted for approval.

Separate water service will be provided to the Project Area and will be separately metered from the existing BWS services.

Scenario 1, Assisted Living—Proposed Program Information

Facility	Area	Avg. Daily Water Demand (gpd)
Assisted Living Facility	266 beds	29,260
BWS New Office Building	36,000 sf	2,480
	Total:	**31,740 gpd**

Scenario 2, Senior Rental Housing—Proposed Program Information

Facility	Area	Avg. Daily Water Demand (gpd)
Senior Rentals	312 units	93,600
BWS New Office Building	36,000 sf	2,480
	Total	**96,080 gpd**

Scenario 3, Parking Structure—Proposed Program Information

Facility	Area	Avg. Daily Water Demand (gpd)
BWS New Office Building	36,000 sf	2,480
	Total	**2,480 gpd**

Proposed Improvements

On-site water system improvements will be required to accommodate the proposed redevelopment consisting of new water meters, backflow preventers, valves and underground piping. Proposed connection to the BWS system will be to the existing 8-inch water line located within Lauhala Street for the ‘Ewa Block redevelopment and the 8-inch lateral mauka of the Engineering Building for the Diamond Head Block redevelopment. The PER appendix shows the proposed improvements for each of the three development scenarios.

The water line sizes, meter, and backflow locations will be determined during the design phase of the project and based on the final redevelopment scenario. Proposed connections and improvements will be confirmed when construction drawings for the proposed redevelopment scenario are developed and submitted to BWS for review and approval. Trenching and backfilling of proposed water lines will follow BWS standards and the soils engineer’s recommendations.

New on-site fire hydrants and fire access roads will be provided as required to ensure adequate fire protection for the proposed buildings.

4.9.3 WASTEWATER

4.9.3.1 EXISTING CONDITIONS

A *Preliminary Engineering Report (PER), Civil Infrastructure* (Appendix H) was prepared by Wilson Okamoto Corporation. Figure 4-13 shows the existing sanitary sewer system for the Beretania Complex. The sewer system is part of the Ala Moana collection system, which is operated and maintained by the City Department of Environmental Services (ENV). Record drawings indicate that there are existing 6-inch sewer laterals within Lisbon Street and Lauhala Street. There are also several abandoned sewer laterals stubbed out to the parking lot areas along Lauhala and Lisbon Streets, which formerly served single family residences.

The Lauhala and Lisbon Street sewer mains connect to the 8-inch South Beretania Street sewer main, which then runs between the Frank F. Fasi Municipal Building and Honolulu Hale, to South King Street. The sewer main continues through Kakaʻako, discharging to the Ala Moana Wastewater Pump Station, and then to the Sand Island Wastewater Treatment Plant for treatment and disposal.

The area sewers flow in two directions around the Frank F. Fasi Municipal Building, ultimately converging at the intersection of South King Street, South Street, and Kapiʻolani Boulevard. The Alapaʻi Street sewer main continues makai through South Beretania Street to South King Street.

4.9.3.2 POTENTIAL IMPACTS AND MITIGATION

Connection to the City Sewer System

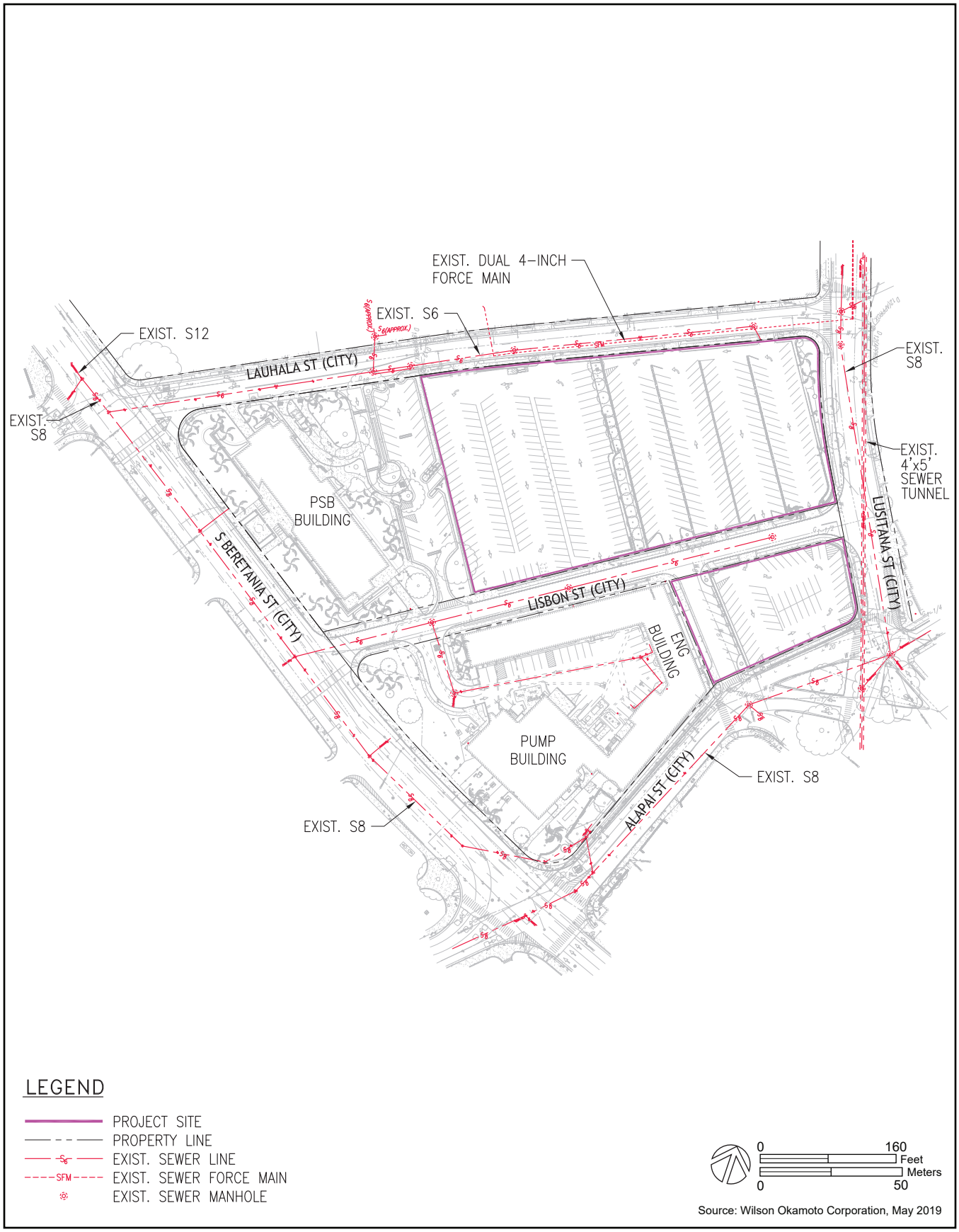
The Department of Planning and Permitting's (DPP) Wastewater Branch (WWB) reviews and authorizes sewer connection applications for developments requiring sanitary sewer service. On February 1, 2019, a preliminary sewer connection application based on the various redevelopment scenarios was approved by WWB, indicating that the existing City sewer system is adequate to support these scenarios.

The expiration date of the approved application is January 30, 2021. Construction plans shall be completed and approved within this 2-year period. Construction shall commence within 1-year after approval of plans. The application can be renewed by submitting a revised sewer connection application; however, its approval is not guaranteed.

Proposed Improvements

The proposed on-site sewer improvements will be determined in the design phase and will consist of new sewer manholes, cleanouts, and underground piping to provide lateral connections to the new buildings. Proposed sewer connections for both the ʻEwa and Diamond Head Blocks will be to the existing 6-inch sewer lateral within Lisbon Street. The PER includes figures showing likely proposed improvements for the three potential redevelopment scenarios.

New sewer lateral locations and sizes will be verified during the project's design phase. Trenching and backfilling of proposed sewer lines will follow City standards and the soils engineer's recommendations. Upon City approvals of the sewer connection application and construction plans, along with payment of the sewer facilities charges, the proposed system can be connected to the City sewer system.



Existing Sewer System **Figure 4-13**

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4.9.4 NATURAL GAS

4.9.4.1 EXISTING CONDITIONS

Synthetic natural gas service is provided by Hawaiʻi Gas. Record drawings obtained through email correspondence with Hawaiʻi Gas indicate that the Beretania Complex is not served by HG. However, 2-inch and 1-inch gas lines are located on Lauhala and Lisbon Streets, respectively.

4.9.4.2 POTENTIAL IMPACTS AND MITIGATION

If the proposed redevelopment requires gas service, further coordination with HG will be required during the design phase to confirm fuel system service connections. The proposed natural gas demand load required by the project will be provided to HG at that time.

4.9.5 DRAINAGE

4.9.5.1 EXISTING CONDITIONS

Runoff generated within the ʻEwa Block of the Project Area sheet flows across the paved parking lots to an opening in the concrete rock masonry (CRM) wall at the southwest corner of the parking lot. Here, runoff is discharged to an existing catch basin on Lauhala Street, where there is an 18-inch drain line.

Runoff generated within the Diamond Head Block sheet flows across the paved parking lot to a drain inlet located in the southwest corner of the parking lot, which discharges via a sidewalk culvert to Lisbon Street. Runoff from Lisbon Street sheet flows to the South Beretania Street drainage system. There is also a catch basin on Alapaʻi Street near the southeast corner of the Diamond Head Block, but it does not receive runoff from the Beretania Complex. The adjacent underground roadway storm drainage systems are owned and maintained by the City and consist of a network of drain lines, catch basins, and drain manholes.

4.9.5.2 POTENTIAL IMPACTS AND MITIGATION

Project Requirements

Drainage run off rates and required improvements for the proposed redevelopment will be based on DPP Storm Drainage Standards, dated August 2017. Any increase in runoff due to the proposed improvements will need to be retained on-site to ensure that the project will not have any adverse effects on downstream properties.

In addition, the proposed drainage improvements will be required to comply with the City's Rules Relating to Water Quality, amended September 2018. Under these rules, projects that disturb over one (1) acre of land are classified as Priority "A" projects. The Project Area would be subject to these rules.

Priority "A" projects are required to:

- Incorporate appropriate Low Impact Development (LID) site design strategies to the "maximum extent practicable" (MEP).
- Incorporate appropriate Source Control Best Management Practices (BMPs) to the MEP.

- Retain on-site by infiltration, evapotranspiration, or harvest/reuse as much of the water quality volume (WQV) as feasible with appropriate LID Retention Post-Construction Treatment Control BMP's.
- Biofilter any portion of the WQV that is not retained on-site with appropriate LID Biofiltration Post-Construction Treatment Control BMPs.

If it is determined to be infeasible to retain and/or biofilter the WQV, the City requires the project to:

- Treat (by detention, filtration, settling, or vortex separation) and discharge with appropriate Alternative Compliance Post-Construction Treatment Control BMPs, any portion of the WQV that is not retained on-site or biofiltered.
- Retain or biofilter, at an offsite location, the volume of runoff from a non-tributary drainage area equivalent to the difference between the project's WQV and the amount retained on-site or biofiltered.

Appropriate BMP measures include infiltration basins and trenches, subsurface infiltration systems, dry wells, bioretention basins, permeable pavement, green roofs, vegetated bio-filters, enhanced swales, detention basins, sand filters, vegetated swales and buffer strips.

The Project Area is currently fully developed with impervious surfaces (i.e., paved parking). Therefore, it is anticipated that any increase in the storm water runoff peak discharge rate will be minimal compared to existing conditions. Any project-related increase in flow to the City system must be retained, reused, or disposed of by percolation on site.

The onsite drainage system will consist of underground piping, manholes, and drain inlets and would maintain the existing discharge points to Lauhala and Lisbon Streets for the 'Ewa and Diamond Head Blocks respectively. As required by City standards, storm water quality measures shall be installed to treat the water quality volume. The PER (Appendix H) shows the proposed improvements for each of the three redevelopment scenarios.

4.9.6 SOLID WASTE

4.9.6.1 EXISTING CONDITIONS

Municipal solid waste collection and disposal on O'ahu is provided by the City Department of Environmental Services (ENV) and private contractors. Services include curbside collection, provision of drop-off facilities, and various programs for recycling assistance. Residential curbside collection includes general refuse, bulky items, and recyclable material collection. Refuse produced by non-household sources, including businesses and condominiums, is collected by private contractors, many of which also offer recycling collection services.

In addition to their collection services, the City provides nine public refuse drop-off locations (six convenience centers and three transfer stations) around the island for residents to dispose of household rubbish. Refuse must be separated into three types: burnable refuse, which is disposed of at the City's H-POWER plant; yard waste (green waste) which is delivered to mulching and composting sites; and large appliances, tires and auto batteries, which are collected separately and recycled where possible.

The City H-POWER waste-to-energy plant in Campbell Industrial Park processes over 700,000 tons of waste annually, producing up to 10% of Oʻahu's electricity. All collected residential waste is taken to H-POWER, which accommodates most residential and general commercial trash.

Construction and Demolition Debris Disposal

Noncombustible construction and demolition (C&D) debris and industry wastes go directly to landfill. The PVT Integrated Solid Waste Management Facility in Nānākuli is Oʻahu's only C&D landfill accepting debris from construction projects, storms, and other sources. The facility also accepts asbestos containing materials; petroleum-contaminated soil from known sources; liquids and sludge (for solidification) from known sources; and other items such as concrete (clean, lead painted, mixed loads), screened dirt and carpets. The facility recycles wood; feedstock; metals; and concrete, rock, and dirt.

It is estimated that the existing PVT landfill has a remaining lifespan of ten years (Kubota, 2019). PVT Land Company has started closure activities for part of the landfill and is proposing to eventually relocate its landfill and recycling operation to a nearby parcel.

Recycling

Recycling rates on Oʻahu are above the national average, and Honolulu ranks among the top cites in the country in landfill diversions. With the combined use of the H-POWER plant and its robust recycling program, the City is able to divert more than 70% of its municipal solid waste from landfill disposal.

City agencies such as BWS are encouraged to recycle office paper, cardboard, newspaper, aluminum and plastic. ENV manages central contracts for office paper, green waste and tires for City agencies. Other items such as e-waste, metals, auto batteries, rechargeable batteries, and motor oil are disposed of by separate contractor. Any mandatory recycling requirements that the City imposes on the commercial sector, it also imposes on itself. Current disposal restrictions on cardboard and green waste apply to commercial and government facilities. All yard trimmings and grass from City parks and grounds are mulched or composted.

The City buys only recycled-content paper to support the recycled paper market, which includes everything from toilet tissue and paper towels to copier and computer paper. It continues to explore other types of products made from recycled material—such as recycled plastic lumber—which could be used in place of products currently being purchased.

4.9.6.2 POTENTIAL IMPACTS AND MITIGATION

Construction Period

Redevelopment of the Beretania Complex will generate demolition and construction debris, including the asphalt that covers most of the Project Area. Other demolition debris may include steel and stainless steel pipes and fencing, wood products, earth, fill, rock, and other materials. Prior to the 1980s, asphalt paving sometimes included the addition of asbestos because it was fireproof, water resistant, easy to work with and inexpensive. It is unknown whether there is any asbestos containing material in the asphalt, or other materials of concern such as lead based paint, or petroleum-contaminated soil. A solid waste management plan, to include testing for materials regulated by the U.S. Environmental Protection Agency under the Resource Conservation and Recovery Act (RCRA) will need to be developed. If asbestos containing materials, lead based paint

or other regulated materials are found, demolition must proceed in accordance with State and federal methods and procedures, including utilizing appropriately trained personnel for removal, and air monitoring and analysis during removal operations to ensure that air quality regulations are met. Hazardous materials shall be handled, stored, transported and disposed in accordance with all applicable regulations.

Recycling of non-hazardous materials will be encouraged to minimize landfill waste. Non-hazardous construction debris that cannot be recycled will be hauled to PVT's Integrated Solid Waste Management Facility for disposal.

Operational Period

Future (non-governmental) uses at the Project Area such as assisted living or senior rental apartments will contract with commercial companies for their solid waste disposal. The City's Recycling Office encourages recycling by condominiums and apartment buildings and provides start up assistance for recycling efforts. Existing BWS offices and the new BWS office building will continue current solid waste collection and disposal services and ongoing recycling efforts.

4.10 Roadways and Transportation

A *Traffic Impact Report* (TIR) has been prepared by Wilson Okamoto Corporation (WOC, May 2019), and is included as Appendix I. The purpose of the TIR was to identify and assess the traffic impacts resulting from the proposed redevelopment of the Project Area.

The TIR evaluated existing roadways and traffic operations in the vicinity and assessed future traffic conditions without and with the proposed redevelopment. The study identified impacts associated with the three redevelopment scenarios, and recommended improvements, if appropriate, to mitigate the resulting traffic impacts.

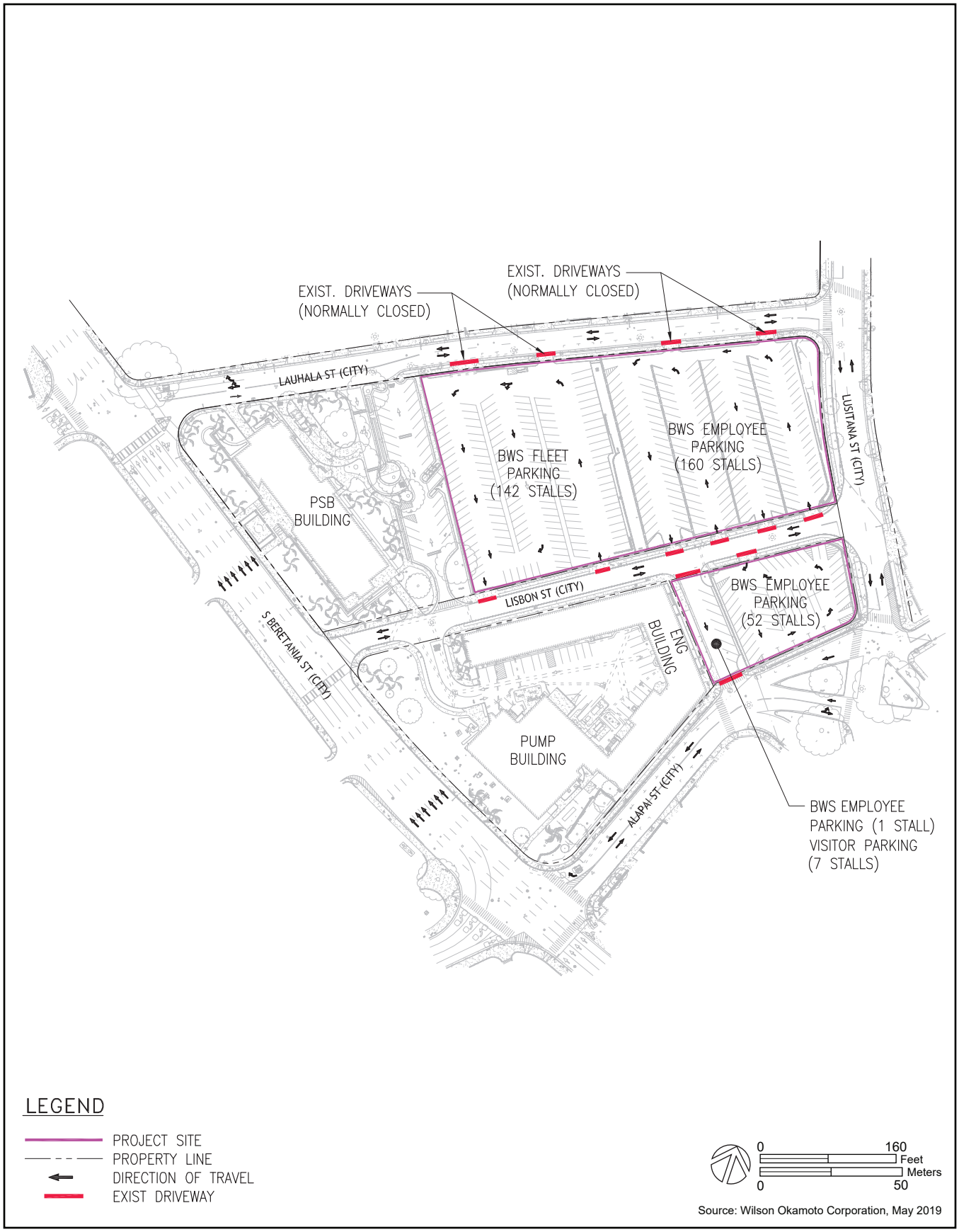
4.10.1 EXISTING CONDITIONS

4.10.1.1 PROJECT DESCRIPTION AND CHARACTERISTICS

The Project Area is bounded by South Beretania Street to the south, Lusitana Street to the north, Alapaʻi Street to the east, and Lauhala Street to the west. The Beretania Complex is comprised of three parcels that include office and maintenance buildings and at-grade parking areas for the agency's employees and fleet vehicles. Existing site access is illustrated in Figure 4-14.

Access to the existing Beretania Complex is currently provided via driveways off Lauhala Street and Lisbon Street. Although there are several driveways located along Lauhala Street, the driveways leading to the adjacent parking lots are gated and not currently used.

The following sections describe each of the redevelopment scenarios, proposed access, on-site circulation, and parking locations. Redevelopment will be limited to areas of the Beretania Complex currently occupied by open parking lots. Access to existing BWS buildings will remain unchanged. For purposes of the TIR, it is assumed that whichever redevelopment scenario is constructed, it will be completed and occupied by Year 2026.



Existing Site Access **Figure 4-14**

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Scenario 1 (Assisted Care Living Facility and Office Building)

Under this scenario (Figure 4-15), a new assisted living care facility that accommodates approximately 266 beds will be constructed in the northwest portion of the Project Area. Parking for the new assisted living care facility will be provided in a new parking structure that will also provide replacement parking for the BWS to offset the parking stalls displaced by this scenario, as well as 218 additional parking stalls for lease. The existing driveways off Lisbon Street that are currently serving the northwest parking areas will be consolidated into a new two-way driveway that will provide access to the new assisted living care facility and parking garage. A secondary driveway is also proposed off Lauhala Street with access restricted to BWS's oversize fleet vehicles only.

The northeast portion of the Project Area will include a new BWS building with approximately 35,500 SF of office uses, as well as a new parking garage for its employees within the new office building. Access to the new office building is expected to be provided via an existing two-way driveway off Lisbon Street.

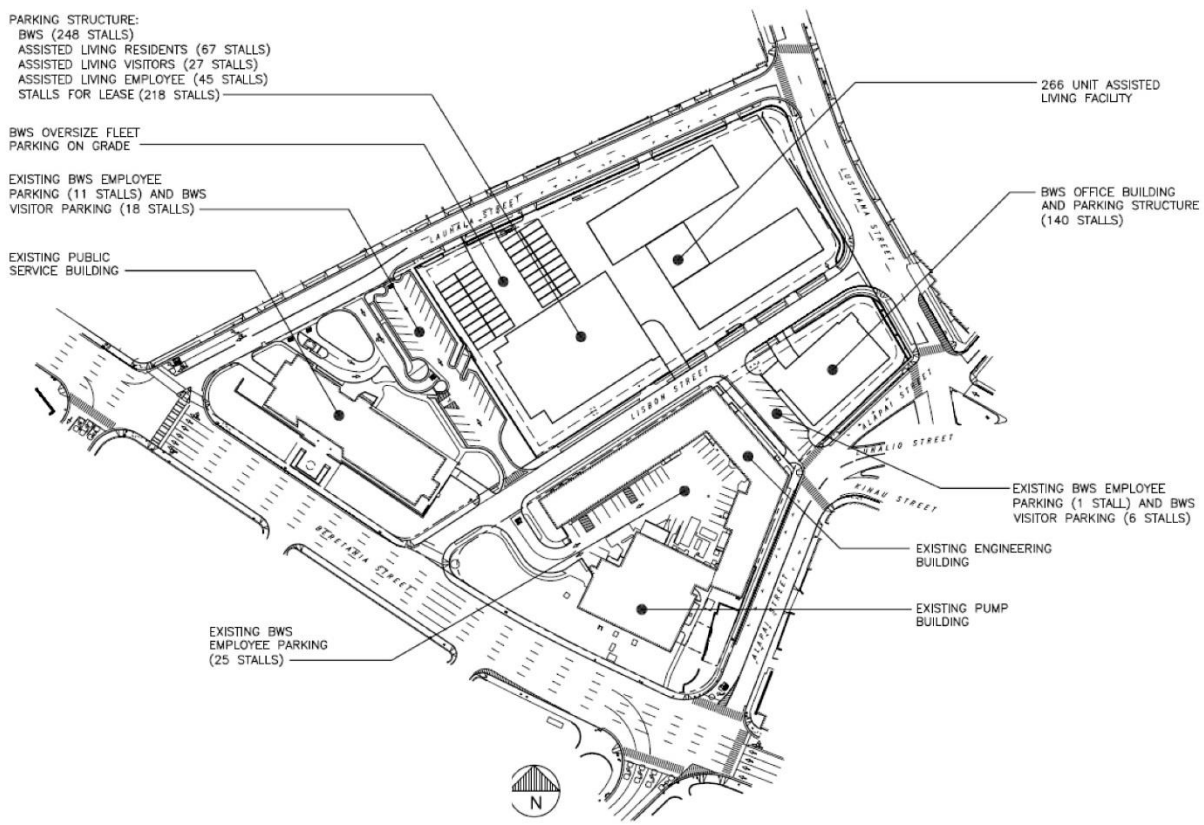


FIGURE 4-15: SCENARIO 1, ASSISTED CARE LIVING FACILITY & OFFICE BUILDING

Scenario 2 (Affordable Senior Rental Apartments and Office Building)

Under Scenario 2 (Figure 4-16), new affordable senior rental apartments with approximately 312 units will be constructed in the northwest corner of the Project Area. Parking will be provided in a new parking structure that will also provide replacement parking for the BWS, and 247 additional parking stalls for lease. The existing driveways off Lisbon Street that are currently serving the northwest parking areas will be consolidated into a new two-way driveway that will provide access to the apartments and parking garage. A secondary driveway is also proposed off Lauhala Street with access restricted to BWS's oversize fleet vehicles only.

As with Scenario 1, the northeast portion of the existing site will include a new BWS office building and parking garage, with access via an existing two-way driveway off Lisbon Street.

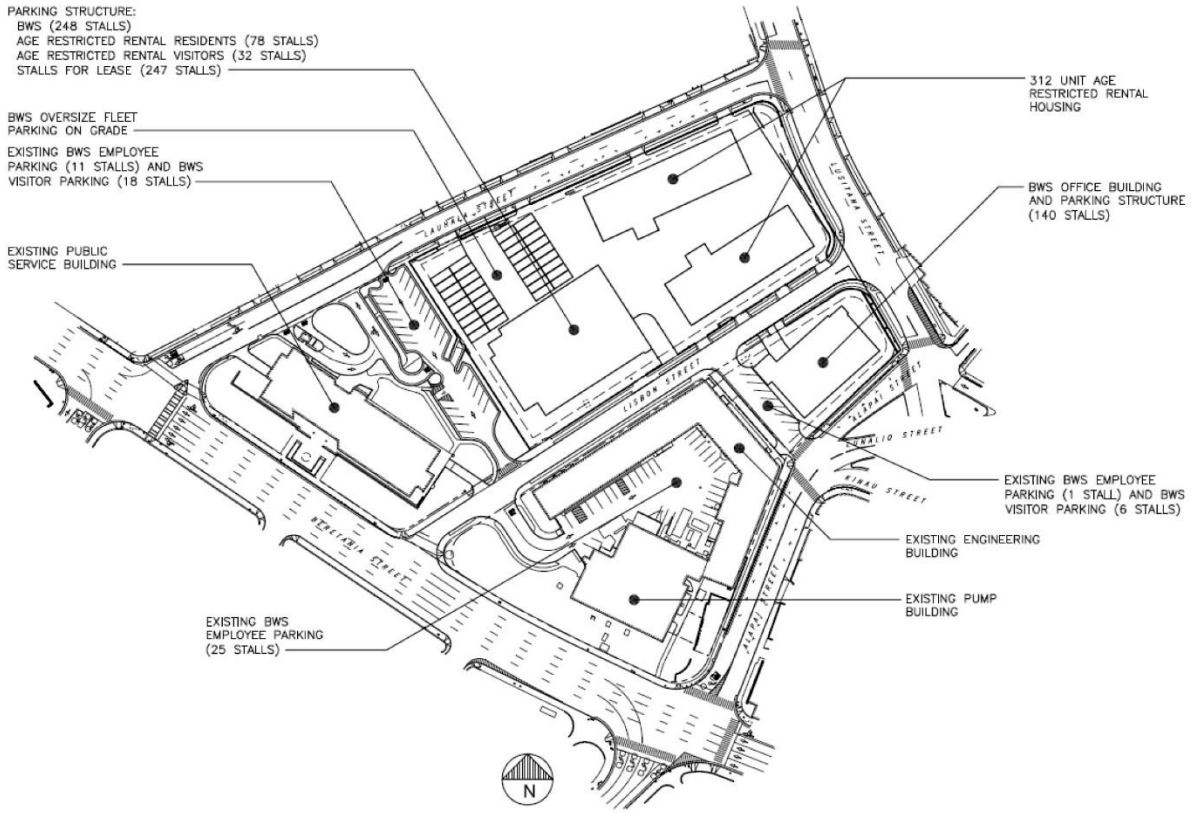


FIGURE 4-16: SCENARIO 2, AFFORDABLE SENIOR RENTAL APARTMENTS & OFFICE BUILDING

Scenario 3 (Parking Structure and Office Building)

Under Scenario 3 (Figure 4-17), a parking structure will be built between Lauhala Street and Lisbon Street, but the far northwest corner of the Project Area will remain as ground level BWS parking. The new parking structure will provide replacement parking for the BWS to offset parking stalls displaced by this scenario, as well as 977 additional parking stalls for lease. The existing driveways off Lisbon Street that are currently serving the northwest parking areas will be consolidated into a new two- way driveway that will provide access to the parking garage. A secondary driveway is also proposed off Lauhala Street with access restricted to BWS's oversize fleet vehicles only.

As with the other scenarios, the northeast portion of the existing site will include a new BWS office building and parking garage, with access via an existing two-way driveway off Lisbon Street.

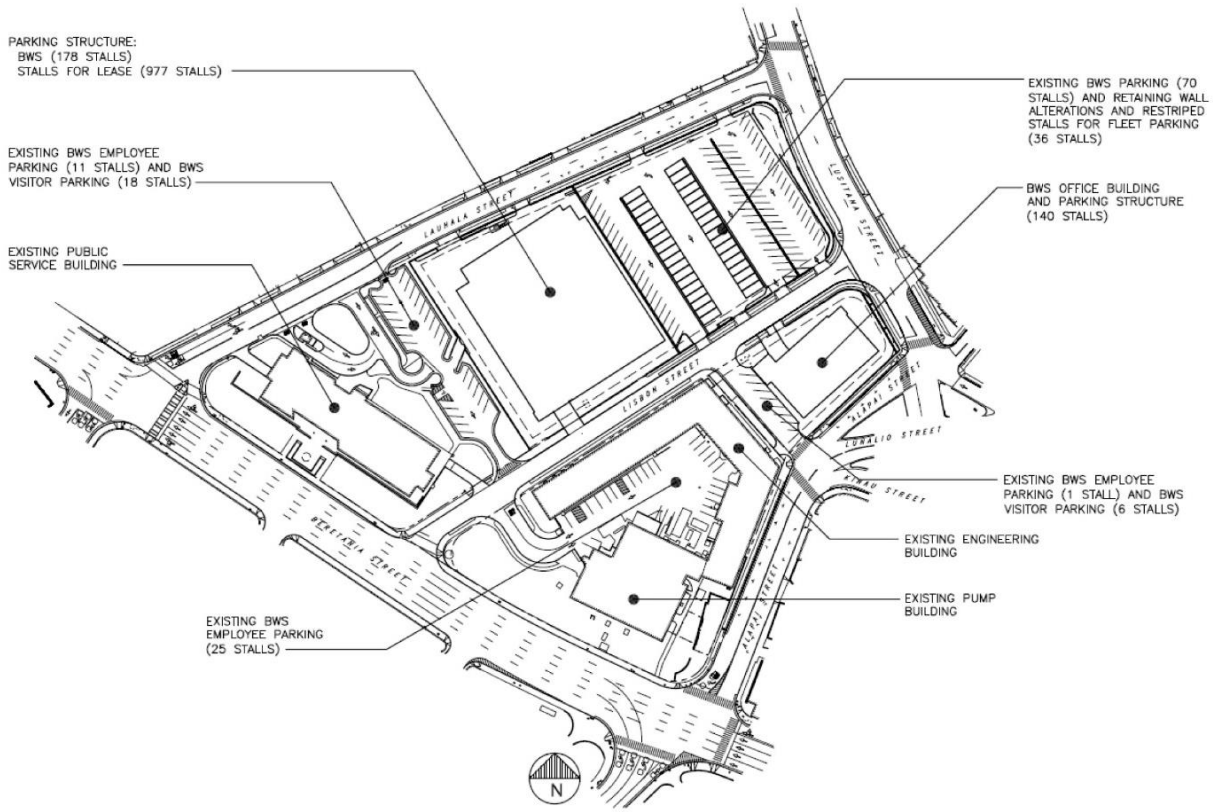


FIGURE 4-17: SCENARIO 3, PARKING STRUCTURE & OFFICE BUILDING

4.10.1.2 AREA ROADWAY SYSTEM

The following are brief discussions of the existing roads in the project vicinity.

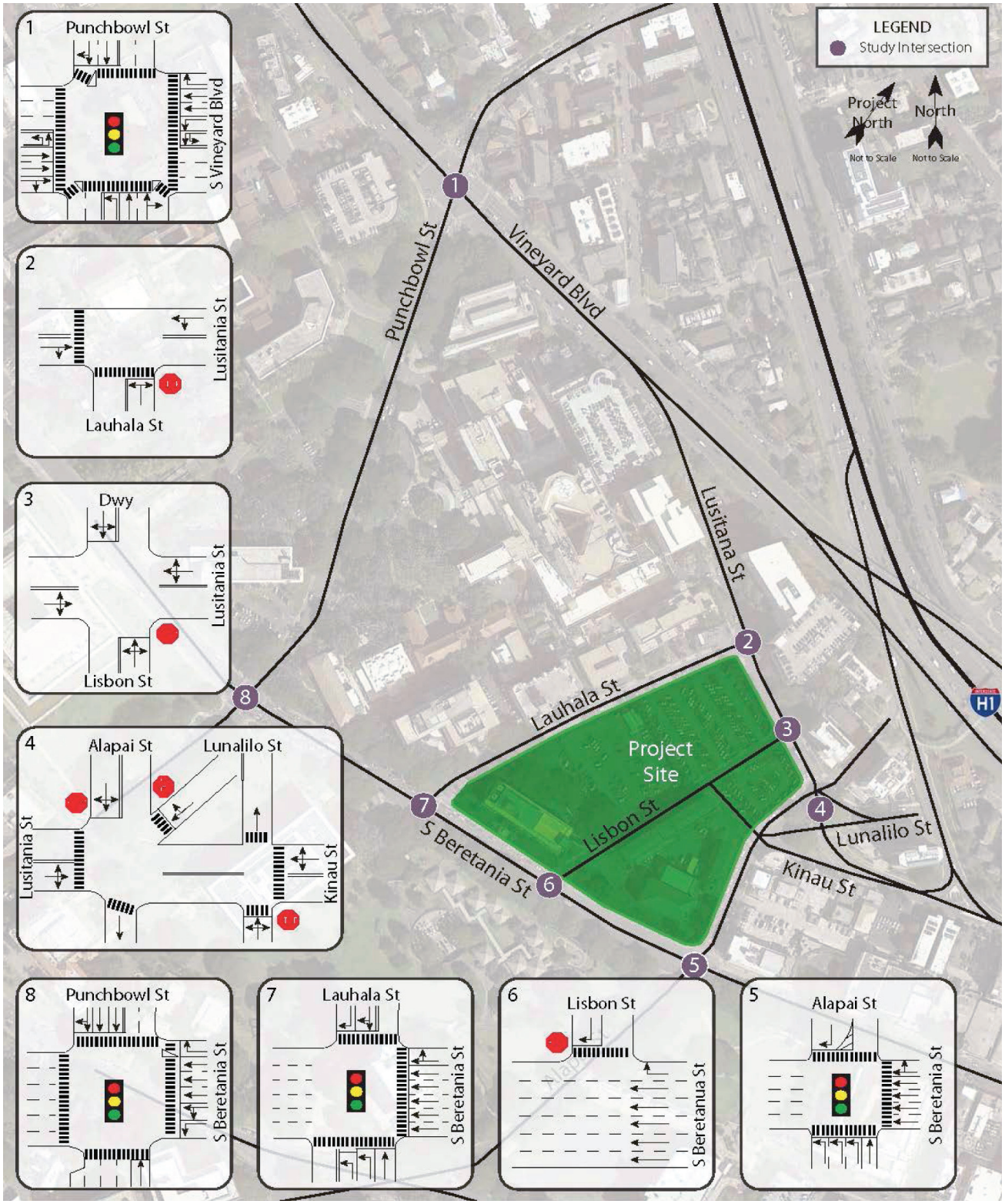
- **Vineyard Boulevard**—Located northwest of the Project Area, Vineyard Boulevard is a predominantly six-lane, two-way divided roadway that runs parallel to the Interstate H-1 Freeway through downtown Honolulu.
- **Lusitana Street**—This street forms the northern boundary of the Project Area, and is a two-lane, two-way roadway generally oriented in the east-west direction. It intersects Lauhala Street and Lisbon Street adjacent to the Project Area.
- **Lauhala Street**—This street forms the Project Area's western boundary, and is a two-lane, two-way roadway generally oriented in the north-south direction. It serves as a connector roadway between Lusitana Street and South Beretania Street.
- **Lisbon Street**—This is a two-lane, two-way roadway generally oriented in the north- south direction that also provides a connection between Lusitana Street and South Beretania Street. Lisbon Street separates the Project Area into its 'Ewa Block and its Diamond Head Block.
- **Alapaʻi Street**—At the east end of the study area, Lusitana Street intersects Alapaʻi Street, which originates at South King Street as a four-lane, one-way (northbound) road, and transitions to a two-lane, two-way road north of South Beretania Street.
- **South Beretania Street**—South Beretania Street forms the southern boundary of the Project Area and is the frontage road for the Beretania Complex. In the project vicinity, this street is a five-lane, one-way (westbound) roadway. Together with South King Street, South Beretania Street forms a couplet that runs parallel to the Interstate H-1 Freeway and Vineyard Boulevard through downtown Honolulu.

4.10.1.3 TRAFFIC VOLUMES AND CONDITIONS

The TIR conducted field investigations in November 2017 and April 2018, consisting of manual turning movement count surveys during the morning peak (5:00 AM to 8:00 AM) and afternoon peak (3:00 PM to 6:00 PM). The following intersections, shown on Figure 4-18, were evaluated:

- Vineyard Boulevard and Punchbowl Street
- Lusitana Street and Lauhala Street
- Lusitana Street and Lisbon Street
- Lusitana Street, Alapaʻi Street, Lunalilo Street, and Kinau Street
- South Beretania Street and Alapaʻi Street
- South Beretania Street and Lisbon Street
- South Beretania Street and Lauhala Street
- South Beretania Street and Punchbowl Street

Traffic counts at these study intersections are included in the appendix of the TIR (Appendix I). The highway capacity analyses performed in the TIR is based upon procedures presented in the "Highway Capacity Manual," Transportation Research Board, 2000, and the "Synchro" software, developed by Trafficware. Because the methodology was unable to accommodate all the exclusive and shared-use lane configurations in the study area, the TIR used the HCM 2000 methodology output.



Existing Lane Configuration

Source: Wilson Okamoto Corporation, May 2019

Area Roadways and Traffic Study Intersections **Figure 4-18**

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The analysis is based on the concept of Level of Service (LOS) to identify the traffic impacts associated with traffic demands during the peak periods of traffic. LOS is a quantitative and qualitative assessment of traffic operations. Levels of Service are defined by LOS "A" through "F"; LOS "A" representing ideal or free-flow traffic operating conditions and LOS "F" unacceptable or potentially congested traffic operating conditions.

"Volume-to-Capacity" (v/c) ratio is another measure indicating the relative traffic demand to the road carrying capacity. A v/c ratio of one (1.00) indicates that the roadway is operating at or near capacity. A v/c ratio of greater than 1.00 indicates that the traffic demand exceeds the road's carrying capacity.

The existing traffic volumes showed that the AM peak hour of traffic generally occurs between 7:00 AM and 8:00 AM, while the PM peak hour of traffic generally occurs between 4:15 PM and 5:15 PM. The analysis is based on these peak hour time periods for each study intersection. The AM and PM peak hour counts for each intersection are shown in Figure 4-19.

Existing Peak Hour Traffic

① **Vineyard Boulevard and Punchbowl Street**. At this intersection, Vineyard Boulevard carries 1,718 vehicles eastbound and 1,434 vehicles westbound during the AM peak period. During the PM peak period, the overall traffic volume is less with 1,944 vehicles traveling eastbound and 791 vehicles traveling westbound. The eastbound approach operates at LOS "D" during both peak periods, while the westbound approach operates at LOS "D" and LOS "E" during the AM and PM peak periods, respectively.

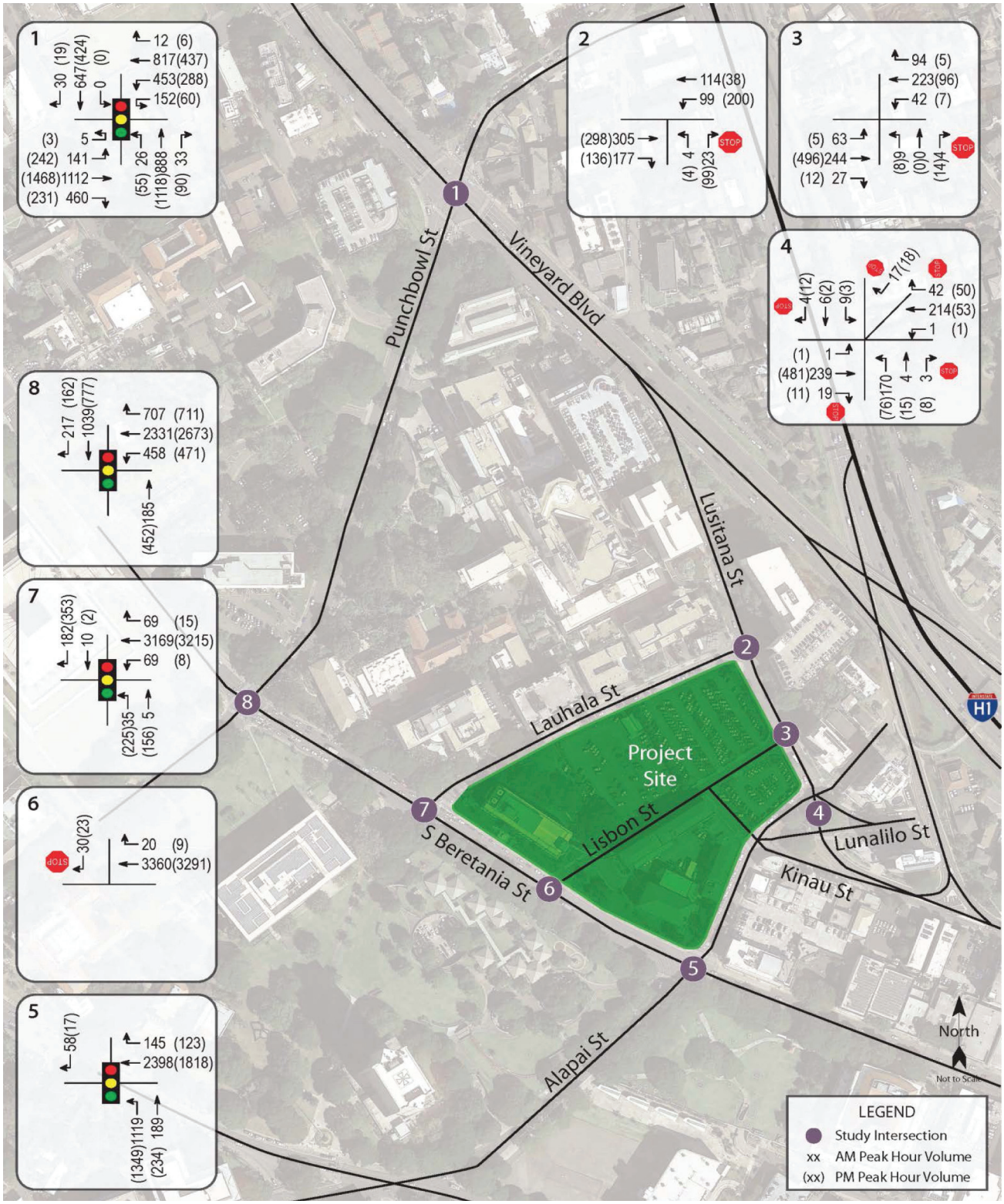
The Punchbowl Street approach of the intersection carries 947 vehicles northbound and 677 vehicles southbound during the AM peak period. During the PM peak period, the overall traffic volume increased with 1,263 vehicles traveling northbound and 443 vehicles traveling southbound. The northbound approach operates at LOS "E" during both peak periods while the southbound approach operates at LOS "D" during both periods.

Crosswalks are provided across Vineyard Boulevard on the east and west sides of the intersection, as well as across Punchbowl Street on the north and south sides of the intersection. Pedestrian counts are included in the TIR.

② **Lusitana Street and Lauhala Street**. At this intersection, Lusitana Street carries 482 vehicles eastbound and 213 vehicles westbound during the AM peak period. During the PM peak period traffic volumes remained approximately the same with 434 vehicles traveling eastbound and 238 vehicles traveling westbound. The westbound left-turn traffic movement operates at LOS "A" during both peak periods.

The Lauhala Street approach of the intersection carries 27 vehicles and 103 vehicles northbound during the AM and PM peak periods, respectively. The northbound approach of Lauhala Street operates at LOS "B" during both peak periods.

Crosswalks are provided across Lusitana Street on the west side of the intersection and across Lauhala Street on the south side of the intersection. Pedestrian counts are provided in the TIR.



Existing Peak Hours of Traffic

Source: Wilson Okamoto Corporation, May 2019

Peak Hour Traffic Volumes **Figure 4-19**

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③ **Lusitana Street and Lisbon Street**. At this intersection, Lusitana Street carries 334 vehicles eastbound and 359 vehicles westbound during the AM peak period. During the PM peak period, the overall traffic volume was approximately the same with 513 vehicles traveling eastbound and 108 vehicles traveling westbound. The left-turn traffic movements at both approaches of Lusitana Street operate at LOS "A" during both peak periods.

The Lisbon Street approach of the intersection carries 13 vehicles and 22 vehicles northbound during the AM and PM peak periods, respectively. The northbound approach on Lisbon Street operates at LOS "C" and LOS "B" during the AM and PM peak periods, respectively.

Although there are no marked crosswalks at this intersection, pedestrians were observed crossing Lisbon Street, and the counts are included in the TIR.

④ **Lusitana Street, Alapaʻi Street, Lunalilo Street, and Kinau Street**. At the intersection with Alapaʻi Street, Lunalilo Street and Kinau Street, the Lusitana Street approach carries 258 vehicles and 494 vehicles eastbound during the AM and PM peak periods respectively. The Kinau Street approach carries 216 vehicles and 58 vehicles westbound during the AM and PM peak periods, respectively. The Alapaʻi Street approach carries 19 vehicles and 9 vehicles southbound during the AM and PM peak periods, respectively, while the Lunalilo Street approaches carry 177 vehicles northbound and 17 vehicles southbound during the AM peak period, and 99 vehicles northbound and 18 vehicles southbound during the PM peak period. The northbound approach from Lunalilo Street operates at a LOS "C" during both peak periods while the southbound approach of that roadway operates at LOS "A" during both peak periods. The southbound approach of Alapaʻi Street operates at LOS "C" and LOS "B" during the AM and PM peak periods, respectively.

Crosswalks are provided across Lusitana Street, Kinau Street, and Lunalilo Street approaches of the intersection, as well as Alapaʻi Street on the south side of the intersection.

⑤ **South Beretania Street and Alapaʻi Street**. South Beretania Street carries 2,441 vehicles and 1,941 vehicles westbound during the AM and PM peak periods, respectively. This approach operates at LOS "B" during both peak periods. The Alapaʻi Street approach carries 1,260 vehicles northbound and 56 vehicles southbound during the AM peak period. During the PM peak period, the overall traffic volume is higher with 1,583 vehicles traveling northbound and 17 vehicles traveling southbound. The northbound approach on Alapaʻi Street operates at LOS "C" during both peak periods while the southbound approach operates at LOS "C" and LOS "B" during the AM and PM peak periods, respectively. Vehicular queues periodically formed on the approaches of the intersection with the most significant queuing occurring along South Beretania Street during the PM peak period. During this peak period, westbound queues, primarily in the two lanes on the north side of the roadway, extended from the downstream intersection with Punchbowl Street through this intersection and the upstream intersection with Hale Makai Street.

Crosswalks are provided across South Beretania Street on the east side of the intersection, as well as across Alapaʻi Street on the north and south sides of the intersection.

⑥ **South Beretania Street and Lisbon Street.** At the intersection with Lisbon Street, South Beretania Street carries 3,380 vehicles and 3,300 vehicles westbound during the AM and PM peak periods, respectively. The Lisbon Street approach carries 30 vehicles and 23 vehicles southbound during the AM and PM peak periods, respectively. The southbound approach of Lisbon Street operates at a LOS "B" during the AM and PM peak periods. As previously noted, queues formed along South Beretania Street during the PM peak period with westbound queues from the

downstream intersection with Punchbowl Street extending through this intersection during that period.

A crosswalk is provided across the Lisbon Street approach of the intersection.

⑦ **South Beretania Street and Lauhala Street**. At the intersection with Lauhala Street, South Beretania Street carries 3,307 vehicles and 3,238 vehicles westbound during the AM and PM peak periods, respectively. This approach operates at LOS "A" during both peak periods. The southbound approach of Lauhala Street carries 192 vehicles and 355 vehicles during the AM and PM peak periods, respectively. The southbound approach on Lauhala Street operates at LOS "D" during both peak periods. The northbound approach is comprised of the driveway that serves the adjacent Kalanimoku Building. This approach carries 40 vehicles and 381 vehicles northbound during the AM and PM peak periods, respectively. As previously noted, queues formed along South Beretania Street during the PM peak period with westbound queues from the downstream intersection with Punchbowl Street extending through this intersection during that period.

Crosswalks are provided across South Beretania Street on the east side of the intersection, as well as across Lauhala Street on the north side, and the driveway approach on the south side of the intersection.

⑧ **South Beretania Street and Punchbowl Street**. At the intersection with Punchbowl Street, South Beretania Street carries 3,496 vehicles and 3,911 vehicles westbound during the AM and PM peak periods, respectively. This approach operates at LOS "B" during the AM and PM peak periods. The Punchbowl Street approaches carry 185 vehicles northbound and 1,256 vehicles southbound during the AM peak period. During the PM peak period, the overall traffic volume is slightly less with 460 vehicles traveling northbound and 939 vehicles traveling southbound. The northbound approach operates at LOS "C" and LOS "D" during the AM and PM peak periods, respectively, while the southbound approach operates at LOS "C" during both peak periods. Vehicular traffic queues periodically formed on the approaches of the intersection with the most significant queuing occurring on the South Beretania Street approach of the intersection during the PM peak period. During this period, westbound queues extended through the upstream intersections with Lauhala Street, Lisbon Street, and Alapaʻi Street. In addition, vehicular queues along Punchbowl Street from the intersection with Vineyard Boulevard occasionally extended to this intersection.

Crosswalks are provided across South Beretania Street on the east and west sides of the intersection, as well as across Punchbowl Street on the north and south sides of the intersection.

4.10.1.4 OTHER MODES OF TRAVEL

Pedestrian Facilities

Pedestrian circulation in the vicinity of the Beretania Complex is currently facilitated by improved facilities along the adjacent roadways including sidewalks and marked crosswalks. On the south side of the project site, South Beretania Street includes sidewalks and street lighting with crosswalks and curb ramps provided at the intersections with Alapaʻi Street, Lisbon Street, Lauhala Street, and Punchbowl Street and pedestrian crossing facilitated at the Alapaʻi Street, Lauhala Street, and Punchbowl Street intersections through pedestrian phasing at those signalized intersections. On the north, east, and west sides of the Project Area, Lusitana Street, Lauhala Street, and Alapaʻi Street, have sidewalks and street lighting with trees along Lusitana Street providing intermittent shade on the north side of the roadway.

Bicycle Facilities

Bicycle facilities generally consist of shared-use paths, bicycle lanes, or shared roadways with pavement markings called sharrows. In the vicinity of the Beretania Complex, bike lanes are provided along Lusitana Street, Alapaʻi Street, and South Beretania Street. To the west, connection to Hotel Street, which has been designated for transit and bicycles, is provided via paths through the adjacent State Capitol grounds.

South of the Project Area, South King Street has a cycle track or two-way protected bike lane. In addition, there are three Biki bikeshare stations located within a block of the Project Area, including stations located midblock along Lauhala Street, near the intersection of South Beretania Street and Lauhala Street, and the intersection of Punchbowl Street and South Beretania Street.

Transit Facilities

Public transit facilities are provided in the vicinity of the Beretania Complex along South Beretania Street, Punchbowl Street, South King Street, and Alapaʻi Street. Bus stops servicing westbound routes are located within a block along South Beretania Street and Punchbowl Street with stops servicing eastbound routes located along South King Street approximately two blocks away. Two of the closest bus stops along South Beretania Street are located west of the intersection with Punchbowl Street and east of the intersection with Alapaʻi Street. The bus stop near Punchbowl Street is served by approximately 40 routes while the bus stop near Alapaʻi Street is served by four routes.

In addition, the Alapaʻi Transit Center is also located on Alapaʻi Street, in close proximity to the Project Area. The transit center is served by approximately 31 bus routes. It should also be noted that the City is currently developing a fixed guideway transit system that will extend from Kapolei to the central Honolulu area, providing an alternate mode of travel. The transit guideway alignment is expected to run along Halekauwila Street with the Civic Center Station approximately a half mile south of the Project Area.

4.10.2 POTENTIAL IMPACTS AND MITIGATION

The TIR evaluated future traffic conditions without the project and with the project.

4.10.2.1 PROJECTED TRAFFIC CONDITIONS WITHOUT PROJECT

The travel forecast is based on historical traffic count data obtained from the HDOT, Highways Division at survey stations along South Beretania Street, Punchbowl Street, and Vineyard Boulevard in the Project Area vicinity. Historical data indicates relatively stable traffic volumes along the study corridors and an annual traffic growth rate of approximately 1.0% was conservatively assumed. Using 2017 as the Base Year, a growth rate factor of 1.09 was applied to the existing traffic demands along South Beretania Street, Punchbowl Street, and Vineyard Boulevard to achieve the projected Year 2026 traffic demands.

As shown in Table 4-10, under Year 2026 without project conditions, traffic operations during the AM peak period are expected to deteriorate slightly from existing conditions due to ambient growth in traffic. Along Punchbowl Street, traffic operations at the intersection with South Beretania Street are expected to deteriorate from LOS "C" or better to LOS "D" or better during the AM peak period while those at the intersection with Vineyard Boulevard are expected to deteriorate from LOS "E" or better to LOS "F" or better during the same peak period.

The low levels of service at the intersection of Vineyard Boulevard and Punchbowl Street are influenced by the high volume of conflicting traffic movements at this intersection. Along Lusitana Street, traffic operations at the intersections with Lisbon Street and Alapaʻi Street, Lunalilo Street, and Kinau Street are expected to continue operating at LOS "C" or better during both peak periods, while those at the intersection with Lauhala Street are expected to continue operating at LOS "B" or better during both peak periods. Traffic operations at the remaining intersections along South Beretania Street are also expected to remain similar to without project conditions.

TABLE 4-10: EXISTING AND PROJECTED YEAR 2026 (WITHOUT PROJECT) LOS TRAFFIC OPERATING CONDITIONS

Intersection	**Approach/ Critical Movement**	**AM**		**PM**	
		Existing	**Year 2026 w/out Project**	**Existing**	**Year 2026 w/out Project**
Vineyard Blvd/ Punchbowl St	Eastbound	D	E	D	E
	Westbound	D	E	E	E
	Northbound	E	F	E	E
	Southbound	D	D	D	D
Lusitana St/ Lauhala St	Westbound (LT*)	A	A	A	A
	Northbound	B	B	B	B
Lusitana St/ Lisbon St	Westbound (LT*)	A	A	A	A
	Northbound	C	C	B	B
Lusitana St/ Alapaʻi St/ Lunalilo St/ Kinau St	Eastbound (LT*)	A	A	A	A
	Westbound (LT*)	A	A	A	A
	Northbound	C	C	C	C
	Southbound	B	B	B	B
South Beretania St/ Alapaʻi St	Westbound	B	B	B	B
	Northbound	C	C	C	C
	Southbound	B	B	B	B
South Beretania St/ Lisbon	Southbound	B	B	B	B
South Beretania St/ Lauhala St	Westbound	A	A	A	A
	Southbound	D	D	D	D
South Beretania St/ Punchbowl St	Westbound	B	C	B	B
	Northbound	C	C	D	D
	Southbound	C	D	C	C

*LT = Left-Turn Source: Wilson Okamoto Corporation, 2019

4.10.2.2 PROJECTED TRAFFIC CONDITIONS WITH PROJECT

The TIR estimated trips generated by the three redevelopment scenarios, using a methodology and techniques developed by the Institute of Transportation Engineers (ITE) and published in "Trip Generation, 10th Edition," 2017. The trip generation rates correlate the vehicle trip generation data with various land use characteristics such as the number of vehicle trips generated per square foot of development, per number of beds, or per number of residential units.

All three redevelopment scenarios include parking garages. Typically, parking garages are not directly linked to the generation of new trips; rather, trip generation is related to the associated land uses. However, since the proposed parking garage will include parking stalls to be leased to surrounding existing land uses, a direct correlation cannot be drawn between those land uses and the generation of new trips in the vicinity. Therefore, the TIR determined trips associated with these parking stalls using the procedures developed by ITE and published in "Parking Generation, 4th Edition," 2010. Similar to the trip generation rates, the ITE parking generation rates are developed by correlating parking demand ratios over the course of a typical day with various land uses and building types. Using parking distribution ratios over the course of a typical day for land uses similar to those in the surrounding area, trip generation characteristics for the AM and PM peak periods were determined using the number of available parking stalls as the independent variable.

The TIR includes a series of tables summarizing the trip generation characteristics for the three redevelopment scenarios, as well as figures showing the distribution of site-generated traffic.

Year 2026 with Scenario 1 (Assisted Care Living and Office Building)

The Year 2026 cumulative AM and PM peak hour traffic conditions with the implementation of Scenario 1 (Assisted Care Living Facility and Office Building) are summarized in Table 4-11. The cumulative volumes consist of site-generated traffic superimposed over the Year 2026 projected traffic demands. The projected Year 2026 (Without Redevelopment Project) operating conditions are provided for comparison purposes.

Traffic operations under Scenario 1 are generally expected to remain similar to conditions where no redevelopment occurs. The trips generated by the project under all scenarios were distributed based on the available routes and the existing distribution of vehicles at the study intersections. As a result, the majority of the site-generated trips were assumed to utilize South Beretania Street. Although there were increases in the number of trips along the project roadways, i.e., Lisbon, Lauhala, and Lusitana Streets, those increases were not high enough to degrade the LOS from existing conditions, as the level of service represents a range based upon a number of factors.

As shown in the table, along South Beretania Street, traffic operations at the intersections with Punchbowl Street and Lauhala Street are expected to continue operating at LOS "D" or better during both peak periods while those at the intersection with Alapaʻi Street are anticipated to continue operating at LOS "C" or better during both peak periods. At the intersection with Lisbon Street, the traffic operations are expected to continue operating at LOS "B" or better during both peak periods. Along Lusitana Street, the approaches at the intersections with Lauhala Street are expected to continue operating at LOS "B" or better during both peak periods while those at the intersection with Lisbon Street and Alapaʻi Street, Lunalilo Street, and Kinau Street are expected to continue operating at LOS "C" or better during the AM peak period and LOS "B" or better during the

PM peak period. The remaining study intersection along Punchbowl Street is also anticipated to continue operating similar to without project conditions.

TABLE 4-11: PROJECTED YEAR 2026 (WITHOUT AND WITH SCENARIO 1)
LOS TRAFFIC OPERATING CONDITIONS

Intersection	**Approach/ Critical Movement**	**AM**		**PM**	
		Year 2026		**Year 2026**	
		w/o Proj	**Scenario 1**	**w/o Proj**	**Scenario 1**
Vineyard Blvd/ Punchbowl St	Eastbound	E	E	E	E
	Westbound	E	E	E	E
	Northbound	F	F	E	E
	Southbound	D	D	D	D
Lusitana St/ Lauhala St	Westbound (LT*)	A	A	A	A
	Northbound	B	B	B	B
Lusitana St/ Lisbon St	Westbound (LT*)	A	A	A	A
	Northbound	C	C	B	B
Lusitana St/ Alapaʻi St/ Lunalilo St/ Kinau St	Eastbound (LT*)	A	A	A	A
	Westbound (LT*)	A	A	A	A
	Northbound	C	C	C	C
	Southbound	B	B	B	B
South Beretania St/ Alapaʻi St	Westbound	B	B	B	B
	Northbound	C	C	C	C
	Southbound	B	B	B	B
South Beretania St/Lisbon St	Southbound	B	B	B	B
South Beretania St/ Lauhala St	Westbound	A	A	A	A
	Southbound	D	D	D	D
South Beretania St/ Punchbowl St	Westbound	C	C	B	B
	Northbound	C	C	D	D
	Southbound	D	D	C	C

*LT = Left-Turn Source: Wilson Okamoto Corporation, 2019

Year 2026 with Scenario 2

The Year 2026 cumulative AM and PM peak hour traffic conditions with the implementation of Scenario 2 (Affordable Senior Rental Apartments and Office Building) are summarized in Table 4-12.

Traffic operations with the implementation of Scenario 2 are generally expected to remain similar to without-redevelopment conditions, as described above for Scenario 1. Along Punchbowl Street, traffic operations at the intersection with South Beretania Street are expected to continue operating

at LOS "D" or better during both peak periods while those at the intersection with Vineyard Boulevard are expected to continue operating at LOS "F" or better during the AM peak period and LOS "E" or better during the PM peak period. As previously discussed, the low levels of service at that intersection are influenced by the high volume of conflicting movements at that intersection. Along Lusitana Street, traffic operations at the intersection with Lauhala Street are expected to continue operating at LOS "B" or better during both peak periods while those at the intersections with Lisbon Street and Alapaʻi Street, Kinau Street, and Lunalilo Street are expected to continue operating at LOS "C" or better during both peak periods. The remaining intersections along South Beretania Street are expected to continue operating similar to without-redevelopment conditions.

TABLE 4-12: PROJECTED YEAR 2026 (WITHOUT AND WITH SCENARIO 2)
LOS TRAFFIC OPERATING CONDITIONS

Intersection	**Approach/ Critical Movement**	**AM**		**PM**	
		Year 2026		**Year 2026**	
		w/o Proj.	**Scenario 2**	**w/o Proj**	**Scenario 2**
Vineyard Blvd/ Punchbowl St	Eastbound	E	E	E	E
	Westbound	E	E	E	E
	Northbound	F	F	E	E
	Southbound	D	D	D	D
Lusitana St/ Lauhala St	Westbound (LT*)	A	A	A	A
	Northbound	B	B	B	B
Lusitana St/ Lisbon St	Westbound (LT*)	A	A	A	A
	Northbound	c	c	B	B
Lusitana St/ Alapaʻi St/ Lunalilo St/ Kinau St	Eastbound (LT*)	A	A	A	A
	Westbound (LT*)	A	A	A	A
	Northbound	C	C	C	C
	Southbound	B	B	B	B
South Beretania St/ Alapaʻi St	Westbound	B	B	B	B
	Northbound	C	C	C	C
	Southbound	B	B	B	B
South Beretania St/ Lisbon	Southbound	B	B	B	B
South Beretania St/ Lauhala St	Westbound	A	A	A	A
	Southbound	D	D	D	D
South Beretania St/ Punchbowl St	Westbound	C	C	B	B
	Northbound	C	C	D	D
	Southbound	D	D	C	C

*LT = Left-Turn Source: Wilson Okamoto Corporation, 2019

Year 2026 with Scenario 3

The Year 2026 cumulative AM and PM peak hour traffic conditions with the implementation of Scenario 3 (Parking Structure and Office Building) are summarized in Table 4-13.

Traffic operations with the implementation of Scenario 3 are generally expected to remain similar to without project conditions, for reasons described above. Along Lusitana Street, the approaches at the intersection with Lauhala Street are expected to continue operating at LOS "B" or better during both peak periods while those at the intersections with Lisbon Street and Alapaʻi Street, Lunalilo Street, and Kinau Street are expected to continue operating at LOS "C" or better during the AM peak period and LOS "B" or better during the PM peak period. At the intersection of Lisbon Street and Lusitania Street, the trips accessing the Project Area are expected to be westbound left-turns from the uncontrolled approach of the intersection and northbound right-turns from the side street. Since these movements conflict with only one direction of traffic, these movements incur relatively less delay when entering the intersection (as opposed to a left turn from the minor street) and as such the intersection operates similar to without-redevelopment conditions.

The approaches at the study intersections along South Beretania Street are generally expected to continue operating similar to without project conditions except at the intersection with Lisbon Street. At that intersection, the southbound approach is expected to operate slightly lower from LOS "B" to LOS "C" during both peak periods. The remaining study intersections along Vineyard Boulevard are expected to continue operating similar to without-redevelopment conditions.

TABLE 4-13: PROJECTED YEAR 2026 (WITHOUT AND WITH SCENARIO 3)
LOS TRAFFIC OPERATING CONDITIONS

Intersection	**Approach/ Critical Movement**	**AM**		**PM**	
		Year 2026		**Year 2026**	
		w/o Proj	**Scenario 3**	**w/o Proj**	**Scenario 3**
Vineyard Blvd/ Punchbowl St.	Eastbound	E	E	E	E
	Westbound	E	E	E	E
	Northbound	F	F	E	E
	Southbound	D	D	D	D
Lusitana St/ Lauhala St	Westbound (LT*)	A	A	A	A
	Northbound	B	B	B	B
Lusitana St./ Lisbon St.	Westbound (LT*)	A	A	A	A
	Northbound	C	C	B	B
Lusitana St/ Alapaʻi St/ Lunalilo St/ Kinau St	Eastbound (LT*)	A	A	A	A
	Westbound (LT*)	A	A	A	A
	Northbound	C	C	C	C
	Southbound	C	C	B	B
South Beretania St/ Alapaʻi St	Westbound	B	B	B	B
	Northbound	C	C	C	C
	Southbound	B	B	B	B

Intersection	Approach/ Critical Movement	AM		PM	
		Year 2026		Year 2026	
		w/o Proj	Scenario 3	w/o Proj	Scenario 3
South Beretania St/ Lisbon	Southbound	B	C	B	C
South Beretania St/ Lauhala St	Westbound	A	A	A	A
	Southbound	D	D	D	D
South Beretania St/ Punchbowl St	Westbound	C	C	B	B
	Northbound	C	C	D	D
	Southbound	D	D	C	C

*LT = Left-Turn Source: Wilson Okamoto Corporation, 2019

4.10.2.3 RECOMMENDATIONS

Based on the analysis of the traffic data, the TIR included the following recommendations to be incorporated in the final project design for each scenario:

1. Maintain sufficient sight distance for motorists to safely enter and exit all project driveways.

2. Provide adequate on-site loading and off-loading service areas and prohibit off-site loading operations.

3. Provide adequate turn-around area for service, delivery, and refuse collection vehicles to maneuver on the project site to avoid vehicle-reversing maneuvers onto public roadways.

4. Provide sufficient turning radii at all project driveways to avoid vehicle encroachments to oncoming traffic lanes.

5. If access to the parking garage is controlled, provide sufficient storage for entering vehicles at the parking area access controls, i.e., automatic gate, etc. to ensure that queues do not extend onto the adjacent public roadways.

6. Under Scenarios 1 and 2, align the proposed parking garage driveway off the west side of Lisbon Street with the east driveway for the proposed new BWS office building or provide larger separation between the two driveways to minimize conflicting turning movements.

7. Provide sufficient width along Lisbon Street to accommodate two-way traffic. In addition, City should prohibit on-street parking unless parking can be accommodated while allowing two-way traffic.

8. Provide pedestrian connections between the Project Area and the adjacent public roadways in locations that facilitate pedestrian movement to the existing pedestrian facilities and minimize unprotected midblock crossings.

9. Consider incorporation of complete street principles, if possible, to include features that encourage walking, bicycling, and use of public transit.

10. Prepare a Construction Management Plan (CMP) for the redevelopment, which includes discussions regarding the anticipated construction schedule and phasing, as well as traffic circulation, traffic control, and parking during the construction period.

11. Prepare a Traffic Management Plan (TMP) for the redevelopment, which includes traffic circulation, parking, loading, and traffic demand management strategies

4.10.2.4 CONCLUSION

For purposes of the TIR, the redevelopment was assumed to be completed by Year 2026. Under all three redevelopment scenarios, traffic operations are generally expected to remain similar to conditions where no redevelopment occurs. Mitigations will be implemented based on the final development proposal. As such, with the implementation of the recommendations above, the proposed project is not expected to have a significant impact on traffic operations in the vicinity.

4.11 Police, Fire, and Emergency Medical Services

4.11.1 EXISTING CONDITIONS

4.11.1.1 POLICE

The Honolulu Police Department (HPD) divides the island of Oʻahu into eight patrol districts. The Project Area is in District 1, Central Honolulu, which covers the downtown Honolulu area from Liliha Street to Punahou Street and from Round Top Drive to Ala Moana Beach, including Aloha Tower. The Alapaʻi Police Headquarters, located a quarter mile away from the Project Area on South Beretania Street, is the HPD administrative headquarters. District 1 also includes a police substation on North Hotel Street in Chinatown. Other district stations are in Kalihi, Kāneʻohe, Kapolei, Pearl City, Wahiawa and Waiʻanae.

In a February 7, 2019 memo to the BWS providing comments on the project, the HPD stated:

> *The HPD is in need of additional parking spaces at its Alapaʻi headquarters for police personnel and specialty vehicles. As such, we are requesting for future consideration in leasing or purchasing parking spaces in the proposed uses for BWS Beretania Complex Parking Structure. The HPD is requesting 500 parking stalls and is amenable to further discussion.*

4.11.1.2 FIRE

The Honolulu Fire Department (HFD) provides fire protection and first responder emergency medical service to the entire island of Oʻahu. HFD divides Oʻahu into five battalions containing 44 fire stations. HFD currently has a staff of over 1,100 fire fighters. HFD is comprised of 43 engine companies, 14 ladder companies, two search and rescue companies, two hazardous materials companies, two tower companies, five tankers, two helicopters, and one helicopter tender. In addition, several jet skis and three rescue boats, including two assigned for search and rescue use and one to the Waialua Fire Station, help support HFD's mission of saving lives and protecting property (HFD, 2019, URL=https://www.honolulu.gov/hfd/abouthfd.html).

The nearest stations include Central Fire Station 01 at 104 South Beretania Street, a half mile west of the Project Area. HFD's Headquarters on 636 South Street is located a half mile southwest (makai) of the Project Area.

HFD has an agreement with the City Emergency Services Department (ESD) to send an apparatus to life-threatening calls, such as heart attacks, difficulty breathing, possible strokes, vehicle crashes, significant trauma, etc.

In a December 20, 2018 letter in response to the EISPN, the HFD provided a list of items that the project should comply with:

1. Fire department access roads shall be provided such that any portion of the facility or any portion of an exterior wall of the first story of the building is not located more than 150 feet from the fire access roads.

2. A water supply approved by the County, capable of supplying the required fire flow for fire protection, shall be provided.

3. The unobstructed width and unobstructed vertical clearance of a fire apparatus access road shall meet county requirements.

4. Submit civil drawings to the HFD for review.

4.11.1.3 EMERGENCY MEDICAL

The City ESD provides pre-hospital emergency medical care and services for Oʻahu's residents and visitors on a 24-hour basis. In 2016, emergency medical services (EMS) personnel responded to more than 85,000 emergency (911) calls and transported more than 54,000 patients to local emergency rooms.

The ESD has 21 ambulance units distributed among three districts throughout Oʻahu. All EMS ambulance units are designated as advanced life support (ALS) units, meaning they are staffed by at least one paramedic. Mobile Intensive Care Technicians (MICT) or paramedics are trained and authorized to perform advanced life support and invasive medical techniques. Emergency Medical Technicians (EMT) are trained in basic life support.

Paramedics work closely with other emergency responders to provide high quality, pre-hospital patient care. Ocean and land rescues are coordinated between the City's Ocean Safety and Lifeguard Services, EMS, the U.S. Coast Guard, HPD and the HFD.

4.11.2 POTENTIAL IMPACTS AND MITIGATION

The addition of assisted living or senior rental apartments at the Project Area will add population to a site where there are presently no permanent residents, possibly increasing localized demand on police, fire and emergency medical services. All scenarios evaluated also include new BWS office space, which will increase the number of BWS employees present on the site during weekdays.

It is anticipated that most of the future residents of the rental apartments and/or the assisted living facility are currently Hawaiʻi residents, most likely already living on Oʻahu. As such, there is not expected to be a net increase in demand for police, fire or emergency services city-wide, though

there may be some impact on localized demand. Scenario 3, Parking Structure, will not have an impact on said public services.

The redevelopment will be required to comply with the HFD requirements for appropriate access roads and water supply for firefighting. Customarily, civil engineering drawings will be submitted to HFD for review and comment.

4.12 Medical Services and Facilities

4.12.1 EXISTING CONDITIONS

The Beretania Complex is located adjacent to the Queen's Medical Center, the largest private hospital in Hawaiʻi. The Queen's Hospital was founded in 1859 by Queen Emma and King Kamehameha IV in response to the diseases that were decimating the Hawaiian population. A temporary dispensary was opened in downtown Honolulu in 1859, and the current 19-acre site at the foot of Punchbowl Crater was chosen as a permanent site. The new hospital opened its doors in 1860. The current medical campus is licensed for 505 acute and 28 sub-acute care beds and is the State's first and only Level 1 trauma center.

The Project Area is also adjacent to the Queen's Physician's Office Building (POB) I, POB II and POB III. These buildings are located on Lusitana Street and Lauhala Street.

Straub Medical Center-Hawaiʻi Pacific Health is a fully integrated not-for-profit medical center located on South King Street, approximately 0.5 miles from the Beretania Complex. Straub was founded by George F. Straub with the opening in 1921 of The Clinic, Honolulu's first group practice and specialized clinic. Over the years, The Clinic expanded into what is known today as Straub Medical Center. This medical center includes a 159-bed hospital. It is part of Hawaiʻi Pacific Health, a network of hospitals that includes Kapiʻolani Medical Center, Pali Momi Medical Center, and Wilcox Medical Center on Kauaʻi.

4.12.2 POTENTIAL IMPACTS AND MITIGATION

The construction of an assisted care living facility or senior rental apartments in proximity to existing medical facilities is a compatible and synergistic land use and will have positive impacts for the future residents and for the nearby medical service providers. The construction of a parking garage could also have a positive impact for the surrounding medical facilities if parking stalls were made available to their employees and/or customers.

4.13 Schools

4.13.1 EXISTING CONDITIONS

The Beretania Complex is within the Kaimuki-McKinley-Roosevelt Complex Area in the Honolulu District of the State Department of Education (DOE). There are several public schools within a one-mile radius of the Project Area, including six elementary schools, three middle schools and two high schools. They include Royal Elementary School, Lincoln Elementary School, Myron B. Thompson Academy (charter school), Kauluwela Elementary School, Pauoa Elementary School, Queen Kaʻahumanu Elementary School; Central Middle School, Kawānanakoa Middle School, Robert Louis Stevenson Middle School; Roosevelt High School, and McKinley High School. Private and

independent schools within the area include Saint Andrew's Schools, Seagull School's Early Education Center, Hongwanji Mission School and Soto Academy.

4.13.2 POTENTIAL IMPACTS AND MITIGATION

None of the proposed scenarios evaluated in this FEIS are expected to impact public or private schools in the area. During the EISPN comment period, the DOE in a November 28, 2018 letter, requested that two questions be addressed. First, would school age children be permitted to live in the affordable senior rental apartments? Second, what would happen to the senior rental apartments after the 65-year lease has expired? The DOE letter also noted that the site is located within the DOE's Kalihi to Ala Moana School Impact Fee District. The DOE noted that if senior rental apartments permit school aged children to reside in the project, the DOE would collect school impact fees on each unit.

If assisted care living is constructed, the use will not increase school aged children. If affordable senior rental housing is constructed, children will not be allowed to live in the units. According to federal Housing and Urban Development (HUD) regulations, in a senior living community defined as "62 and older," all residents (including spouses) must be 62 years of age or older. This means that no children are allowed to live there, even if a resident is their legal guardian.

There is the possibility that a different redevelopment scenario will be proposed that will impact school enrollment. In this case, the DOE will need to be consulted if a residential use other than those described in this FEIS is proposed.

Finally, in its letter, DOE inquired whether the apartments would be used by the wider public, including children once the site's initial lease period is complete. The uses of the property and future structures beyond the initial lease period are unknown at this time. It is anticipated that the initial lease period will be approximately 65 years, representing more than one generation, and demographic conditions in the school service area are likely to change significantly during that period. Demographic trends in the project vicinity, and throughout Oʻahu as a whole, show an aging population, with fewer school aged children. If, at the time the lease is renegotiated, uses are proposed that could have an impact on school enrollment, appropriate mitigation can be negotiated with DOE.

4.14 Parks and Recreational Facilities

4.14.1 EXISTING CONDITIONS

Public parks in the vicinity of the Beretania Complex site include the Dole Community Park, located on the north (mauka) side of the H-1 Freeway, and Thomas Square. While not a traditional public park, the Frank F. Fasi Civic Grounds provides public open space surrounding the Frank F. Fasi Municipal Building across South Beretania Street, and a five-minute walk from the Project Area.

Dole Community Park is a small community park located on Magellan Avenue, on the north (mauka) side of the H-1 Freeway. Although less than half a mile and a 10-minute walk away, access on foot from the Project Area requires use of a freeway overpass, accessed from Alapaʻi Street. Thomas Square is a 6.5-acre public park located 0.4 miles east, and an 8-minute walk on South Beretania Street. It is used for both active community events and passive recreation, including dog shows, plant sales, and cultural gatherings.

The Neal S. Blaisdell Center is located adjacent to Thomas Square, less than a half mile from the Beretania Complex. This 22.4-acre complex includes an arena, exhibition hall, meeting rooms, and concert hall. The City is proposing major renovations to the Blaisdell Center, including construction of a new Performance Hall and Sports Pavilion. The existing concert hall and arena would be retained and renovated.

4.14.2 POTENTIAL IMPACTS AND MITIGATION

During the EISPN comment period, the City Department of Parks and Recreation noted that as proposed, the Beretania Complex Redevelopment project will have no impact on any program or facility of the Department. The proposed uses at the Project Area are not likely to impact use of public parks or recreational facilities.

5.0 RELATIONSHIP TO LAND USE PLANS, POLICIES AND CONTROLS

This chapter discusses the proposed project's conformance with pertinent State and City land use plans, policies and controls.

5.1 State of Hawai'i

5.1.1 STATE LAND USE LAW (CHAPTER 205, HRS)

The State Land Use Law, Chapter 205, HRS, is intended to preserve, protect, and encourage the development of lands in the State for uses that are best suited to the public health and welfare of Hawai'i's people. The State Land Use Commission (LUC) classifies all lands into four land use districts: Urban, Conservation, Agricultural, and Rural. The entire Beretania Complex, including the Project Area, is in the State Urban District as shown in Figure 5-1. The Urban District is characterized by "city-like" concentrations of people, structures, streets, urban level of services and other related land uses.

Discussion: The proposed redevelopment of the Project Area to uses such as Assisted Care Living, Affordable Senior Rental Apartments, or parking structure is consistent with the State Urban District.

5.1.2 HAWAI'I ENVIRONMENTAL REVIEW LAW (CHAPTER 343, HRS)

As previously discussed in Section 1.5, the Proposed Action is subject to the State's Environmental Review Law as set forth in Chapter 343, HRS.

In determining whether an action may have a significant impact on the environment, agencies and applicants are tasked to consider the sum of effects on the quality of the environment, and evaluate the overall and cumulative effects of the action. In most instances, an action shall be determined to have a significant effect on the environment if it meets any of the following criteria (from Section 11-200-12, HAR):

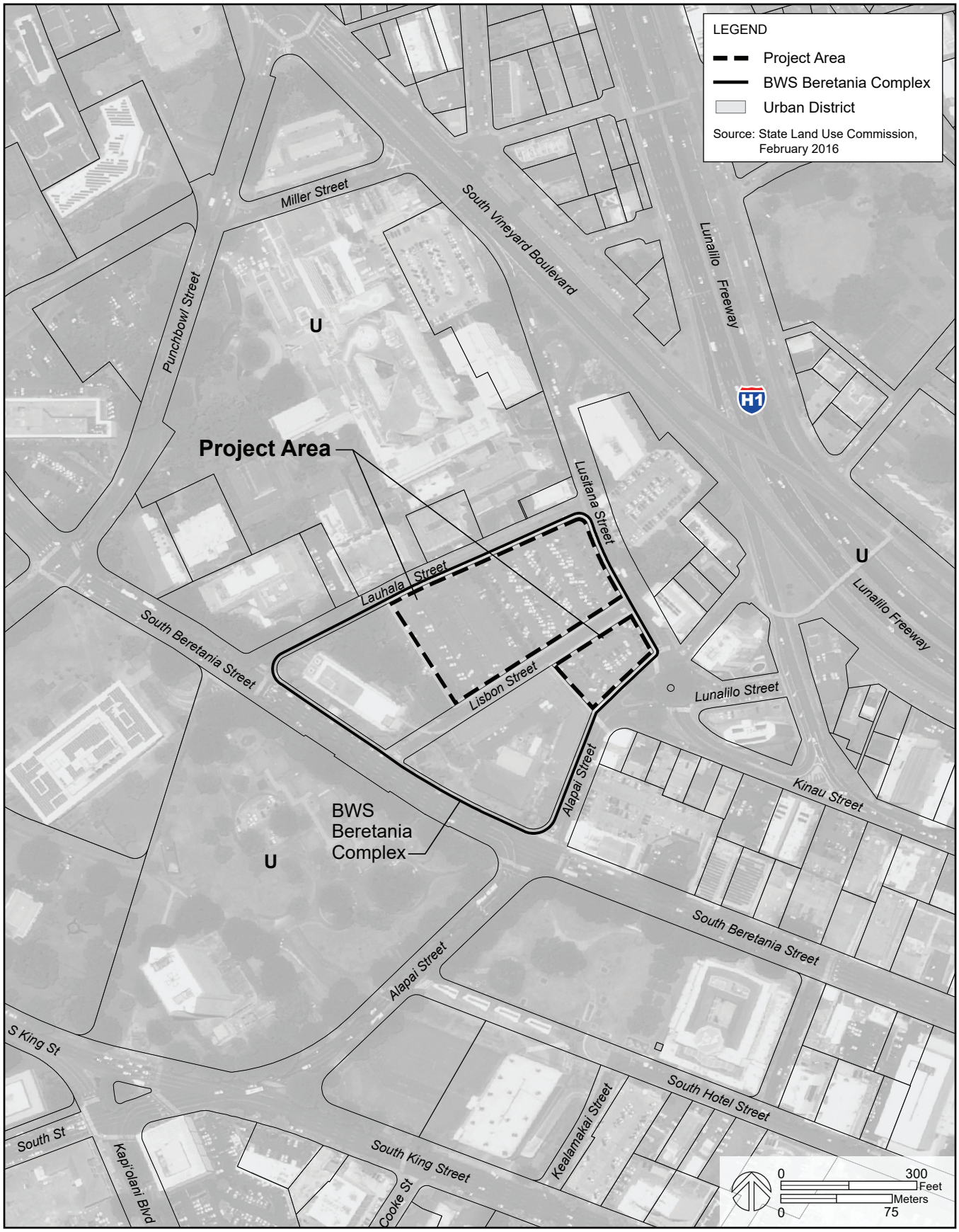
1. Involves an irrevocable commitment to loss or destruction of any natural or cultural resource;

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

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

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

5. Substantially affects public health;



State Land Use District **Figure 5-1**

Board of Water Supply Beretania Complex Redevelopment

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Board of Water Supply

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

7. Involves a substantial degradation of environmental quality;

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

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

10. Detrimentally affects air or water quality or ambient noise levels;

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

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

13. Requires substantial energy consumption.

Discussion: Based on information and input collected and assessed to date, the BWS has determined that the project meets two significance criteria defined in HAR §11-200. The proposed action has the potential to curtail the range of beneficial uses of the environment and may involve substantial secondary impacts on public roadways, traffic, and public facilities. Therefore, BWS has determined that the project will require the preparation of an Environmental Impact Statement (EIS) versus an Environmental Assessment and has elected to move forward with the preparation of the EIS.

5.1.3 STATE ENVIRONMENTAL POLICY (CHAPTER 344, HRS)

The purpose of HRS Chapter 344 is to establish a state policy, which will encourage productive and enjoyable harmony between people and their environment, promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of humanity, and enrich the understanding of the ecological systems and natural resources important to the people of Hawaii. Chapter 344 sets the policy of the State through its programs, authorities and resources to:

(1) Conserve the natural resources, so that land, water, mineral, visual, air and other natural resources are protected by controlling pollution, by preserving or augmenting natural resources, and by safeguarding the State's unique natural environmental characteristics in a manner which will foster and promote the general welfare, create and maintain conditions under which humanity and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of the people of Hawaii.

(2) Enhance the quality of life by:

(C) Establishing communities which provide a sense of identity, wise use of land, efficient transportation, and aesthetic and social satisfaction in harmony with the natural environment which is uniquely Hawaiian; and

Discussion: The Proposed Action involves leasing City-owned property to a private developer, who will redevelop existing ground level parking areas to a more intensive land use, consistent with the existing A-2 Apartment zoning. The Proposed Action is intended to create a revenue stream to help support BWS operations and its capital improvement program. The redevelopment also offers the potential to meet a market need for assisted care living or affordable senior rentals, in an area that is conveniently located near existing medical facilities and public services.

5.1.3.1 ENVIRONMENTAL GUIDELINES

In pursuance of the State policy to conserve the natural resources and enhance the quality of life, all agencies, in the development of programs, shall, insofar as practicable, consider guidelines related to (1) population; (2) land, water, mineral, visual, air and other natural resources; (3) flora and fauna; (4) parks, recreation and open space; (5) economic development; (6) transportation; (7) energy; (8) community life and housing; (9) education and culture; and (10) citizen participation. The Proposed Action is consistent with the following guidelines:

(2) Land, water, mineral, visual, air, and other natural resources.

(A) Encourage management practices, which conserve and fully utilize all natural resources;

Discussion: The proposed redevelopment will be designed and constructed in accordance with sound management practices. Construction BMPs will be employed to address construction period noise, dust, and stormwater runoff. There are no sensitive natural resources in the Project Area.

(F) Maintain an integrated system of State land use planning which coordinates the state and county general plans;

Discussion: The anticipated redevelopment of the Project Area is consistent with both State land use plans and the City General Plan and Primary Urban Center Development Plan.

(8) Community life and housing.

(A) Foster lifestyles compatible with the environment; preserve the variety of lifestyles traditional to Hawaii through the design and maintenance of neighborhoods which reflect the culture and mores of the community;

(B) Develop communities which provide a sense of identity and social satisfaction in harmony with the environment and provide internal opportunities for shopping, employment, education, and recreation;

(D) Foster safe, sanitary, and decent homes;

Discussion: It is anticipated that the redevelopment will be compatible with the existing A-2 Apartment zoning, either assisted care living or affordable senior apartments. In either case, the use will further the objective of fostering safe, sanitary and decent homes. The surrounding neighborhood, with its proximity to the Queens Medical Center, is compatible with this type of housing. The redevelopment will support the guidelines of preserving lifestyles tradition to Hawaiʻi

and creating neighborhoods that reflect the culture and mores of the community through appropriate design and compliance with height and open space requirements of the Hawai‘i Capital Special District, Queen’s Medical Center Precinct.

5.1.4 HAWAI‘I STATE PLAN (CHAPTER 226, HRS)

The Hawai‘i State Plan, embodied in HRS Chapter 226, serves as a guide for the future long-range development of the State. It identifies goals, objectives, policies, and priorities for development and growth. It also provides a basis for prioritizing and allocating the limited resources such as public funds, services, human resources, land, energy, and water.

The Hawai‘i State Plan is divided into three parts:

- *Part I, Overall Theme, Goals, Objectives, and Policies*. This part identifies objectives and focuses on general topic areas including population, economy, physical environment, facility systems, and socio-cultural advancement.
- *Part II, Planning Coordination and Implementation*. This part establishes a statewide planning system to coordinate major State and City activities and to implement the overall theme, goals, objectives, policies, and priority guidelines. These are implemented through State Functional Plans.
- *Part III, Priority Guidelines*. This part establishes overall priority guidelines to address areas of statewide concern.

The discussion below pertains to the project’s compatibility with Part I, relevant State Plan goals, objectives, policies and priority guidelines.

5.1.4.1 PART I: OVERALL THEME, GOALS, OBJECTIVES AND POLICIES

HAWAI‘I STATE PLAN, CHAPTER 226, HRS *(Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)*	C	I	N/A
PART I. OVERALL THEME, GOALS, OBJECTIVES AND POLICIES			
HRS § 226-1: Findings and Purpose			
HRS § 226-2: Definitions			
HRS § 226-3: Overall Theme.			
Hawai‘i’s people, as both individuals and groups, generally accept and live by a number of principles or values which are an integral part of society. This concept is the unifying theme of the State Plan. The following principles or values are established as the overall theme of the Hawai‘i State Plan: (1) Individual and family self-sufficiency refers to the rights of people to maintain as much self-reliance as possible. It is an expression of the value of independence, in other words, being able to freely pursue personal interests and goals. Self-sufficiency means that individuals and families can express and maintain their own self-interest so long as that self-interest does not adversely affect the general welfare. Individual freedom and individual achievement are possible only by reason of other people in society, the institutions, arrangements and customs that they maintain, and the rights and responsibilities that they sanction. (2) Social and economic mobility refers to the right of individuals to choose and to have the opportunities for choice available to them. It is a corollary to self-sufficiency. Social and economic mobility means that opportunities and incentives are available for people to seek out their own levels of social and economic fulfillment. (3) Community or social well-being is a value that encompasses many things. In essence, it refers to healthy social, economic, and physical environments that benefit the community as a whole. A sense of social responsibility, of caring for others and for the well-being of our community and of participating in social and political life, are important aspects of this concept. It further implies the aloha spirit--attitudes of tolerance, respect, cooperation and unselfish giving, within which Hawai‘i’s society can progress.			

HAWAI'I STATE PLAN, CHAPTER 226, HRS ***(Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)***	**C**	**I**	**N/A**
One of the basic functions of our society is to enhance the ability of individuals and groups to pursue their goals freely, to satisfy basic needs and to secure desired socio-economic levels. The elements of choice and mobility within society's legal framework are fundamental rights. Society's role is to encourage conditions within which individuals and groups can approach their desired levels of self-reliance and self-determination. This enables people to gain confidence and self-esteem; citizens contribute more when they possess such qualities in a free and open society. Government promotes citizen freedom, self-reliance, self-determination, social and civic responsibility and goals achievement by keeping order, by increasing cooperation among many diverse individuals and groups, and by fostering social and civic responsibilities that affect the general welfare. The greater the number and activities of individuals and groups, the more complex government's role becomes. The function of government, however, is to assist citizens in attaining their goals. Government provides for meaningful participation by the people in decision-making and for effective access to authority as well as an equitable sharing of benefits. Citizens have a responsibility to work with their government to contribute to society's improvement. They must also conduct their activities within an agreed-upon legal system that protects human rights.			
Discussion: The primary purpose of the project is to provide a revenue stream for BWS, which will help offset a portion of operating and capital improvement costs. This will help a public utility continue to meet its mission to provide citizens with a safe, dependable, and affordable drinking water. All of the potential uses evaluated meet a need and will contribute to the community well-being. Assisted care living facility or affordable senior rental apartments will provide housing options for the State's older adult population, a demographic that continues to increase. This directly supports self-sufficiency, individual and family self-reliance, and provides opportunities for choice and social well-being. Construction of a parking structure will meet the needs of nearby government offices and employees. All scenarios will include a new BWS office building, supporting its operations and ability to meet its public mission.			
HRS § 226-4: State Goals.			
In order to guarantee, for the present and future generations, those elements of choice and mobility that insure that individuals and groups may approach their desired levels of self-reliance and self-determination, it shall be the goal of the State to achieve:			
Goals:			
(1) A strong, viable economy, characterized by stability, diversity and growth that enables fulfillment of the needs and expectations of Hawai'i's present and future generations.	X		
(2) A desired physical environment, characterized by beauty, cleanliness, quiet, stable natural systems, and uniqueness, that enhances the mental and physical well-being of the people.	X		
(3) Physical, social and economic well-being, for individuals and families in Hawai'i, that nourishes a sense of community responsibility, of caring and of participation in community life.	X		
Discussion: The Proposed Action supports a strong, viable economy by supporting the mission and operations of the BWS, allowing it to continue providing a safe and dependable water supply to O'ahu residents. All of the development scenarios will support a viable economy, diversity and growth that enables fulfillment of needs for present and future generations. Potential assisted care living and housing options contribute to social and economic well-being for individuals and families.			
HRS § 226-5: Objectives and policies for population.			
(a) Objective: It shall be the objective in planning for the State's population to guide population growth to be consistent with the achievement of physical, economic and social objectives contained in this chapter.			
(b) Policies:			
(1) Manage population growth statewide in a manner that provides increased opportunities for Hawai'i's people to pursue their physical, social and economic aspirations while recognizing the unique needs of each county.			X

HAWAI'I STATE PLAN, CHAPTER 226, HRS *(Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)*	C	I	N/A
(2) Encourage an increase in economic activities and employment opportunities on the neighbor islands consistent with community needs and desires.			X
(3) Promote increased opportunities for Hawai'i's people to pursue their socio-economic aspirations throughout the islands.	X		
(4) Encourage research activities and public awareness programs to foster an understanding of Hawai'i's limited capacity to accommodate population needs and to address concerns resulting from an increase in Hawai'i's population.			X
(5) Encourage federal actions and coordination among major governmental agencies to promote a more balanced distribution of immigrants among the states, provided that such actions do not prevent the reunion of immediate family members.			X
(6) Pursue an increase in federal assistance for states with a greater proportion of foreign immigrants relative to their state's population.			X
(7) Plan the development and availability of land and water resources in a coordinated manner so as to provide for the desired levels of growth in each geographic area.			X
Discussion: The Proposed Action does not guide or impact population growth or distribution. However, the development of assisted living and affordable senior rentals responds to a documented need for this type of housing product on O'ahu. As the population ages, housing needs change through the lifetime. The creation of appropriate and conveniently located housing targeted toward the senior population supports the physical, social and economic aspirations of Hawai'i's families.			
HRS § 226-6: Objectives and policies for the economy in general.			
(a) Objectives: Planning for the State's economy in general shall be directed toward achievement of the following objectives:			
(1) Increased and diversified employment opportunities to achieve full employment, increased income and job choice, and improved living standards for Hawai'i's people, while at the same time stimulating the development and expansion of economic activities capitalizing on defense, dual-use, and science and technology assets, particularly on the neighbor islands where employment opportunities may be limited.			X
(2) A steadily growing and diversified economic base that is not overly dependent on a few industries, and includes the development and expansion of industries on the neighbor islands.	X		
(b) Policies:			
(1) Promote and encourage entrepreneurship within Hawai'i by residents and nonresidents of the State.			X
(2) Expand Hawai'i's national and international marketing, communication, and organizational ties, to increase the State's capacity to adjust to and capitalize upon economic changes and opportunities occurring outside the State.			X
(3) Promote Hawai'i as an attractive market for environmentally and socially sound investment activities that benefit Hawai'i's people.			X
(4) Transform and maintain Hawai'i as a place that welcomes and facilitates innovative activity that may lead to commercial opportunities.			X
(5) Promote innovative activity that may pose initial risks, but ultimately contribute to the economy of Hawai'i.			X
(6) Seek broader outlets for new or expanded Hawai'i business investments.			X
(7) Expand existing markets and penetrate new markets for Hawai'i's products and services.			X
(8) Assure that the basic economic needs of Hawai'i's people are maintained in the event of disruptions in overseas transportation.			X

HAWAI'I STATE PLAN, CHAPTER 226, HRS *(Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)*	C	I	N/A
(9) Strive to achieve a level of construction activity responsive to, and consistent with, state growth objectives.			X
(10) Encourage the formation of cooperatives and other favorable marketing arrangements at the local or regional level to assist Hawai'i's small scale producers, manufacturers, and distributors.			X
(11) Encourage labor-intensive activities that are economically satisfying and which offer opportunities for upward mobility.			X
(12) Encourage innovative activities that may not be labor-intensive, but may otherwise contribute to the economy of Hawai'i.	X		
(13) Foster greater cooperation and coordination between the government and private sectors in developing Hawai'i's employment and economic growth opportunities.			X
(14) Stimulate the development and expansion of economic activities which will benefit areas with substantial or expected employment problems.			X
(15) Maintain acceptable working conditions and standards for Hawai'i's workers.	X		
(16) Provide equal employment opportunities for all segments of Hawai'i's population through affirmative action and nondiscrimination measures.	X		
(17) Stimulate the development and expansion of economic activities capitalizing on defense, dual-use, and science and technology assets, particularly on the neighbor islands where employment opportunities may be limited.			X
(18) Encourage businesses that have favorable financial multiplier effects within Hawai'i's economy, particularly with respect to emerging industries in science and technology.			X
(19) Promote and protect intangible resources in Hawai'i, such as scenic beauty and the aloha spirit, which are vital to a healthy economy.			X
(20) Increase effective communication between the educational community and the private sector to develop relevant curricula and training programs to meet future employment needs in general, and requirements of new, potential growth industries in particular.			X
(21) Foster a business climate in Hawai'i-including attitudes, tax and regulatory policies, and financial and technical assistance programs-that is conducive to the expansion of existing enterprises and the creation and attraction of new business and industry.			X
Discussion: The redevelopment of the Project Area and the potential uses proposed are not directly applicable to these economic and objectives. However, temporary construction jobs will be created, and the development of an assisted care living facility could encourage an industry that while not labor intensive, can contribute to the local economy (policy 12). Acceptable working conditions and standards will be maintained for BWS employees (policy 15) through the provision of additional office space as part of the redevelopment.			
HRS § 226-7: Objectives and policies for the economy—agriculture			
(a) Objectives: Planning for the State's economy with regard to agriculture shall be directed towards			
(1) Viability of Hawai'i's sugar and pineapple industries.			X
(2) Growth and development of diversified agriculture throughout the State.			X
(3) An agriculture industry that continues to constitute a dynamic and essential component of Hawai'i's strategic, economic, and social well-being.			X
(b) Policies:			
(1) Establish a clear direction for Hawai'i's agriculture through stakeholder commitment and advocacy.			X
(2) Encourage agriculture by making best use of natural resources.			X
(3) Provide the governor and the legislature with information and options needed for prudent decision making for the development of agriculture.			X

HAWAI'I STATE PLAN, CHAPTER 226, HRS *(Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)*	C	I	N/A
(4) Establish strong relationships between the agricultural and visitor industries for mutual marketing benefits.			X
(5) Foster increased public awareness and understanding of the contributions and benefits of agriculture as a major sector of Hawai'i's economy.			X
(6) Seek the enactment and retention of federal and state legislation that benefits Hawai'i's agricultural industries.			X
(7) Strengthen diversified agriculture by developing an effective promotion, marketing, and distribution system between Hawai'i's food producers and consumers in the State, nation, and world.			X
(8) Support research and development activities that strengthen economic productivity in agriculture, stimulate greater efficiency, and enhance the development of new products and agricultural by-products.			X
(9) Enhance agricultural growth by providing public incentives and encouraging private initiatives.			X
(10) Assure the availability of agriculturally suitable lands with adequate water to accommodate present and future needs.			X
(11) Increase the attractiveness and opportunities for an agricultural education and livelihood.			X
(12) In addition to the State's priority on food, expand Hawai'i's agricultural base by promoting growth and development of flowers, tropical fruits and plants, livestock, feed grains, forestry, food crops, aquaculture, and other potential enterprises.			X
(13) Promote economically competitive activities that increase Hawai'i's agricultural self-sufficiency, including the increased purchase and use of Hawai'i-grown food and food products by residents, businesses, and governmental bodies as defined under section 103D-104.			X
(14) Promote and assist in the establishment of sound financial programs for diversified agriculture.			X
(15) Institute and support programs and activities to assist the entry of displaced agricultural workers into alternative agricultural or other employment.			X
(16) Facilitate the transition of agricultural lands in economically nonfeasible agricultural production to economically viable agricultural uses.			X
(17) Perpetuate, promote, and increase use of traditional Hawaiian farming systems, such as the use of loko i'a, māla, and irrigated lo'i, and growth of traditional Hawaiian crops, such as kalo, 'uala, and 'ulu.			X
(18) Increase and develop small-scale farms.			X
Discussion: The Proposed Action is located in an urban, developed area and has no impact on agricultural lands or activities.			
HRS § 226-8: Objectives and policies for the economy—visitor industry			
(a) Objectives: Planning for the State's economy with regard to the visitor industry shall be directed towards the achievement of the objective of a visitor industry that constitutes a major component of steady growth for Hawai'i's economy.			
(b) Policies:			
(1) Support and assist in the promotion of Hawai'i's visitor attractions and facilities.			X
(2) Ensure that visitor industry activities are in keeping with the social, economic, and physical needs and aspirations of Hawai'i's people.			X
(3) Improve the quality of existing visitor destination areas by utilizing Hawai'i's strengths in science and technology.			X

HAWAI'I STATE PLAN, CHAPTER 226, HRS *(Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)*	C	I	N/A
(4) Encourage cooperation and coordination between the government and private sectors in developing and maintaining well-designed, adequately serviced visitor industry and related developments which are sensitive to neighboring communities and activities.			X
(5) Develop the industry in a manner that will continue to provide new job opportunities and steady employment for Hawai'i's people.			X
(6) Provide opportunities for Hawai'i's people to obtain job training and education that will allow for upward mobility within the visitor industry.			X
(7) Foster a recognition of the contribution of the visitor industry to Hawai'i's economy and the need to perpetuate the aloha spirit.			X
(8) Foster an understanding by visitors of the aloha spirit and of the unique and sensitive character of Hawai'i's cultures and values.			X
Discussion: The Proposed Action will have no impact on the visitor industry or the objectives and policies supporting the visitor industry.			
HRS § 226-9: Objective and policies for the economy—federal expenditures			
(a) Objective: Planning for the State's economy with regard to federal expenditures shall be directed towards achievement of the objective of a stable federal investment base as an integral component of Hawai'i's economy.			
(b) Policies:			
(1) Encourage the sustained flow of federal expenditures in Hawai'i that generates long-term government civilian employment.			X
(2) Promote Hawai'i's supportive role in national defense, in a manner consistent with Hawai'i's social, environmental, and cultural goals by building upon dual-use and defense applications to develop thriving ocean engineering, aerospace research and development, and related dual-use technology sectors in Hawai'i's economy.			X
(3) Promote the development of federally supported activities in Hawai'i that respect state-wide economic concerns, are sensitive to community needs, and minimize adverse impacts on Hawai'i's environment.			X
(4) Increase opportunities for entry and advancement of Hawai'i's people into federal government service.			X
(5) Promote federal use of local commodities, services, and facilities available in Hawai'i.			X
(6) Strengthen federal-state-county communication and coordination in all federal activities that affect Hawai'i.			X
(7) Pursue the return of federally controlled lands in Hawai'i that are not required for either the defense of the nation or for other purposes of national importance, and promote the mutually beneficial exchanges of land between federal agencies, the State, and the counties.			X
Discussion: The Project Area is a city-owned site and its redevelopment will have no impact on federal activities or expenditures.			
HRS § 226-10: Objectives and policies for the economy—potential growth and innovative activities.			
(a) Objective: Planning for the State's economy with regard to potential growth and innovative activities shall be directed towards achievement of the objective of development and expansion of potential growth and innovative activities that serve to increase and diversify Hawai'i's economic base.			
(b) Policies:			
(1) Facilitate investment and employment in economic activities that have the potential to expand and diversify Hawai'i's economy, including but not limited to diversified agriculture, aquaculture, renewable energy development, creative media, health care, and science and technology-based sectors.	X		

HAWAI'I STATE PLAN, CHAPTER 226, HRS ***(Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)***	C	I	N/A
(2) Facilitate investment in innovative activity that may pose risks or be less labor- intensive than other traditional business activity, but if successful, will generate revenue in Hawai'i through the export of services or products or substitution of imported services or products.			X
(3) Encourage entrepreneurship in innovative activity by academic researchers and instructors who may not have the background, skill, or initial inclination to commercially exploit their discoveries or achievements.			X
(4) Recognize that innovative activity is not exclusively dependent upon individuals with advanced formal education, but that many self-taught, motivated individuals are able, willing, sufficiently knowledgeable, and equipped with the attitude necessary to undertake innovative activity.			X
(5) Increase the opportunities for investors in innovative activity and talent engaged in innovative activity to personally meet and interact at cultural, art, entertainment, culinary, athletic, or visitor-oriented events without a business focus.			X
(6) Expand Hawai'i's capacity to attract and service international programs and activities that generate employment for Hawai'i's people.			X
(7) Enhance and promote Hawai'i's role as a center for international relations, trade, finance, services, technology, education, culture, and the arts.			X
(8) Accelerate research and development of new energy-related industries based on wind, solar, ocean, and underground resources and solid waste.			X
(9) Promote Hawai'i's geographic, environmental, social, and technological advantages to attract new economic activities into the State.			X
(10) Provide public incentives and encourage private initiative to attract new industries that best support Hawai'i's social, economic, physical, and environmental objectives.			X
(11) Increase research and the development of ocean-related economic activities such as mining, food production, and scientific research.			X
(12) Develop, promote, and support research and educational and training programs that will enhance Hawai'i's ability to attract and develop economic activities of benefit to Hawai'i.			X
(13) Foster a broader public recognition and understanding of the potential benefits of new, or innovative growth-oriented industry in Hawai'i.			X
(14) Encourage the development and implementation of joint federal and state initiatives to attract federal programs and projects that will support Hawai'i's social, economic, physical, and environmental objectives.			X
(15) Increase research and development of businesses and services in the telecommunications and information industries.			X
(16) Foster the research and development of nonfossil fuel and energy efficient modes of transportation.			X
(17) Recognize and promote health care and health care information technology as growth industries.	X		
Discussion: If assisted care living is constructed at the site, the project could facilitate investment and employment growth in economic activities related to health care, and foster connections with the adjacent Queen's Medical Center (policies 1 and 17).			
HRS § 226-10.5: Objectives and policies for the economy – information industry			
(a) Objective: Planning for the State's economy with regard to telecommunications and information technology shall be directed toward recognizing that broadband and wireless communication capability and infrastructure are foundations for an innovative economy and positioning Hawai'i as a leader in broadband and wireless communications and applications in the Pacific Region.			
(b) Policies:			

HAWAI'I STATE PLAN, CHAPTER 226, HRS ***(Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)***	C	I	N/A
(1) Promote efforts to attain the highest speeds of electronic and wireless communication within Hawai'i and between Hawai'i and the world, and make high speed communication available to all residents and businesses in Hawai'i.			X
(2) Encourage the continued development and expansion of the telecommunications infrastructure serving Hawai'i to accommodate future growth and innovation in Hawai'i's economy.			X
(3) Facilitate the development of new or innovative business and service ventures in the information industry which will provide employment opportunities for the people of Hawai'i.			X
(4) Encourage mainland-and foreign-based companies of all sizes, whether information technology-focused or not, to allow their principals, employees, or contractors to live in and work from Hawai'i, using technology to communicate with their headquarters, offices, or customers located out-of-state.			X
(5) Encourage greater cooperation between the public and private sectors in developing and maintaining a well-designed information industry.			X
(6) Ensure that the development of new businesses and services in the industry are in keeping with the social, economic, and physical needs and aspirations of Hawai'i's people.			X
(7) Provide opportunities for Hawai'i's people to obtain job training and education that will allow for upward mobility within the information industry.			X
(8) Foster a recognition of the contribution of the information industry to Hawai'i's economy.			X
(9) Assist in the promotion of Hawai'i as a broker, creator, and processor of information in the Pacific.			X
Discussion: While the potential uses at the site do not directly pertain to the information industry, the new BWS office building and/or an assisted care living facility could utilize new information and technology developed to support the medical industry.			
HRS §226-11: Objectives and policies for the physical environment—land-based, shoreline, and marine resources.			
(a) Objectives: Planning for the State's physical environment with regard to land-based, shoreline, and marine resources shall be directed towards achievement of the following objectives:			
(1) Prudent use of Hawai'i's land-based, shoreline, and marine resources.	X		
(2) Effective protection of Hawai'i's unique and fragile environmental resources.			X
(b) Policies:			
(1) Exercise an overall conservation ethic in the use of Hawai'i's natural resources.			X
(2) Ensure compatibility between land-based and water-based activities and natural resources and ecological systems.	X		
(3) Take into account the physical attributes of areas when planning and designing activities and facilities.	X		
(4) Manage natural resources and environs to encourage their beneficial and multiple use without generating costly or irreparable environmental damage.			X
(5) Consider multiple uses in watershed areas, provided such uses do not detrimentally affect water quality and recharge functions.			X
(6) Encourage the protection of rare or endangered plant and animal species and habitats native to Hawai'i.			X
(7) Provide public incentives that encourage private actions to protect significant natural resources from degradation or unnecessary depletion.			X
(8) Pursue compatible relationships among activities, facilities, and natural resources.	X		

HAWAI'I STATE PLAN, CHAPTER 226, HRS ***(Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)***	**C**	**I**	**N/A**
(9) Promote increased accessibility and prudent use of inland and shoreline areas for public recreational, educational, and scientific purposes.			X
Discussion: The Project Area is not located on the shoreline and is within a developed urban area of Honolulu, and there are no significant natural resources, including rare or endangered plant or animal species. However, the proposed redevelopment will incorporate principles of sound physical planning, and take into account the physical attributes of the site and compatibility with surrounding land uses. A future assisted care living facility, senior rental apartment or parking structure are all compatible with existing BWS uses, which will remain, and with the surrounding land uses, including the Queen's Medical Center and surrounding medical office buildings.			
HRS §226-12: Objective and policies for the physical environment—scenic, natural beauty, and historic resources.			
(a) Objective: Planning for the State's physical environment shall be directed towards achievement of the objective of enhancement of Hawai'i's scenic assets, natural beauty, and multi-cultural/historical resources.			
(b) Policies:			
(1) Promote the preservation and restoration of significant natural and historic resources.	X		
(2) Provide incentives to maintain and enhance historic, cultural, and scenic amenities.	X		
(3) Promote the preservation of views and vistas to enhance the visual and aesthetic enjoyment of mountains, ocean, scenic landscapes, and other natural features.	X		
(4) Protect those special areas, structures, and elements that are an integral and functional part of Hawai'i's ethnic and cultural heritage.	X		
(5) Encourage the design of developments and activities that complement the natural beauty of the islands.	X		
Discussion: There are no significant natural resources in the Project Area but existing BWS buildings have historical architectural value. They are not part of the Project Area, and will not be modified or moved. However, the construction of several ten-story buildings could adversely affect the setting, feeling and association to these structures when viewed from South Beretania Street. The site's open, low rise character would be physically and visually changed. Impacts to historic and scenic resources are discussed in Chapter 4 of this DEIS. The Project Area is within the Queen's Hospital Precinct of the Hawai'i Capital Special District and is designated as an architecturally significant structure and site. The Queen's Hospital Precinct has a 100-foot height limit and requires 40% open space. Future redevelopment will adhere to these conditions of the district. The new structures will be barely noticeable when looking makai from the Punchbowl lookout, as the appearance, height and mass of the buildings are similar to the surrounding urban landscape. The project will not impact the park-like setting of the Hawai'i Capital Special District. An archaeological inventory survey (AIS) in 2017 identified a historic burial located in TMK 2-1-036:005, within the current Project Area. A burial treatment plan was developed for that historic property and approved by the O'ahu Island Burial Council. The agreed upon long-term protection and preservation measures will be followed.			
HRS § 226-13: Objectives and policies for the physical environment—land, air, and water quality.			
(a) Objectives: Planning for the State's physical environment with regard to land, air, and water quality shall be directed towards achievement of the following objectives:			
(1) Maintenance and pursuit of improved quality in Hawai'i's land, air, and water resources.	X		
(2) Greater public awareness and appreciation of Hawai'i's environmental resources.			X
(b) Policies:			
(1) Foster educational activities that promote a better understanding of Hawai'i's limited environmental resources.			X
(2) Promote the proper management of Hawai'i's land and water resources.	X		
(3) Promote effective measures to achieve desired quality in Hawai'i's surface, ground, and coastal waters.	X		

HAWAI'I STATE PLAN, CHAPTER 226, HRS ***(Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)***	**C**	**I**	**N/A**
(4) Encourage actions to maintain or improve aural and air quality levels to enhance the health and well-being of Hawai'i's people.	X		
(5) Reduce the threat to life and property from erosion, flooding, tsunamis, hurricanes, earthquakes, volcanic eruptions, and other natural or man-induced hazards and disasters.			X
(6) Encourage design and construction practices that enhance the physical qualities of Hawai'i's communities.	X		
(7) Encourage urban developments in close proximity to existing services and facilities.	X		
(8) Foster recognition of the importance and value of the land, air, and water resources to Hawai'i's people, their cultures and visitors.			X
Discussion: There will be short-term construction related impacts to air and water quality, and these will be adequately mitigated through best management practices. These are described in Chapter 4 of this DEIS. The future Beretania Complex Redevelopment will incorporate design principles and features that promote water and energy conservation. The site is located outside of the flood and tsunami hazard areas. The project site is within proximity to and compatible with existing residential development in the A-2 zoning district. The site is convenient to existing public services, including the Queens Medical Center, and State and municipal government facilities.			
HRS § 226-14: Objective and policies for facility systems—in general.			
(a) Objective: Planning for the State's facility systems in general shall be directed towards achievement of the objective of water, transportation, waste disposal, and energy and telecommunication systems that support statewide social, economic, and physical objectives.			
(b) Policies:			
(1) Accommodate the needs of Hawai'i's people through coordination of facility systems and capital improvement priorities in consonance with state and county plans.	X		
(2) Encourage flexibility in the design and development of facility systems to promote prudent use of resources and accommodate changing public demands and priorities.			X
(3) Ensure that required facility systems can be supported within resource capacities and at reasonable cost to the user.	X		
(4) Pursue alternative methods of financing programs and projects and cost-saving techniques in the planning, construction, and maintenance of facility systems.			X
Discussion: There will be short-term construction related impacts to air and water quality, but these will be adequately mitigated through best management practices. These area described in Chapter 4 of this DEIS. Future uses such as a new BWS office building, assisted care living facility or affordable senior rentals will connect to the existing wastewater, water, and electrical systems which are adequate to serve the development.			
HRS § 226-15: Objectives and policies for facility systems—solid and liquid wastes.			
(a) Objectives: Planning for the State's facility systems with regard to solid and liquid wastes shall be directed towards the achievement of the following objectives:			
(1) Maintenance of basic public health and sanitation standards relating to treatment and disposal of solid and liquid wastes.	X		
(2) Provision of adequate sewerage facilities for physical and economic activities that alleviate problems in housing, employment, mobility, and other areas.	X		
(b) Policies:			
(1) Encourage the adequate development of sewerage facilities that complement planned growth.			X
(2) Promote re-use and recycling to reduce solid and liquid wastes and employ a conservation ethic.	X		

HAWAI'I STATE PLAN, CHAPTER 226, HRS ***(Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)***	**C**	**I**	**N/A**
(3) Promote research to develop more efficient and economical treatment and disposal of solid and liquid wastes.			X
Discussion: The future assisted care living facility or affordable senior rentals will connect to the municipal wastewater system which is adequate to serve the development. Residential solid waste will be collected by a private waste contractor.			
HRS § 226-16: Objective and policies for facility systems—water.			
(a) Objective: Planning for the State's facility systems with regard to water shall be directed towards achievement of the objective of the provision of water to adequately accommodate domestic, agricultural, commercial, industrial, recreational, and other needs within resource capacities.			
(b) Policies:			
(1) Coordinate development of land use activities with existing and potential water supply.	X		
(2) Support research and development of alternative methods to meet future water requirements well in advance of anticipated needs.	X		
(3) Reclaim and encourage the productive use of runoff water and wastewater discharges.			X
(4) Assist in improving the quality, efficiency, service, and storage capabilities of water systems for domestic and agricultural use.	X		
(5) Support water supply services to areas experiencing critical water problems.			X
(6) Promote water conservation programs and practices in government, private industry, and the general public to help ensure adequate water to meet long-term needs.	X		
Discussion: The primary purpose of the redevelopment project is to create a revenue stream for BWS that will help offset it operating and capital improvement costs. Part of the redevelopment will include a new BWS office building and parking structure to support its operations. In this way, the Proposed Action directly supports the BWS mission, which is to provide a safe and dependable water system. Appropriate water infrastructure will be provided to whatever use is proposed by the developer.			
HRS § 226-17: Objectives and policies for facility systems—transportation.			
(a) Objective: Planning for the State's facility systems with regard to energy shall be directed toward the achievement of the following objectives:			
(1) An integrated multi-modal transportation system that services statewide needs and promotes the efficient, economical, safe, and convenient movement of people and goods.			X
(2) A statewide transportation system that is consistent with and will accommodate planned growth objectives throughout the State.			X
(b) Policies:			
(1) Design, program, and develop a multi-modal system in conformance with desired growth and physical development as stated in this chapter;			X
(2) Coordinate state, county, federal, and private transportation activities and programs toward the achievement of statewide objectives;			X
(3) Encourage a reasonable distribution of financial responsibilities for transportation among participating governmental and private parties;			X
(4) Provide for improved accessibility to shipping, docking, and storage facilities;			X
(5) Promote a reasonable level and variety of mass transportation services that adequately meet statewide and community needs;			X
(6) Encourage transportation systems that serve to accommodate present and future development needs of communities;			X
(7) Encourage a variety of carriers to offer increased opportunities and advantages to interisland movement of people and goods;			X

HAWAI'I STATE PLAN, CHAPTER 226, HRS ***(Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)***	C	I	N/A
(8) Increase the capacities of airport and harbor systems and support facilities to effectively accommodate transshipment and storage needs;			X
(9) Encourage the development of transportation systems and programs which would assist statewide economic growth and diversification;			X
(10) Encourage the design and development of transportation systems sensitive to the needs of affected communities and the quality of Hawai'i's natural environment;	X		
(11) Encourage safe and convenient use of low-cost, energy-efficient, non-polluting means of transportation;	X		
(12) Coordinate intergovernmental land use and transportation planning activities to ensure the timely delivery of supporting transportation infrastructure in order to accommodate planned growth objectives; and	X		
(13) Encourage diversification of transportation modes and infrastructure to promote alternate fuels and energy efficiency.			X
Discussion: Although the Proposed Action is not a transportation improvement, all three development scenarios include a BWS office building and parking structure(s) as part of the project. One of the development scenarios includes a parking structure as the primary use. The project's impact on existing transportation infrastructure, including pedestrian connections, is discussed in Section 4.10, Roadways and Transportation			
HRS § 226-18: Objectives and policies for facility systems—energy.			
(a) Objectives: Planning for the State's facility systems with regard to energy shall be directed toward the achievement of the following objectives, giving due consideration to all:			
(1) Dependable, efficient, and economical statewide energy systems capable of supporting the needs of the people;	X		
(2) Increased energy security and self-sufficiency through the reduction and ultimate elimination of Hawaii's dependence on imported fuels for electrical generation and ground transportation;			X
(3) Greater diversification of energy generation in the face of threats to Hawaii's energy supplies and systems;			X
(4) Reduction, avoidance, or sequestration of greenhouse gas emissions from energy supply and use.			X
(5) Utility models that make the social and financial interests of Hawaii's utility customers a priority.	X		
(b) To achieve the energy objectives, it shall be the policy of this State to ensure the short- and long-term provision of adequate, reasonably priced, and dependable energy services to accommodate demand.			X
(c) Other Policies:			
(1) Support research and development as well as promote the use of renewable energy sources;			X
(2) Ensure that the combination of energy supplies and energy-saving systems is sufficient to support the demands of growth;			X
(3) Base decisions of least-cost supply-side and demand-side energy resource options on a comparison of their total costs and benefits when a least-cost is determined by a reasonably comprehensive, quantitative, and qualitative accounting of their long-term, direct and indirect economic, environmental, social, cultural, and public health costs and benefits;			X
(4) Promote all cost-effective conservation of power and fuel supplies through measures including: (A) Development of cost-effective demand-side management programs; (B) Education; and (C) Adoption of energy-efficient practices and technologies;	X		

HAWAI'I STATE PLAN, CHAPTER 226, HRS ***(Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)***	C	I	N/A
(5) Ensure, to the extent that new supply-side resources are needed, that the development or expansion of energy systems uses the least-cost energy supply option and maximizes efficient technologies;	X		
(6) Support research, development, demonstration, and use of energy efficiency, load management, and other demand-side management programs, practices, and technologies;			X
(7) Promote alternate fuels and transportation energy efficiency;	X		
(8) Support actions that reduce, avoid, or sequester greenhouse gases in utility, transportation, and industrial sector applications; and	X		
(9) Support actions that reduce, avoid, or sequester Hawai'i's greenhouse gas emissions through agriculture and forestry initiatives.			X
(10) Provide priority handling and processing for all state and county permits required for renewable energy projects; and			X
(11) Ensure that liquefied natural gas is used only as a cost-effective transitional, limited-term replacement of petroleum for electricity generation and does not impede the development and use of other cost-effective renewable energy sources; and			X
(12) Promote the development of indigenous geothermal energy resources that are located on public trust land as an affordable and reliable source of firm power for Hawai'i.			X
Discussion: The redevelopment of the BWS Beretania Complex would be generally consistent with energy objectives and policies. The new BWS office building, assisted care living and affordable senior rentals would all have energy requirements, and the uses can adopt energy efficient practices and technologies. For parking facilities, priority can be given to electric and/or fuel efficient vehicles, carpoolers, etc. (Policies C4, C5, C6 and C7).			
HRS § 226-18.5: Objectives and policies for facility systems—telecommunications.			
(a) Objective: Planning for the State's telecommunications facility systems shall be directed towards the achievement of dependable, efficient, and economical statewide telecommunications systems capable of supporting the needs of the people.			
(b) To achieve the telecommunications objective, it shall be the policy of this State to ensure the provision of adequate, reasonably priced, and dependable telecommunications services to accommodate demand.			
(c) Policies:			
(1) Facilitate research and development of telecommunications systems and resources;			X
(2) Encourage public and private sector efforts to develop means for adequate, ongoing telecommunications planning;			X
(3) Promote efficient management and use of existing telecommunications systems and services; and			X
(4) Facilitate the development of education and training of telecommunications personnel.			X
Discussion: Objectives and policies are not applicable to the BWS Beretania Complex redevelopment.			
HRS § 226-19: Objectives and policies for socio-cultural advancement—housing.			
(a) Objectives: Planning for the State's socio-cultural advancement with regard to housing shall be directed toward the achievement of the following objectives:			
(1) Greater opportunities for Hawai'i's people to secure reasonably priced, safe, sanitary, and livable homes, located in suitable environments that satisfactorily accommodate the needs and desires of families and individuals, through collaboration and cooperation between government and nonprofit and for-profit developers to ensure that more affordable housing is made available to very low-, low- and moderate-income segments of Hawai'i's population.	X		
(2) The orderly development of residential areas sensitive to community needs and other land uses.	X		

HAWAI'I STATE PLAN, CHAPTER 226, HRS ***(Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)***	C	I	N/A
(3) The development and provision of affordable rental housing by the State to meet the housing needs of Hawai'i's people.	X		
(b) Policies:			
(1) Effectively accommodate the housing needs of Hawai'i's people.	X		
(2) Stimulate and promote feasible approaches that increase housing choices for low-income, moderate-income, and gap-group households.	X		
(3) Increase homeownership and rental opportunities and choices in terms of quality, location, cost, densities, style, and size of housing.	X		
(4) Promote appropriate improvement, rehabilitation, and maintenance of existing housing units and residential areas.			X
(5) Promote design and location of housing developments taking into account the physical setting, accessibility to public facilities and services, and other concerns of existing communities and surrounding areas.	X		
(6) Facilitate the use of available vacant, developable, and underutilized urban lands for housing.	X		
(7) Foster a variety of lifestyles traditional to Hawai'i through the design and maintenance of neighborhoods that reflect the culture and values of the community.	X		
(8) Promote research and development of methods to reduce the cost of housing construction in Hawai'i.			X
Discussion: The development of both assisted care living facility and senior rental apartments support the objectives and policies of HRS 226-19. These proposals would expand housing opportunities for the growing older adult population in an existing urban area. The property is well located in proximity to community services, particularly medical services.			
HRS § 226-20: Objectives and policies for socio-cultural advancement—health			
(a) Objectives: Planning for the State's socio-cultural advancement with regard to health shall be directed towards achievement of the following objectives:			
(1) Fulfillment of basic individual health needs of the general public.	X		
(2) Maintenance of sanitary and environmentally healthful conditions in Hawai'i's communities.	X		
(3) Elimination of health disparities by identifying and addressing social determinants of health.	X		
(b) Policies:			
(1) Provide adequate and accessible services and facilities for prevention and treatment of physical and mental health problems, including substance abuse.	X		
(2) Encourage improved cooperation among public and private sectors in the provision of health care to accommodate the total health needs of individuals throughout the State.	X		
(3) Encourage public and private efforts to develop and promote statewide and local strategies to reduce health care and related insurance costs.			X
(4) Foster an awareness of the need for personal health maintenance and preventive health care through education and other measures.	X		
(5) Provide programs, services, and activities that ensure environmentally healthful and sanitary conditions.	X		
(6) Improve the State's capabilities in preventing contamination by pesticides and other potentially hazardous substances through increased coordination, education, monitoring, and enforcement.			X

HAWAI'I STATE PLAN, CHAPTER 226, HRS ***(Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)***	**C**	**I**	**N/A**
(7) Prioritize programs, services, interventions, and activities that address identified social determinants of health to improve native Hawaiian health and well-being consistent with the United States Congress' declaration of policy as codified in title 42 United States Code section 11702, and to reduce health disparities of disproportionately affected demographics, including native Hawaiians, other Pacific Islanders, and Filipinos. The prioritization of affected demographic groups other than native Hawaiians may be reviewed every ten years and revised based on the best available epidemiological and public health data.	X		
Discussion: The development of both assisted care living facility and senior rental apartments support the objectives and policies of HRS 226-20 related to health. Housing is a basic human need essential to health. The site's proximity to existing medical services could lead to improved coordination in housing and medical care, and improved quality of life for future residents.			
HRS § 226-21: Objective and policies for socio-cultural advancement–education.			
(a) Objectives: Planning for the State's socio-cultural advancement with regard to education shall be directed towards achievement of the objective of the provision of a variety of educational opportunities to enable individuals to fulfill their needs, responsibilities, and aspirations.			
(b) Policies:			
(1) Support educational programs and activities that enhance personal development, physical fitness, recreation, and cultural pursuits of all groups.			X
(2) Ensure the provision of adequate and accessible educational services and facilities that are designed to meet individual and community needs.			X
(3) Provide appropriate educational opportunities for groups with special needs.			X
(4) Promote educational programs which enhance understanding of Hawai'i's cultural heritage.			X
(5) Provide higher educational opportunities that enable Hawai'i's people to adapt to changing employment demands.			X
(6) Assist individuals, especially those experiencing critical employment problems or barriers, or undergoing employment transitions, by providing appropriate employment training programs and other related educational opportunities.			X
(7) Promote programs and activities that facilitate the acquisition of basic skills, such as reading, writing, computing, listening, speaking, and reasoning.			X
(8) Emphasize quality educational programs in Hawai'i's institutions to promote academic excellence.			X
(9) Support research programs and activities that enhance the education programs of the State.			X
Discussion: The objectives and policies related to education are not directly applicable to the proposed redevelopment of the Beretania Complex. No educational uses are envisioned at the site, and future residential uses will not include school aged residents that could impact demand for educational services.			
HRS § 226-22: Objective and policies for socio-cultural advancement–social services.			
(a) Objective: Planning for the State's socio-cultural advancement with regard to social services shall be directed towards the achievement of the objective of improved public and private social services and activities that enable individuals, families, and groups to become more self-reliant and confident to improve their well-being generations.			
(b) Policies:			
(1) Assist individuals, especially those in need of attaining a minimally adequate standard of living and those confronted by social and economic hardship conditions, through social services and activities within the State's fiscal capacities.	X		

HAWAI'I STATE PLAN, CHAPTER 226, HRS ***(Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)***	**C**	**I**	**N/A**
(2) Promote coordination and integrative approaches among public and private agencies and programs to jointly address social problems that will enable individuals, families, and groups to deal effectively with social problems and to enhance their participation in society.	X		
(3) Facilitate the adjustment of new residents, especially recently arrived immigrants, into Hawai'i's communities.			X
(4) Promote alternatives to institutional care in the provision of long-term care for elder and disabled populations.	X		
(5) Support public and private efforts to prevent domestic abuse and child molestation, and assist victims of abuse and neglect.			X
(6) Promote programs which assist people in need of family planning services to enable them to meet their needs.			X
Discussion: The development of assisted care living and affordable senior rentals would be consistent with several of the policies for HRS 226-22, Social services, particularly Policy 4, promoting alternatives to institutional care for elder and disabled populations.			
HRS § 226-23: Objective and policies for socio-cultural advancement—leisure.			
(a) Objective: Planning for the State's socio-cultural advancement with regard to leisure shall be directed towards the achievement of the objective of the adequate provision of resources to accommodate diverse cultural, artistic, and recreational needs for present and future generations.			
(b) Policies:			
(1) Foster and preserve Hawai'i's multi-cultural heritage through supportive cultural, artistic, recreational, and humanities-oriented programs and activities.			X
(2) Provide a wide range of activities and facilities to fulfill the cultural, artistic, and recreational needs of all diverse and special groups effectively and efficiently.			X
(3) Enhance the enjoyment of recreational experiences through safety and security measures, educational opportunities, and improved facility design and maintenance.			X
(4) Promote the recreational and educational potential of natural resources having scenic, open space, cultural, historical, geological, or biological values while ensuring that their inherent values are preserved.			X
(5) Ensure opportunities for everyone to use and enjoy Hawai'i's recreational resources.			X
(6) Assure the availability of sufficient resources to provide for future cultural, artistic, and recreational needs.			X
(7) Provide adequate and accessible physical fitness programs to promote the physical and mental well-being of Hawai'i's people.			X
(8) Increase opportunities for appreciation and participation in the creative arts, including the literary, theatrical, visual, musical, folk, and traditional art forms.			X
(9) Encourage the development of creative expression in the artistic disciplines to enable all segments of Hawai'i's population to participate in the creative arts.			X
(10) Assure adequate access to significant natural and cultural resources in public ownership.			X
Discussion: The objectives and policies related to leisure are not applicable to the proposed redevelopment of the Beretania Complex.			
HRS § 226-24: Objective and policies for socio-cultural advancement—individual rights and personal well-being.			
(a) Objective: Planning for the State's socio-cultural advancement with regard to individual rights and personal well-being shall be directed towards achievement of the objective of increased opportunities and protection of individual rights to enable individuals to fulfill their socio-economic needs and aspirations.			

HAWAI'I STATE PLAN, CHAPTER 226, HRS ***(Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)***	**C**	**I**	**N/A**
(b) Policies:			
(1) Provide effective services and activities that protect individuals from criminal acts and unfair practices and that alleviate the consequences of criminal acts in order to foster a safe and secure environment.			X
(2) Uphold and protect the national and state constitutional rights of every individual.			X
(3) Assure access to, and availability of, legal assistance, consumer protection, and other public services which strive to attain social justice.			X
(4) Ensure equal opportunities for individual participation in society.			X
Discussion: The objectives and policies of HRS 226-24 related to individual rights and personal well-being are not directly applicable to the proposed redevelopment of the Beretania Complex.			
HRS § 226-25: Objective and policies for socio-cultural advancement—culture.			
(a) Objective: Planning for the State's socio-cultural advancement with regard to culture shall be directed toward the achievement of the objective of enhancement of cultural identities, traditions, values, customs, and arts of Hawai'i's people.			
(b) Policies:			
(1) Foster increased knowledge and understanding of Hawai'i's ethnic and cultural heritages and the history of Hawai'i.	X		
(2) Support activities and conditions that promote cultural values, customs, and arts that enrich the lifestyles of Hawai'i's people and which are sensitive and responsive to family and community needs.			X
(3) Encourage increased awareness of the effects of proposed public and private actions on the integrity and quality of cultural and community lifestyles in Hawai'i.			X
(4) Encourage the essence of the aloha spirit in people's daily activities to promote harmonious relationships among Hawai'i's people and visitors.			X
Discussion: The objectives and policies of HRS 226-25 related to culture are not directly applicable to the proposed redevelopment of the Beretania Complex. However, the future development will retain and be compatible with the existing historic structures, fostering knowledge and understanding of history (Policy 1). The developer will be required to comply with the existing Burial Treatment Plan that was developed for an identified site that is within the Project Area.			
HRS § 226-26: Objectives and policies for socio-cultural advancement—public safety.			
Objectives: Planning for the State's socio-cultural advancement with regard to public safety shall be directed towards the achievement of the following objectives:			
(1) Assurance of public safety and adequate protection of life and property for all people.			X
(2) Optimum organizational readiness and capability in all phases of emergency management to maintain the strength, resources, and social and economic well-being of the community in the event of civil disruptions, wars, natural disasters, and other major disturbances.			X
(3) Promotion of a sense of community responsibility for the welfare and safety of Hawai'i's people.			X
(b) Policies related to public safety:			
(1) Ensure that public safety programs are effective and responsive to community needs.			X
(2) Encourage increased community awareness and participation in public safety programs.			X
(c) Policies related to criminal justice:			
(1) Support criminal justice programs aimed at preventing and curtailing criminal activities.			X

HAWAI'I STATE PLAN, CHAPTER 226, HRS ***(Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)***	**C**	**I**	**N/A**
(2) Develop a coordinated, systematic approach to criminal justice administration among all criminal justice agencies.			X
(3) Provide a range of correctional resources which may include facilities and alternatives to traditional incarceration in order to address the varied security needs of the community and successfully reintegrate offenders into the community.			X
(d) Policies related to emergency management:			
(1) Ensure that responsible organizations are in a proper state of readiness to respond to major war-related, natural, or technological disasters and civil disturbances at all times.			X
(2) Enhance the coordination between emergency management programs throughout the State.			X
Discussion: The objectives and policies of HRS 226-26 related to public safety and emergency management are not directly applicable to the proposed redevelopment of the Beretania Complex. However, the future development will be designed to meet public safety and emergency management requirements for the proposed use.			
HRS § 226-27: Objectives and policies for socio-cultural advancement—government.			
(a) Objectives: Planning the State's socio-cultural advancement with regard to government shall be directed towards the achievement of the following objectives:			
(1) Efficient, effective, and responsive government services at all levels in the State.			X
(2) Fiscal integrity, responsibility, and efficiency in the state government and county governments.			X
(b) Policies:			
(1) Provide for necessary public goods and services not assumed by the private sector.			X
(2) Pursue an openness and responsiveness in government that permits the flow of public information, interaction, and response.			X
(3) Minimize the size of government to that necessary to be effective.			X
(4) Stimulate the responsibility in citizens to productively participate in government for a better Hawai'i.			X
(5) Assure that government attitudes, actions, and services are sensitive to community needs and concerns.			X
(6) Provide for a balanced fiscal budget.			X
(7) Improve the fiscal budgeting and management system of the State.			X
(8) Promote the consolidation of state and county governmental functions to increase the effective and efficient delivery of government programs and services and to eliminate duplicative services wherever feasible.			X
Discussion: The objectives and policies of HRS 226-27 relate to government are not directly applicable to the proposed redevelopment of the Beretania Complex. The redevelopment will be undertaken by a private entity and will not affect government operations or functions, although the BWS office building will support BWS operations. However, if a parking structure is developed, it could be targeted for use by government departments and/or employees.			

5.1.4.2 PART II: PLANNING COORDINATION AND IMPLEMENTATION

The purpose of Part II of the Planning Act is to establish a statewide planning system to coordinate and guide all major State and City activities, and to implement the overall theme, goals, objectives, policies, and priority guidelines. These are implemented through State Functional Plans, County General Plans, County Development Plans, and others. City Plans and Policies are described in Section 5.2 of this chapter.

State Functional Plans

The State Functional Plans set the policies, statewide guidelines, and priorities within a specific field of activity. They are intended to guide State and City actions in the areas of agriculture, conservation lands, education, energy, health, higher education, health, historic preservation, housing, recreation, tourism, and transportation.

The Functional Plan most applicable to the Proposed Action is the Housing Functional Plan, updated in February 2017.

Housing Functional Plan

The update of the Housing Functional Plan was coordinated by the Hawaiʻi Housing Finance and Development Corporation and under the guidance of the Office of Planning and the Special Action Team on Affordable Rental Housing, which was established by Act 127, Session Laws of Hawaiʻi 2016. The Housing Functional Plan presents a balanced set of strategies and implementing actions directed toward meeting Hawaiʻi's housing needs.

The Housing Functional Plan identifies several issue areas including rental housing, homeownership, and impediments to residential development. For each of these issue areas, the Plan identifies objectives, policies, and implementing actions. The issue area most applicable to the Proposed Action is Rental Housing, discussed below.

Issue Area: Rental Housing. According to the Housing Functional Plan, Hawaiʻi is faced with a shortage of safe, decent, and affordable rental housing. In 2016, Hawaiʻi ranked #1 in the nation for having the widest gap between wages and the price of rental housing, as documented by the National Low Income Housing Coalition (NLIHC). Wage stagnation, particularly among lower wage earners, rising rents, and an inadequate supply of affordable housing continue to present significant challenges (National Low Income Housing Coalition, Out of Reach 2016).

Pursuant to Act 127, Sessions Laws of Hawaiʻi 2016, a Special Action Team (SAT) on affordable housing was established to make recommendations on actions to promote affordable rental housing statewide. A key goal of Act 127 is to achieve 22,500 affordable rental housing units by December 31, 2026. An implementing action was to support the development of permanent supportive housing for special needs groups, including persons with disabilities, frail elderly, and the chronic homeless.

Discussion: The DEIS evaluates three redevelopment scenarios for the Beretania Complex, one of which is affordable senior rental housing. If senior rental housing is built, approximately 312 rental units could be constructed in a ten-story building. The development of affordable senior rentals conforms to the following objective and strategy policies of the Housing Functional Plan:

Objective A: Increase and sustain the supply of permanent rental housing that is affordable and accessible to Hawai‘i residents, particularly those with incomes at or below 80% AMI.

Attain the legislative goal of 22,500 rental housing units by 2026.

Strategy: Expand and preserve the supply of affordable rental housing through joint public/private efforts.

5.1.4.3 PART III: PRIORITY GUIDELINES

The purpose of Part III, Priority Guidelines, is to establish overall priority guidelines to address areas of statewide concern.

HAWAI‘I STATE PLAN, CHAPTER 226, HRS PART III. PRIORITY GUIDELINES (Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)	C	I	N/A
HRS § 226-101: Purpose. *The purpose of this part is to establish overall priority guidelines to address areas of statewide concern.*			
HRS § 226-102: Overall direction. *The State shall strive to improve the quality of life for Hawai‘i's present and future population through the pursuit of desirable courses of action in five major areas of statewide concern which merit priority attention: economic development, population growth and land resource management, affordable housing, crime and criminal justice, quality education, principles of sustainability, and climate change adaptation.*			
HRS § 226-103: Economic priority guidelines.			
(a) Priority guidelines to stimulate economic growth and encourage business expansion and development to provide needed jobs for Hawai‘i's people and achieve a stable and diversified economy:			
(1) Seek a variety of means to increase the availability of investment capital for new and expanding enterprises.			X
(A) Encourage investments which:			
(i) Reflect long term commitments to the State;			X
(ii) Rely on economic linkages within the local economy;			X
(iii) Diversify the economy;			X
(iv) Reinvest in the local economy;			X
(v) Are sensitive to community needs and priorities; and			X
(vi) Demonstrate a commitment to provide management opportunities to Hawai‘i residents; and			X
(B) Encourage investments in innovative activities that have a nexus to the State, such as:			
(i) Present or former residents acting as entrepreneurs or principals;			X
(ii) Academic support from an institution of higher education in Hawai‘i;			X
(iii) Investment interest from Hawai‘i residents;			X
(iv) Resources unique to Hawai‘i that are required for innovative activity; and			X
(v) Complementary or supportive industries or government programs or projects.			X
(2) Encourage the expansion of technological research to assist industry development and support the development and commercialization of technological advancements.			X
(3) Improve the quality, accessibility, and range of services provided by government to business, including data and reference services and assistance in complying with governmental regulations.			X

HAWAI'I STATE PLAN, CHAPTER 226, HRS PART III. PRIORITY GUIDELINES (Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)	C	I	N/A
(4) Seek to ensure that state business tax and labor laws and administrative policies are equitable, rational, and predictable.			X
(5) Streamline the processes for building and development permit and review and telecommunication infrastructure installation approval and eliminate or consolidate other burdensome or duplicative governmental requirements imposed on business, where scientific evidence indicates that public health, safety, and welfare would not be adversely affected.			X
(6) Encourage the formation of cooperatives and other favorable marketing or distribution arrangements at the regional or local level to assist Hawai'i's small-scale producers, manufacturers, and distributors.			X
(7) Continue to seek legislation to protect Hawai'i from transportation interruptions between Hawai'i and the continental United States.			X
(8) Provide public incentives and encourage private initiative to develop and attract industries which promise long-term growth potentials and which have the following characteristics:			X
(A) An industry that can take advantage of Hawai'i's unique location and available physical and human resources.			X
(B) A clean industry that would have minimal adverse effects on Hawai'i's environment.			X
(C) An industry that is willing to hire and train Hawai'i's people to meet the industry's labor needs at all levels of employment.			X
(D) An industry that would provide reasonable income and steady employment.			X
(9) Support and encourage, through educational and technical assistance programs and other means, expanded opportunities for employee ownership and participation in Hawai'i business.			X
(10) Enhance the quality of Hawai'i's labor force and develop and maintain career opportunities for Hawai'i's people through the following actions:			X
(A) Expand vocational training in diversified agriculture, aquaculture, information industry, and other areas where growth is desired and feasible.			X
(B) Encourage more effective career counseling and guidance in high schools and post-secondary institutions to inform students of present and future career opportunities.			X
(C) Allocate educational resources to career areas where high employment is expected and where growth of new industries is desired.			X
(D) Promote career opportunities in all industries for Hawai'i's people by encouraging firms doing business in the State to hire residents.			X
(E) Promote greater public and private sector cooperation in determining industrial training needs and in developing relevant curricula and on-the-job training opportunities.			X
(F) Provide retraining programs and other support services to assist entry of displaced workers into alternative employment.			X
(b) Priority guidelines to promote the economic health and quality of the visitor industry:			
(1) Promote visitor satisfaction by fostering an environment which enhances the Aloha Spirit and minimizes inconveniences to Hawai'i's residents and visitors.			X
(2) Encourage the development and maintenance of well-designed, adequately serviced hotels and resort destination areas which are sensitive to neighboring communities and activities and which provide for adequate shoreline setbacks and beach access.			X
(3) Support appropriate capital improvements to enhance the quality of existing resort destination visitor facilities.			X

HAWAI'I STATE PLAN, CHAPTER 226, HRS PART III. PRIORITY GUIDELINES (Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)	C	I	N/A
(4) Encourage visitor industry practices and activities which respect, preserve, and enhance Hawai'i's significant natural, scenic, historic, and cultural resources.			X
(5) Develop and maintain career opportunities in the visitor industry for Hawai'i's people, with emphasis on managerial positions.			X
(6) Support and coordinate tourism promotion abroad to enhance Hawai'i's share of existing and potential visitor markets.			X
(7) Maintain and encourage a more favorable resort investment climate consistent with the objectives of this chapter.			X
(8) Support law enforcement activities that provide a safer environment for both visitors and residents alike.			X
(9) Coordinate visitor industry activities and promotions to business visitors through the state network of advanced data communication techniques.			X
(c) Priority guidelines to promote the continued viability of the sugar and pineapple industries:			
(1) Provide adequate agricultural lands to support the economic viability of the sugar and pineapple industries.			X
(2) Continue efforts to maintain federal support to provide stable sugar prices high enough to allow profitable operations in Hawai'i.			X
(3) Support research and development, as appropriate, to improve the quality and production of sugar and pineapple crops.			X
(d) Priority guidelines to promote the growth and development of diversified agriculture and aquaculture:			
(1) Identify, conserve, and protect agricultural and aquacultural lands of importance and initiate affirmative and comprehensive programs to promote economically productive agricultural and aquacultural uses of such lands.			X
(2) Assist in providing adequate, reasonably priced water for agricultural activities.			X
(3) Encourage public and private investment to increase water supply and to improve transmission, storage, and irrigation facilities in support of diversified agriculture and aquaculture.			X
(4) Assist in the formation and operation of production and marketing associations and cooperatives to reduce production and marketing costs.			X
(5) Encourage and assist with the development of a waterborne and airborne freight and cargo system capable of meeting the needs of Hawai'i's agricultural community.			X
(6) Seek favorable freight rates for Hawai'i's agricultural products from interisland and overseas transportation operators.			X
(7) Encourage the development and expansion of agricultural and aquacultural activities which offer long-term economic growth potential and employment opportunities.			X
(8) Continue the development of agricultural parks and other programs to assist small independent farmers in securing agricultural lands and loans.			X
(9) Require agricultural uses in agricultural subdivisions and closely monitor the uses in these subdivisions.			X
(10) Support the continuation of land currently in use for diversified agriculture.			X
(11) Encourage residents and visitors to support Hawai'i's farmers by purchasing locally grown food and food products.			X
(e) Priority guidelines for water use and development:			

HAWAI'I STATE PLAN, CHAPTER 226, HRS PART III. PRIORITY GUIDELINES (Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)	C	I	N/A
(1) Maintain and improve water conservation programs to reduce the overall water consumption rate.			X
(2) Encourage the improvement of irrigation technology and promote the use of nonpotable water for agricultural and landscaping purposes.			X
(3) Increase the support for research and development of economically feasible alternative water sources.			X
(4) Explore alternative funding sources and approaches to support future water development programs and water system improvements.			X
(f) Priority guidelines for energy use and development:			
(1) Encourage the development, demonstration, and commercialization of renewable energy sources.			X
(2) Initiate, maintain, and improve energy conservation programs aimed at reducing energy waste and increasing public awareness of the need to conserve energy.	X		
(3) Provide incentives to encourage the use of energy conserving technology in residential, industrial, and other buildings.			X
(4) Encourage the development and use of energy conserving and cost-efficient transportation systems.			X
(g) Priority guidelines to promote the development of the information industry:			
(1) Establish an information network, with an emphasis on broadband and wireless infrastructure and capability, that will serve as the foundation of and catalyst for overall economic growth and diversification in Hawai'i.			X
(2) Encourage the development of services such as financial data processing, a products and services exchange, foreign language translations, telemarketing, teleconferencing, a twenty-four-hour international stock exchange, international banking, and a Pacific Rim management center.			X
(3) Encourage the development of small businesses in the information field such as software development, the development of new information systems, peripherals, and applications; data conversion and data entry services; and home or cottage services such as computer programming, secretarial, and accounting services.			X
(4) Encourage the development or expansion of educational and training opportunities for residents in the information and telecommunications fields.			X
(5) Encourage research activities, including legal research in the information and telecommunications fields.			X
(6) Support promotional activities to market Hawai'i's information industry services.			X
(7) Encourage the location or co-location of telecommunication or wireless information relay facilities in the community, including public areas, where scientific evidence indicates that the public health, safety, and welfare would not be adversely affected.			X
Discussion: The Beretania Complex redevelopment is not applicable to economic priority guidelines. Although the future uses (BWS office building, assisted care living, affordable senior rental housing) could create some permanent jobs, the uses are not primarily intended to stimulate economic growth.			
HRS § 226-104: Population growth and land resources priority guidelines.			
(a) Priority guidelines to effect desired statewide growth and distribution:			
(1) Encourage planning and resource management to insure that population growth rates throughout the State are consistent with available and planned resource capacities and reflect the needs and desires of Hawai'i's people.	X		

HAWAI'I STATE PLAN, CHAPTER 226, HRS PART III. PRIORITY GUIDELINES (Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)	C	I	N/A
(2) Manage a growth rate for Hawai'i's economy that will parallel future employment needs for Hawai'i's people.			X
(3) Ensure that adequate support services and facilities are provided to accommodate the desired distribution of future growth throughout the State.	X		
(4) Encourage major state and federal investments and services to promote economic development and private investment to the neighbor islands, as appropriate.			X
(5) Explore the possibility of making available urban land, low-interest loans, and housing subsidies to encourage the provision of housing to support selective economic and population growth on the neighbor islands.	X		
(6) Seek federal funds and other funding sources outside the State for research, program development, and training to provide future employment opportunities on the neighbor islands.			X
(7) Support the development of high technology parks on the neighbor islands.			X
(b) Priority guidelines for regional growth distribution and land resource utilization:			
(1) Encourage urban growth primarily to existing urban areas where adequate public facilities are already available or can be provided with reasonable public expenditures, and away from areas where other important benefits are present, such as protection of important agricultural land or preservation of lifestyles.	X		
(2) Make available marginal or nonessential agricultural lands for appropriate urban uses while maintaining agricultural lands of importance in the agricultural district.			X
(3) Restrict development when drafting of water would result in exceeding the sustainable yield or in significantly diminishing the recharge capacity of any groundwater area.	X		
(4) Encourage restriction of new urban development in areas where water is insufficient from any source for both agricultural and domestic use.			X
(5) In order to preserve green belts, give priority to state capital-improvement funds which encourage location of urban development within existing urban areas except where compelling public interest dictates development of a noncontiguous new urban core.			X
(6) Seek participation from the private sector for the cost of building infrastructure and utilities, and maintaining open spaces.			X
(7) Pursue rehabilitation of appropriate urban areas.	X		
(8) Support the redevelopment of Kaka'ako into a viable residential, industrial, and commercial community.			X
(9) Direct future urban development away from critical environmental areas or impose mitigating measures so that negative impacts on the environment would be minimized.	X		
(10) Identify critical environmental areas in Hawai'i to include but not be limited to the following: watershed and recharge areas; wildlife habitats (on land and in the ocean); areas with endangered species of plants and wildlife; natural streams and water bodies; scenic and recreational shoreline resources; open space and natural areas; historic and cultural sites; areas particularly sensitive to reduction in water and air quality; and scenic resources.	X		
(11) Identify all areas where priority should be given to preserving rural character and lifestyle.			X
(12) Utilize Hawai'i's limited land resources wisely, providing adequate land to accommodate projected population and economic growth needs while ensuring the protection of the environment and the availability of the shoreline, conservation lands, and other limited resources for future generations.	X		
(13) Protect and enhance Hawai'i's shoreline, open spaces, and scenic resources.	X		

HAWAI'I STATE PLAN, CHAPTER 226, HRS PART III. PRIORITY GUIDELINES (Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)	C	I	N/A
Discussion: The project site is an existing, underutilized urban site that is adjacent to multifamily residential and medical uses, and currently zoned A-2 Medium Density Apartment. The uses evaluated in the redevelopment scenarios would be compatible with existing BWS operations and adjacent land uses. There are no sensitive environmental areas and utility infrastructure is available.			
HRS § 226-105: Crime and criminal justice.			
Priority guidelines in the area of crime and criminal justice:			
(1) Support law enforcement activities and other criminal justice efforts that are directed to provide a safer environment.			X
(2) Target state and local resources on efforts to reduce the incidence of violent crime and on programs relating to the apprehension and prosecution of repeat offenders.			X
(3) Support community and neighborhood program initiatives that enable residents to assist law enforcement agencies in preventing criminal activities.			X
(4) Reduce overcrowding or substandard conditions in correctional facilities through a comprehensive approach among all criminal justice agencies which may include sentencing law revisions and use of alternative sanctions other than incarceration for persons who pose no danger to their community.			X
(5) Provide a range of appropriate sanctions for juvenile offenders, including community-based programs and other alternative sanctions.			X
(6) Increase public and private efforts to assist witnesses and victims of crimes and to minimize the costs of victimization.			X
Discussion: The priority guidelines for crime and criminal justice are not applicable.			
HRS § 226-106: Affordable housing.			
Priority guidelines for the provision of affordable housing:			
(1) Seek to use marginal or nonessential agricultural land and public land to meet housing needs of low-and moderate-income and gap-group households.	X		
(2) Encourage the use of alternative construction and development methods as a means of reducing production costs.	X		
(3) Improve information and analysis relative to land availability and suitability for housing.	X		
(4) Create incentives for development which would increase home ownership and rental opportunities for Hawai'i's low-and moderate-income households, gap-group households, and residents with special needs.	X		
(5) Encourage continued support for government or private housing programs that provide low interest mortgages to Hawai'i's people for the purchase of initial owner-occupied housing.			X
(6) Encourage public and private sector cooperation in the development of rental housing alternatives.	X		
(7) Encourage improved coordination between various agencies and levels of government to deal with housing policies and regulations.	X		
(8) Give higher priority to the provision of quality housing that is affordable for Hawai'i's residents and less priority to development of housing intended primarily for individuals outside of Hawai'i.	X		
Discussion: If affordable senior rentals or assisted care living is developed, these uses would be compatible with the priority guidelines for affordable housing.			
HRS § 226-107: Quality education.			
Priority guidelines to promote quality education:			

HAWAI'I STATE PLAN, CHAPTER 226, HRS PART III. PRIORITY GUIDELINES (Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)	C	I	N/A
(1) Pursue effective programs which reflect the varied district, school, and student needs to strengthen basic skills achievement;			X
(2) Continue emphasis on general education "core" requirements to provide common background to students and essential support to other university programs;			X
(3) Initiate efforts to improve the quality of education by improving the capabilities of the education work force;			X
(4) Promote increased opportunities for greater autonomy and flexibility of educational institutions in their decision-making responsibilities;			X
(5) Increase and improve the use of information technology in education by the availability of telecommunications equipment for:			X
(A) The electronic exchange of information;			X
(B) Statewide electronic mail; and			X
(C) Access to the Internet.			X
Encourage programs that increase the public's awareness and understanding of the impact of information technologies on our lives;			X
(6) Pursue the establishment of Hawai'i's public and private universities and colleges as research and training centers of the Pacific;			X
(7) Develop resources and programs for early childhood education;			X
(8) Explore alternatives for funding and delivery of educational services to improve the overall quality of education; and			X
9) Strengthen and expand educational programs and services for students with special needs.			X
Discussion: The priority guidelines for quality education are not applicable. None of the potential uses on the site will include school aged children and there will be no impact on existing educational facilities.			
HRS § 226-108: Sustainability.			
Priority guidelines and principles to promote sustainability shall include:			
(1) Encouraging balanced economic, social, community, and environmental priorities;	X		
(2) Encouraging planning that respects and promotes living within the natural resources and limits of the State;	X		
(3) Promoting a diversified and dynamic economy;			X
(4) Encouraging respect for the host culture;	X		
(5) Promoting decisions based on meeting the needs of the present without compromising the needs of future generations	X		
(6) Considering the principles of the ahupua'a system; and			X
(7) Emphasizing that everyone, including individuals, families, communities, businesses, and government, has the responsibility for achieving a sustainable Hawai'i.	X		
Discussion: Future development will incorporate sustainable design and practices.			
HRS § 226-109: Climate change adaptation priority guidelines.			
Priority guidelines to prepare the State to address the impacts of climate change, including impacts to the areas of agriculture; conservation lands; coastal and nearshore marine areas; natural and cultural resources; education; energy; higher education; health; historic preservation; water resources; the built environment, such as housing, recreation, transportation; and the economy shall:			

HAWAI'I STATE PLAN, CHAPTER 226, HRS PART III. PRIORITY GUIDELINES (Key: C = Consistent, I = Inconsistent, N/A = Not Applicable)	C	I	N/A
(1) Ensure that Hawai'i's people are educated, informed, and aware of the impacts climate change may have on their communities;			X
(2) Encourage community stewardship groups and local stakeholders to participate in planning and implementation of climate change policies;			X
(3) Invest in continued monitoring and research of Hawai'i's climate and the impacts of climate change on the State;			X
(4) Consider native Hawaiian traditional knowledge and practices in planning for the impacts of climate change;			X
(5) Encourage the preservation and restoration of natural landscape features, such as coral reefs, beaches and dunes, forests, streams, floodplains, and wetlands, that have the inherent capacity to avoid, minimize, or mitigate the impacts of climate change;			X
(6) Explore adaptation strategies that moderate harm or exploit beneficial opportunities in response to actual or expected climate change impacts to the natural and built environments;			X
(7) Promote sector resilience in areas such as water, roads, airports, and public health, by encouraging the identification of climate change threats, assessment of potential consequences, and evaluation of adaptation options;			X
(8) Foster cross-jurisdictional collaboration between county, state, and federal agencies and partnerships between government and private entities and other nongovernmental entities, including nonprofit entities;			X
(9) Use management and implementation approaches that encourage the continual collection, evaluation, and integration of new information and strategies into new and existing practices, policies, and plans; and			X
(10) Encourage planning and management of the natural and built environments that effectively integrate climate change policy.	X		
Discussion: The redevelopment will incorporate sustainable design and landscaping, and energy saving measures at the site.			

5.1.5 HAWAI'I COASTAL ZONE MANAGEMENT PROGRAM

The federal Coastal Zone Management Act (CZMA) of 1972 was enacted to protect, preserve, develop, restore, and enhance the resources of the nation's coastal zone for current and future generations. The CZMA was adopted in response to competing development and preservation interests in U.S. coastal areas.

Hawai'i's Coastal Zone Management (CZM) program was adopted as Chapter 205A, HRS, and provides a basis for protecting, restoring, and responsibly developing coastal communities and resources. The State's CZM area includes all lands of the State and the area extending seaward of the shoreline. Each county is required to establish special management areas (SMA) and shoreline setbacks within which permits are required for development. The Beretania Complex property is not located within the County's designated SMA or shoreline setback area. The Proposed Action's compliance with CZM program objectives and policies is discussed below:

5.1.5.1 RECREATIONAL RESOURCES

Objective: *Provide coastal recreational opportunities accessible to the public.*

Discussion: The policies supporting this objective pertain mainly to shoreline resources and access. The Project Area is not located near the coast and the Proposed Action has no impact on coastal recreation.

5.1.5.2 HISTORIC RESOURCES

Objective: *Protect, preserve, and, where desirable, restore those natural and manmade historic and prehistoric resources in the coastal zone management area that are significant in Hawaiian and American history and culture.*

Discussion: As discussed in Section 4.4, Archaeological and Cultural Resources, and Section 4.5, Historic Resources, the redevelopment will comply with a burial treatment plan for an existing site, through preservation in place and creation of a buffer zone around the burial. An archaeological inventory survey will be completed based on the proposed redevelopment scenario.

None of the redevelopment scenarios involve alteration to existing historic buildings at the Beretania Complex, although each of the three scenarios could impact the visual setting, i.e., the integrity of setting, feeling and association, particularly as viewed from South Beretania Street. The extent and nature of the impact depends on the selected redevelopment proposal. Appropriate mitigation commitments and mitigation plans will be developed in consultation with the State Historic Preservation Division.

5.1.5.3 SCENIC AND OPEN SPACE RESOURCES

Objective: *Protect, preserve, and, where desirable, restore or improve the quality of coastal scenic and open space resources.*

Discussion: Redevelopment of the Beretania Complex will not impact coastal scenic resources or important view planes The Proposed Action is not in conflict with any Scenic and Open Space policies. However, the construction of several new ten story structures on the property will modify existing views from several nearby apartment buildings. Views looking makai may be partially obstructed and the appearance of the existing ground level parking areas will be transformed by the new structures.

5.1.5.4 COASTAL ECOSYSTEMS

Objective: *Protect valuable coastal ecosystems, including reefs, from disruption and minimize adverse impacts on all coastal ecosystems.*

Discussion: The Project Area is located 1.25 miles from the shoreline and will not have an impact on coastal ecosystems.

5.1.5.5 ECONOMIC USES

Objective: *Provide public or private facilities and improvements important to the State's economy in suitable locations.*

Discussion: The Proposed Action does not involve coastal dependent development and this Economic Uses category is not applicable.

5.1.5.6 COASTAL HAZARDS

Objective: *Reduce hazard to life and property from tsunami, storm waves, stream flooding, erosion, subsidence, and pollution.*

Discussion: The Project Area is not within an identified flood hazard area or area known for subsidence or erosion. It is not within the tsunami evacuation zone. There will be no increase in erosion, subsidence or pollution as a result of the redevelopment.

5.1.5.7 MANAGING DEVELOPMENT

Objective: *Improve the development review process, communication, and public participation in the management of coastal resources and hazards.*

Discussion: The Beretania Complex Redevelopment will not impact coastal resources or hazards. The environmental review process provides government agencies, interested parties, and the general public an opportunity to review and comment on the project through the publication of notice of availability for the EISPN and DEIS.

5.1.5.8 PUBLIC PARTICIPATION

Objective: *Stimulate public awareness, education, and participation in coastal management.*

Discussion: The environmental review process will include opportunities for government agencies and citizens to provide their input on the Proposed Action. BWS has met with the Downtown-Chinatown Neighborhood Board and held a community information meeting on the project. The Proposed Action is not in conflict with any public participation policies.

5.1.5.9 BEACH PROTECTION

Objective: *Protect beaches for public use and recreation.*

Discussion: The Project Area is not located near the shoreline, public beaches or recreation areas. The Proposed Action will not interfere with shoreline access or activities. It is not in conflict with the policies supporting beach protection, which pertain primarily to shoreline development.

5.1.5.10 MARINE RESOURCES

Objective: *Promote the protection, use, and development of marine and coastal resources to assure their sustainability.*

Discussion: The Proposed Action will not increase runoff from the site. The Proposed Action is not in conflict with the policies supporting marine resources.

5.1.6 SUSTAINABILITY

Pursuant to Act 181, Session Laws of Hawaii 2011, the Hawaii State Planning Act provides the policy framework establishing sustainability as a State priority. Under the Act, Sustainability is defined as follows:

- Respect of the culture, character, beauty, and history of the State's island communities;

- Striking a balance between economic, social, community, and environmental priorities; and
- Meeting the needs of the present without compromising the ability of future generations to meet their own needs.

Priority guidelines and principles to promote sustainability shall include:

1. Encouraging balanced economic, social, community, and environmental priorities;

2. Encouraging planning that respects and promotes living within the natural resources and limits of the State;

3. Promoting a diversified and dynamic economy;

4. Encouraging respect for the host culture;

5. Promoting decisions based on meeting the needs of the present without compromising the needs of future generations;

6. Considering the principles of the *ahupuaʻa* system; and

7. Emphasizing that everyone, including individuals, families, communities, businesses, and government, has the responsibility for achieving a sustainable Hawaii.

The State Office of Planning is developing a statewide sustainability planning and coordination program pursuant to these priority guidelines and principles. The development of this program began in June 2017, to liaise among State and other government agencies, private and non-profit organizations on sustainability initiatives statewide.

Future sustainability coordination will include, but are not limited to assessments of Hawaiʻi's infrastructure, water security planning and strategies, sustainable land use recommendations, and other local food security planning and strategies (Office of the Auditor, 2018).

Discussion: The primary purpose of the Proposed Action, the redevelopment of a portion of the Beretania Complex through lease agreement, is to provide a revenue stream for BWS. A reliable revenue stream will help offset a portion of BWS operating costs and capital improvement costs. This will help the agency meet its primary mission to provide Oʻahu water users with a safe, dependable and affordable drinking water supply now and into the future. This is a foundation of Hawaiʻi's sustainability.

All of the potential land uses at the site (BWS office building, parking garage, assisted care facility and affordable senior rentals) are compatible with the sustainability guidelines and principles listed above, and are consistent with the City's land use plans and policies.

5.2 City and County of Honolulu

5.2.1 GENERAL PLAN

The General Plan for the City and County of Honolulu (Amended October 3, 2002) is the culmination of a comprehensive planning process that includes various physical, social, cultural, economic and environmental concerns that affect the island and is intended to guide future growth

and development on O‘ahu. The General Plan sets forth the long-range objectives for the general welfare and prosperity for the people of O‘ahu, as well as broad policies, which facilitate the attainment of these objectives.

The General Plan includes 11 subject areas that form the foundation for the objectives and policies that are covered by the Plan. A description of the subject areas and the applicable objectives and policies are summarized below along with a discussion of their relationship to the Proposed Action.

5.2.1.1 POPULATION

The population objectives and policies focus on three primary areas: (1) control population growth to the extent possible to avoid social, economic, and environmental disruptions; (2) plan for anticipated future population growth; and (3) maintain a pattern of population distribution that will allow people to live and work in harmony.

Discussion: The redevelopment of the Beretania Complex represents infill development on centrally located but underutilized parcels. Demographic trends for O‘ahu show a continued aging of the population, with a higher percentage of elderly residents and an urgent need for appropriate and affordable housing. Two of the potential uses of the site, assisted care living and affordable senior apartments, respond to this urgent need to house the growing senior population on O‘ahu. The Project Area’s location in the urban core and in proximity to existing medical and support services represents efficient land use and minimizes impacts to transportation infrastructure.

5.2.1.2 ECONOMIC ACTIVITY

The objectives and policies for economic activity attempt to address the needs for an adequate standard of living for residents and future generations. Issues of employment opportunities, viability of major industries, diversification of the economic base, and the location of jobs are addressed in terms of what the City can do to provide, encourage, and promote economic opportunities for our people.

Discussion. The Proposed Action will not have a direct, long-term impact on O‘ahu employment, business activity or the visitor industry. None of the proposed redevelopment scenarios will substantially affect the State or City’s economic activity.

However, the redevelopment will generate short-term construction related employment and have a positive fiscal impact. If a parking garage is constructed it will support surrounding businesses, particularly the surrounding medical and government offices and functions of the Hawai‘i Capital District. If a new assisted care living facility is constructed, it would have positive fiscal impacts through permanent job creation and the facility’s ongoing purchase of food, supplies and other services.

5.2.1.3 NATURAL ENVIRONMENT

This objective is to protect and preserve the natural environment, with policies to protect and enhance O‘ahu’s natural attributes by increasing public awareness and appreciation of those attributes and by mitigating against their degradation. Policies address protecting the natural environment from damaging levels of air, water and noise pollution. Another objective is to preserve and enhance the natural monuments and scenic views of O‘ahu for the benefit of both residents and visitors.

Discussion. The Beretania Complex is a developed site which has been in urban use for many years. The Project Area is completely paved and used actively for parking, and there are no significant natural resources. However, the site is within the Hawaiʻi Capital Special District and adjacent to the Punchbowl Special District, both of which have important historic elements and protected views and view planes. The future redevelopment will meet the height and open space requirements of the Hawaiʻi Capital Special District and will not impact views to or from Punchbowl.

5.2.1.4 HOUSING

Obtaining decent, reasonably priced homes in safe and attractive neighborhoods has been a perennial problem for the residents of Oʻahu and is a primary concern of the General Plan. The objectives and policies for housing seek to provide a choice of living environments, affordable housing, and a reduction of inflationary speculation.

Discussion. The existing A-2 Medium Density Apartment zoning makes it likely that there will be some type of residential use. The market study conducted for the redevelopment identified assisted care living and affordable senior apartments as potential uses, and either would support the General Plan's housing objectives and policies. The Project Area is well located in the urban core and adjacent to both multi-family residential and medical support facilities. The Project Area is also convenient to public facilities, recreation, places of employment and commercial areas.

5.2.1.5 TRANSPORTATION AND UTILITIES

An efficient transportation system is essential to the life and economic productivity of a community. The transportation objectives and policies address the need for a balanced system for the pedestrian, bikeway, public transportation, and the automobile. Transportation services to people with limited mobility, i.e., the young, the elderly, the handicapped and the poor, are important. Population growth results in increased demands for water, sewage collection and disposal, and solid waste disposal services provided by government, as well as the communication, electricity, and gas systems provided by the private sector. Not only must such needs be met, but the social, economic, and environmental consequences of meeting these needs must also be carefully considered.

Discussion. The Beretania Complex has good access to major roadways, freeways, and public transportation. The area surrounding the Beretania Complex includes wide and well-maintained sidewalks and pedestrian walkways, providing future residents with non-vehicular transportation options to nearby medical and commercial services and to downtown Honolulu. One of the redevelopment options is a parking structure, which could serve the surrounding government offices and businesses. The Beretania Complex has all necessary utilities (water, sewer, electrical), and no major off-site utility improvements will be required.

The leasing of the Project Area will not disrupt existing BWS operational and administrative facilities and is intended to provide a revenue stream to BWS. The revenue stream will help support BWS operating and capital improvement costs, which will help BWS maintain a high level of water service for Oʻahu.

5.2.1.6 ENERGY

Energy objectives include maintaining an adequate, dependable and economical supply for Oʻahu residents, and energy conservation through more efficient management. Another objective is to fully utilize proven alternative sources of energy.

Discussion. The Proposed Action has no effect on the ability to maintaining an adequate, dependable and economical supply of energy. However, the future land use could support the efficient use of energy and alternative sources of energy. Structures could include photovoltaic (PV) panels. A future assisted care living or senior apartment building, and BWS office building could incorporate energy efficient design, appliances and equipment. A future parking garage could include electrical vehicle recharging stations as well as provide parking incentives for carpooling. By providing housing in an existing urban area, which is close to support services, transportation times for residents and the associated use of fossil fuels will be reduced.

5.2.1.7 PHYSICAL DEVELOPMENT AND URBAN DESIGN

Physical development and urban design is concerned with the quality of growth that occurs within the various parts of the Island. Objectives and policies deal with the coordination of public facilities and land development, compatibility of land uses, and specification of certain land uses at particular locations. Policies give first priority to development in the primary urban center, calling for more compact development and intensive use of urban lands. Mixed use and the development of attractive residential communities in downtown Honolulu are encouraged. The continued viability of the Hawaiʻi Capital District as a center of government activities and as attractive park-like setting in the heart of the City are policy goals.

Discussion. Redevelopment of the Beretania Complex is consistent with the objectives and policies for physical development and urban design. The Project Area is located within the PUC and involves more intensive use of a centrally located site. Residential use in this A-2, Medium Density Apartment zoned area, is a likely use, as well as parking and BWS offices. This directly supports the objective of "mixed use in downtown Honolulu and the development of attractive residential communities in downtown." All of the redevelopment options are compatible with the viability of the Hawaiʻi Capital District.

5.2.1.8 PUBLIC SAFETY

Many of the City's services derive from the concern for the safety of the people. The prevention and control of crime and maintenance of public order are one aspect of public safety. The City's policies reflect the roles citizens, HPD and the City Prosecutor in providing for the safety of residents and visitors. Another aspect of public safety deals with the protection of people and property from natural disasters and other emergencies, traffic and fire hazards, and other unsafe conditions.

Discussion. The redevelopment will not increase the service area limits for police and fire protection services or place undue demands on their capabilities. The Project Area is not in an area that is highly susceptible to natural hazards. Structures will be designed to meet all fire and safety requirements and traffic improvements will be included to reduce hazardous traffic conditions.

5.2.1.9 HEALTH AND EDUCATION

The provision of health care services for the individuals on Oʻahu is largely a function of the private sector. The City's concern concentrates on the accessibility of health facilities through planning and land use controls, and on the protection of environmental health through health codes and other regulations, which mitigate against disease and pollution. Objectives and policies for education call for a wide range of educational opportunities, development of employable skills, efficient use of facilities, appropriate location, and the promotion of Honolulu as a center for higher education in the Pacific.

Discussion. The Proposed Action will not increase the service area limits for emergency medical services or significantly impact the provision of emergency medical services. The Project Area's proximity to the Queen's Medical Center provides an opportunity for synergy between these medical and health care facilities and any future use of the site—whether it be assisted care living, affordable senior rentals, or a parking structure.

5.2.1.10 CULTURE AND RECREATION

Preservation and enhancement of Hawaiʻi's multi-ethnic culture will be achieved through policies directed toward people, and cultural, historic and archaeological sites, buildings, and artifacts. The use of leisure time is addressed through objectives and policies encouraging visual and performing arts and the provision of a wide range of recreational facilities and services that are readily available to all residents.

Discussion. The redevelopment will be required to comply with the Burial Treatment Plan for a previously identified burial site and will conduct a supplemental Archaeological Inventory Survey and archaeological monitoring during construction. Prior to the start of construction, the State Historic Preservation Division will be consulted to develop appropriate mitigation for impacts to existing historic buildings at the Beretania Complex.

5.2.1.11 GOVERNMENT OPERATIONS AND FISCAL MANAGEMENT

Increased efficiency, effectiveness, responsiveness, and fiscal integrity in carrying out the functions of City government are key elements of this subject area.

Discussion. The Proposed Project does not involve government operations and fiscal management.

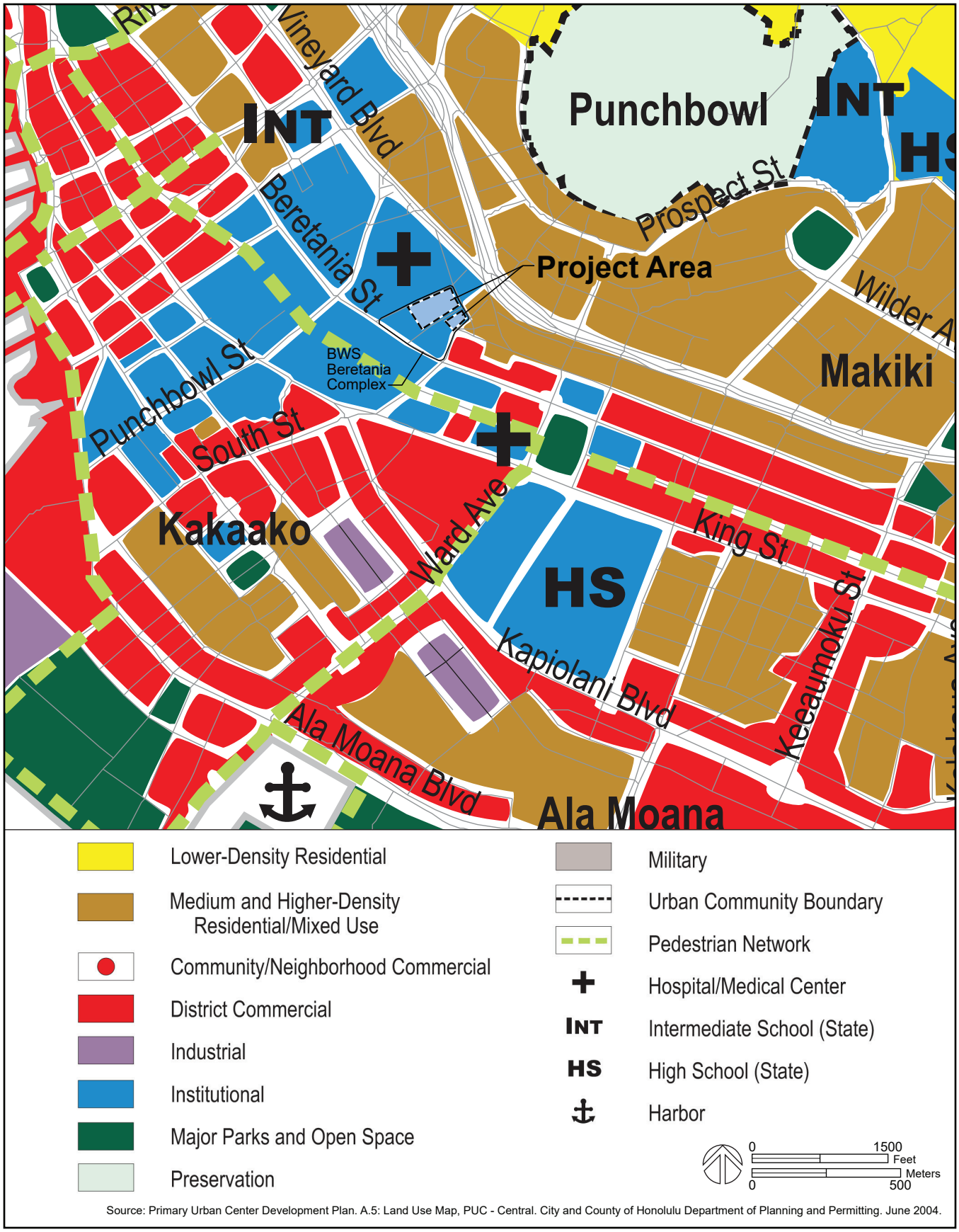
5.2.2 PRIMARY URBAN CENTER (PUC) DEVELOPMENT PLAN

The City prepares and updates eight Development Plans (DP) and Sustainable Communities plans (SCPs) for the island of Oʻahu. Each plan corresponds to a geographic area and serves as a guide for projected growth and future development. The DP's/SCPs are required by City Charter and are adopted by City Council Ordinance. The purpose of the DPs is to implement the comprehensive vision of the General Plan through policies and guidelines reflecting the unique conditions, geography and concerns of each geographic area.

The Beretania Complex is located in the Primary Urban Center (PUC) DP area, which extends from Kāhala to Pearl City. The County General Plan calls for the PUC to absorb the majority of projected population growth for Oʻahu. The last approved PUC DP was adopted in June 2004. DPs are reviewed by the Department of Planning and Permitting (DPP) five years after adoption to

revalidate the findings and conclusions. The review of the PUC DP is currently underway and will incorporate updated demographic information and other recent planning initiatives. Until a new PUC DP is adopted, the 2004 DP remains the guiding document and is discussed here.

Figure 5-2 shows the PUC Development Plan Land Use Plan, which designates the entire Beretania Complex, including the Project Area, as an Institutional Use. Much of the surrounding area, which includes the Queen's Medical Center, the Hawaiʻi State Capitol and Frank F. Fasi Municipal Building, government offices and schools, are designated for Institutional Use.



Source: Primary Urban Center Development Plan. A.5: Land Use Map, PUC - Central. City and County of Honolulu Department of Planning and Permitting. June 2004.

Primary Urban Center Development Plan **Figure 5-2**

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5.2.2.1 VISION

The vision of the 2004 PUC DP includes the following elements:

- Protect and enhance Honolulu's natural, cultural, and scenic resources.
- Create livable neighborhoods with business centers, parks, plazas, and walkable streets.
- Provide in-town housing choices for people of all ages and incomes.
- Make Honolulu the Pacific's leading city and travel destination.
- Create a balanced transportation system that provides excellent mobility for residents and visitors.

Each of these vision elements, objectives and policies is discussed below, as well as the relationship of the Proposed Action to each element.

Honolulu's Natural, Cultural and Scenic Resources are Protected and Enhanced

Natural, cultural and scenic resources provide the context for the PUC and provide its unique identity. Policies to protect and enhance these resources include preserving historic and cultural sites, natural resources, panoramic views of natural landmarks, and the urban skyline; improving access to shoreline and mountain areas; and providing parks, active recreation areas and greenbelts.

Discussion: As discussed previously in Section 4.4, Archaeological and Cultural Resources, and Section 4.5, Historic Resources, the redevelopment will protect existing historic and cultural sites. There will be a no impacts to views of Punchbowl or from the Punchbowl Lookout, and no impact to the park-like setting of the Hawaiʻi Capital Special District. There will be a visual impact from South Beretania Street looking toward the site due to the construction of the ten-story parking garage. There will also be an impact to makai views from office and apartment buildings on and near Lusitana Street. Visual impacts were discussed in Section 4.5 and 4.6.

Livable Neighborhoods Have Business Districts, Parks and Plazas, Walkable Streets

This PUC DP objective and vision involves neighborhoods where people live, work and play. Neighborhoods should include business and community services and be comfortable, convenient and attractive. In-town residential neighborhoods, consisting mostly of apartment dwellings, offer the greatest amenities for urban living and are closest to employment centers, universities and cultural institutions, grocery stores, commercial areas, and health and public services.

Discussion: The DEIS evaluates two potential development options for the Beretania Complex that include specialized residential use targeted at the older adult population. The Project Area's central location, close to commercial, government, cultural and particularly medical services, is compatible with the PUC DP vision for livable and walkable neighborhoods.

The PUC Offers In-Town Housing Choices for People of all Ages and Incomes

This element notes that more households are attracted to in-town residential neighborhoods due to the convenience and amenities of an urban lifestyle. They include a growing number of older adults moving to smaller quarters but wanting to remain near their home neighborhoods. This vision emphasizes the need to provide residential choices for in-town (urban) living that are affordable and meet the lifestyle needs and preferences of different population groups. Supporting policies include promoting people-scaled apartment and townhouse dwellings; promoting affordable housing choices; and preserving and expanding the current inventory of affordable rental housing.

Discussion: The market study for the Beretania Complex Redevelopment identified two residential options that could be developed under the existing zoning: assisted care living and affordable senior rentals. Either of these uses would provide additional housing choices for the older adult population, a demographic that is rapidly increasing on Oʻahu. The site's location in the urban core also supports this DP objective, providing housing that is convenient to community services and amenities. Redevelopment of the Beretania Complex would convert an underutilized parking lot into a new residential area.

Honolulu is the Pacific's Leading City and Travel Destination

The PUC DP recognizes the PUC is the economic center of both Oʻahu and the State, and envisions Honolulu to be the "Pacific's leading city and travel destination." The DP identifies desirable improvements in specific areas of the PUC, including creating public open space along the Pearl Harbor waterfront; developing the Downtown/Iwilei waterfront; developing a plan for a vibrant and livable Waikīkī; supporting attractions of interest in the Ala Moana/Kakaʻako/Downtown corridor; enhancing Honolulu Harbor; and supporting industrial uses in Kalihi-Palama industrial districts. The policies also include encouraging the full use of existing private and public parking garages.

Discussion: The Proposed Action will not impact the specific geographic areas identified for attention and support. However, the development of residential use at the site diversifies the land use mix of the downtown Honolulu area.

The DP policy associated with this element encouraging private parking garage owners to rent underused parking stalls within commercial buildings and large-scale residential projects presumably seeks to optimize use of the PUC's parking assets. The market study for the Beretania Complex Redevelopment indicated that there is a demand for additional parking in the project vicinity. A multi-story parking structure was identified as a non-residential use that would be allowed under the existing A-2 zoning, and one of the redevelopment options.

A Balanced Transportation System Provides Mobility

The DP notes that a pleasant and efficient balance of travel choices that provide timely and convenient access is essential to protect the PUC's natural assets, enhance community livability, and support a world-class city. Stated policies include improving public transit, including a rapid transit component; implementing Transportation Demand Management (TDM) strategies that encourage alternative travel modes; implementing the Honolulu Bicycle Master Plan; enhancing pedestrian mobility; and encouraging the full use of existing private and public parking garages.

Discussion: The Proposed Action will have no impact on the existing or proposed public transportation system. However, the Project Area is in a location that allows future residents or employees to take advantage of alternative travel modes, including bus, bicycles, walking, or the City's future rail system. A traffic impact report (TIR) examined the impacts of the three potential redevelopment scenarios. The TIR is included as Appendix I and traffic is discussed in Section 4.10. The TIR included recommendations to be incorporated into the final project design.

5.2.2.2 PUBLIC INFRASTRUCTURE MAP (PIM)

In a memorandum dated August 9, 2018 to the Board of Water Supply (Subject: Board of Water Supply FY 2018-2019 Capital Improvement Program Budget), the City Department of Planning and Permitting stated the following:

Beretania Complex Office Building and Parking Structure. This project will need a Government Building Modification PIM symbol before it proceeds to its construction phase. It will replace an existing parking lot in the northeast corner of your downtown headquarters with a significant multi-story structure, located near several multi-story buildings. Thus, it will not quality as a minor modification to your existing facilities. Instead, it is expected to trigger one of the three Applicability Criteria under Section 4-8.4 of the PIM Ordinance, which states that any city construction project that is a type of project listed in the Ordinance will require a PIM symbol if "It has a significant impact on surrounding land uses or the natural environment."

5.2.3 ZONING

The Land Use Ordinance (LUO), Chapter 21, Revised Ordinances of Honolulu (ROH) as amended, is the collective zoning code for the City. It establishes the various zoning districts within the City and provides appropriate uses and development standards within each district. The Beretania Complex is within the A-2, Medium Density Apartment zoning district, as shown in Figure 5-3.

The LUO is used to "*regulate land use in a manner that will encourage orderly development in accordance with adopted land use polices, including the O'ahu general plan and development plans and to promote and protect the public health, safety and welfare.*" The LUO does this by:

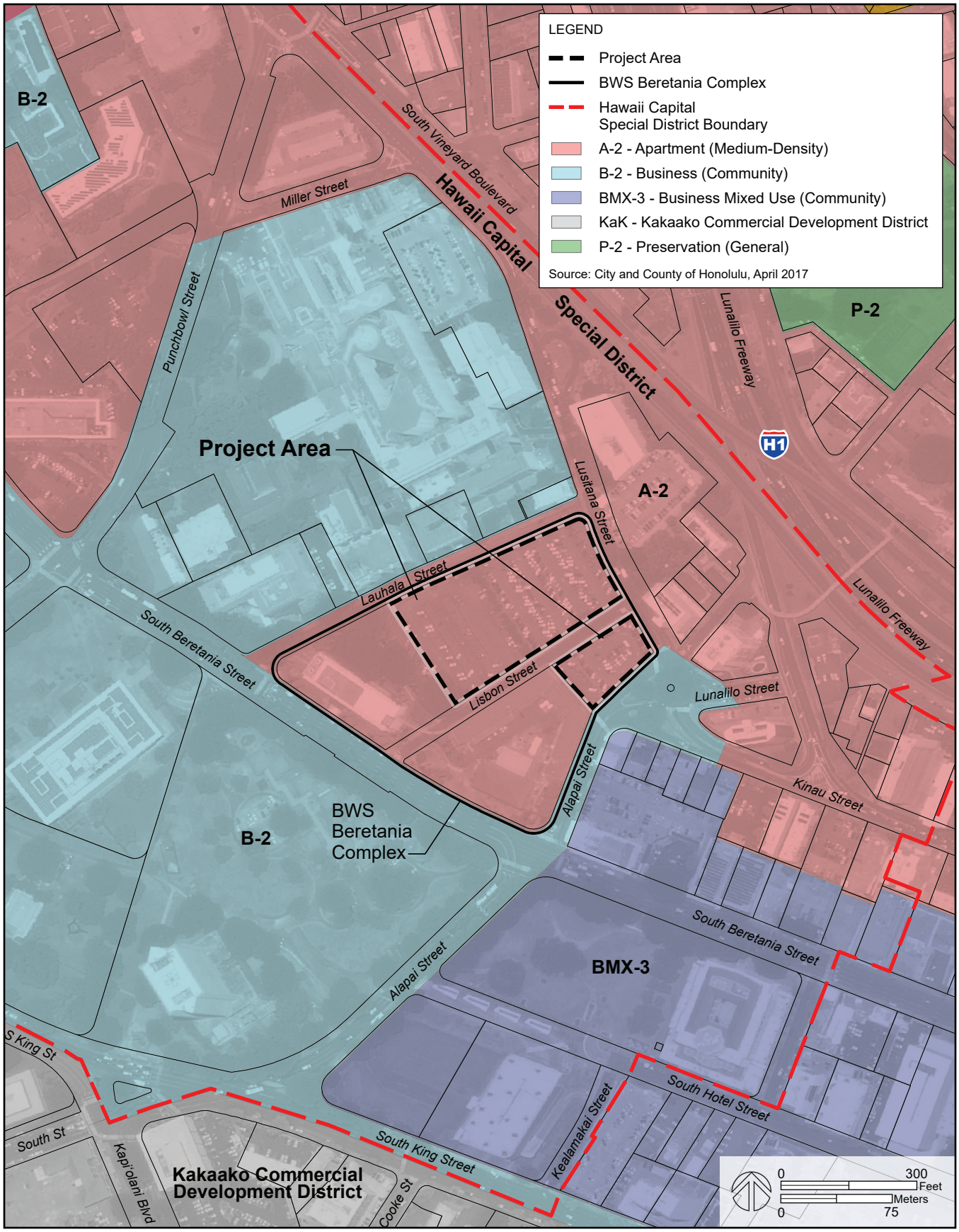
- Minimizing adverse effects resulting from inappropriate location, use or design of sites and structures;
- Conserving the city's natural, historic and scenic resources and encouraging design that enhances the physical form of the city; and
- Assisting the public in identifying and understanding regulations affecting the development and use of land.

According to Section 21-3.80 of the LUO, *"the purpose of the apartment districts is to allow for a range of apartment densities and a variety of living environments. The predominant uses include multifamily dwellings, such as common wall housing, walkup apartments and high-rise apartments. Uses and activities that complement apartment use are permitted, including limited social services…"*

"…The intent of the A-2 medium density apartment district is to provide areas for medium density, multifamily dwellings. It is intended primarily for concentrated urban areas where public services are centrally located and infrastructure capacities are adequate."

Development standards for the A-2 District include:

Development Standard	**A-2 Medium Density Apartment**
Minimum lot area (square feet)	10,000
Minimum lot width and depth (feet)	70
Yards (feet)	Front yard: 10 Side and rear: 10
Maximum building area (lots over 20,000 square feet)	40% of zoning lot
Maximum height (feet)	100 feet



Zoning and Special District Map **Figure 5-3**

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According to the LUO Master Land Use Table (Table 21-3), permissible uses within the A-2 Medium Density Apartment District include the following:

LAND USE	
Commerce and Business	
Home occupations	Ac
Neighborhood grocery stores	Cm
Trade or convention center	PRU
Dwellings and Lodgings	
Boarding facilities	P
Consulates	P
Duplex units	P
Dwellings, detached, one-family	P
Dwellings, detached, two-family	P
Dwellings, multifamily	P
Group living facilities	C
Special needs housing for the elderly	C
Time sharing	P/c
Transient vacation units	P/c
Social and Civic Service	
Day-care facilities	Cm
Hospitals	PRU
Meeting facilities	Cm
Prisons	PRU
Public uses and structures	P
Schools: elementary, intermediate and high	Cm
Schools, language	P/c
Universities, colleges	PRU
Transportation and Parking	
Joint use of parking facilities	Cm
Off-site parking facilities	Cm
Utilities and Communications	
Antennas, receive-only	Ac
Utility installations, Type A	P/c
Utility installations, Type B	Cm

Legend:
Ac = Special accessory use subject to standards in Article 5
Cm = Conditional Use Permit—minor, subject to standards in Article 5; no public hearing required (see Article 2 for exceptions)
C = Conditional Use Permit—major, subject to standards in Article 5; public hearing required
P = Permitted Use
P/c = Permitted use subject to standards in Article 5

Source: City and County of Honolulu, The ROH Online; https://www.honolulu.gov/ocs/roh/193-site-ocs-cat/975-roh-chapter-21.html

Discussion: Three redevelopment scenarios have been identified for the Beretania Complex: assisted care living facility, affordable senior rental apartments, and a stand-alone parking structure. A BWS office building is included in each of these scenarios.

Assisted care living facility would be considered "special needs housing for the elderly" in the LUO Master Land Use Table. This use is allowed in the A-2 Medium Density Apartment zoning district (A-2 zoning) with a Conditional Use Permit (CUP)-Major. Affordable senior rental apartments are a permitted use under the A-2 zoning. Unlike assisted care living, these apartments do not meet the LUO definition of "special needs housing for the elderly," and thus does not require a CUP.

A stand-alone parking structure utilized as an off-site parking facility is permitted in the A-2 zone with a CUP-Minor. The off-site parking structure could be tied directly to specific uses in the neighborhood, either in whole or in part (e.g., Queen's Medical Center, or any of the Physician's Office Buildings). The City and County of Honolulu Police Department has indicated an interest in 500 parking spaces. The BWS office building, which is a part of every development scenario, is considered a public use structure, which is permitted under A-2 zoning.

5.2.4 SPECIAL DISTRICTS

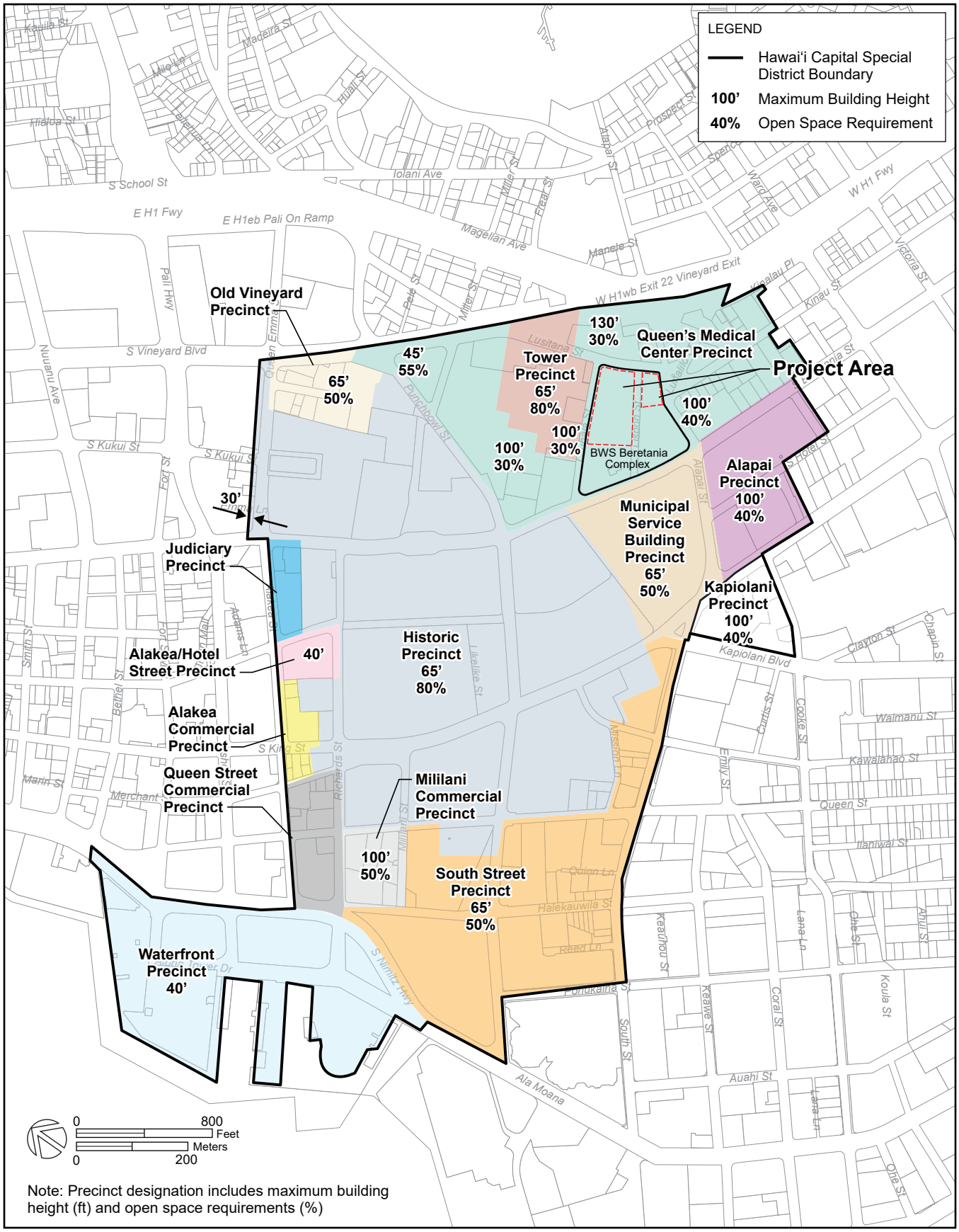
5.2.4.1 HAWAIʻI CAPITAL SPECIAL DISTRICT

The Beretania Complex property is part of the Hawaiʻi Capital Special District, one of eight Oʻahu Special Districts designated by the City. The district is roughly bounded by Honolulu Harbor to the south, Vineyard Boulevard to the north, South, Cooke, and Alapaʻi Streets to the east, and Alakea Street to the west. The district includes ʻIolani Palace, Kawaiahao Church, Honolulu Hale and grounds, and Aloha Tower, as well as pedestrian walkways and landscaped open areas. The extent of the Hawaiʻi Capital Special District is shown in Figure 5-4.

The purpose of a special district is to *"provide a means by which certain areas in the community in need of restoration, preservation, redevelopment or rejuvenation may be designated to guide development to protect and/or enhance the physical and visual aspects of an area for the benefit of the community as a whole."* (LUO, Section 21.9.10, Added by Ord. 99-12). The Hawaiʻi Capital Special District is the civic core of state and Honolulu county government and contains many of Honolulu's landmark buildings.

The Hawaiʻi Capital Special District is divided into multiple precincts, including the Historic Precinct, the Perimeter Precincts, the Queen's Medical Center Precinct and the Tower Precinct. The Project Area is in the Queen's Medical Center Precinct, whose objective is *"to minimize any adverse impact of new medical facilities on the Historic Precinct."* The Queen's Medical Center Precinct has a100-foot height limitation and a 40% open space requirement.

Within the Hawaiʻi Capital Special District, the portion of South Beretania Street fronting the Beretania Complex is designated an important pedestrian and vehicular corridor, and the BWS buildings are listed as contributing to the District. Views to and from Punchbowl from the upper floor of the State Capitol are also to be preserved. Any undertaking within the Hawaiʻi Capital Special District will have to adhere to the above conditions, as well as others set forth by Chapter 21, Article 9.30 of the LUO that details the design requirements within the district.



Hawai'i Capital Special District **Figure 5-4**

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All development in any special district is classified into one of three categories: major, minor, or exempt. Major and minor projects require a Special District permit and will be processed under Sections 21-2.40-2 and 21-2.40-1, respectively. Tables 21-9.1 through 21-9.7 will be used as a guide to determine the category of a particular project within each special district.

(a) Major Permits. These permits are intended for projects that may significantly change the intended character of the Special District. All major permits shall be reviewed by the design advisory committee as specified in Section 21-2.40-2.

(b) Minor Permits. Minor permits are intended for projects that will have limited impact and are considered minor in nature. The director of DPP shall have the right to review and modify such projects.

(c) Exempt Projects. Exempt projects will have negligible or no impact and therefore do not require review. They include projects which require emergency repairs, interior work and do not change the exterior appearance of a structure.

Discussion: Any redevelopment at the Project Area must conform to the Hawaiʻi Capital Special District design requirements, including the 100-foot building height limitation and 40% open space requirement of the Queen's Hospital Precinct. The Special District also includes design controls for landscaping, street trees, roof treatment, architectural components, open spaces, and visual impacts.

None of the three redevelopment scenarios would impact the park-like setting of the Hawaiʻi Capital Special District. The District regulations specifically mention that the view from the Punchbowl lookout is to be protected and enhanced. Section 4.5.2.5 of Chapter 4 included visual simulations of each development alternative as seen from the Punchbowl Lookout. The simulations show that the new buildings would be nearly indistinguishable from the surrounding urban landscape and would only pose a minor change to this protected view.

Redevelopment of the Beretania Complex, however, is considered a major project that also has the potential to significantly change the character of the Special District. As such, a Special District permit (Major) is required.

5.2.4.2 PUNCHBOWL SPECIAL DISTRICT

The Project Area is located outside the boundaries of the Punchbowl Special District, as shown in Figure 5-5. Punchbowl is a volcanic crater and home to the National Memorial Cemetery of the Pacific. The Punchbowl Special District encompasses the National Memorial Cemetery of the Pacific within the crater, as well as portions of several neighborhoods located adjacent to the flanks of the crater. These neighborhoods have a 40-foot height limitation in order to maintain views to and from both the Punchbowl Special District and the Hawaiʻi Capital Special District. These height restrictions do not apply to the Project Area.

Although outside the boundaries of the Punchbowl Special District, the Project Area is within its designated sightlines. The prime objective of the Punchbowl Special District is to protect the Punchbowl monument as a dominant physical form within the island landscape. It calls to "*preserve and enhance significant public views to and from Punchbowl, especially those from the Punchbowl lookouts and long-range views towards Punchbowl, by modifying construction projects that would diminish those views*."

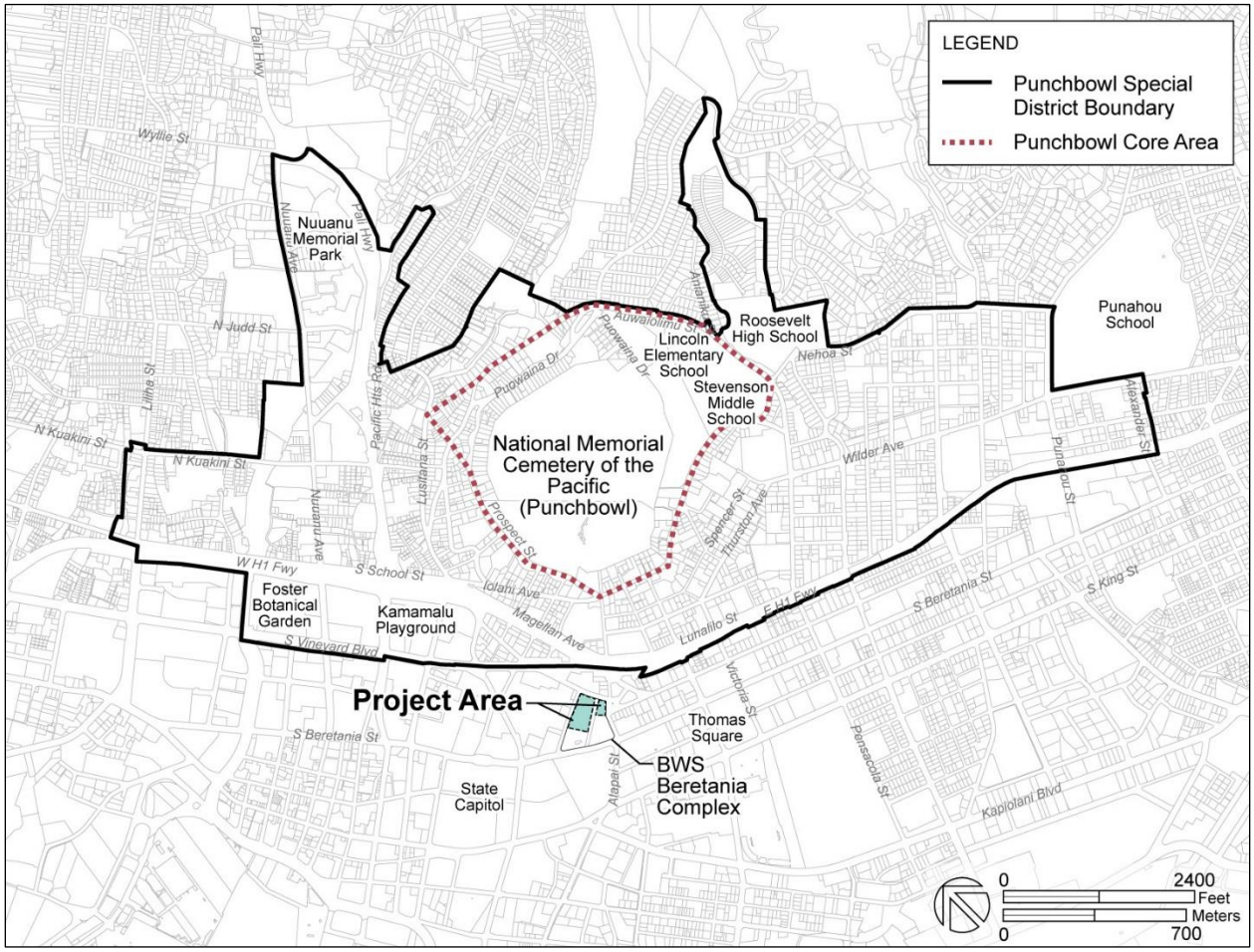

FIGURE 5-5: PUNCHBOWL SPECIAL DISTRICT

Discussion: Both the Hawai'i Capital Special District and the Punchbowl Special District seek to protect the view plane from the Punchbowl Lookout. As shown in the visual simulations in Section 4.5.2.5 of Chapter 4, the visual impacts of the project as seen from the Punchbowl lookout are insignificant.

The construction of new buildings at the Project Area will impact mauka views from South Beretania Street, particularly the view corridor between the Public Service Building and the Engineering Building. As shown in visual simulations in Section 4.5.2.1 of Chapter 4 (Figures 4-5 and 4-6), the ten-story parking structure will dominate the skyline between these buildings, which is presently open with a palm tree backdrop when viewed from South Beretania Street. The slopes of Punchbowl Crater are not visible from this location at present, due to existing urban development.

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6.0 OTHER IMPACTS AND ISSUES

6.1 Relationship Between Short-term Uses of the Environment and the Maintenance and Enhancement of Long-Term Productivity

Short-term uses and long-term productivity weighs the limited, temporary effects of construction activities against the long-term socio-economic benefits of the Proposed Action. During demolition of the existing parking area and construction of new improvements, there will be construction-related impacts including dust generation, construction noise, vehicle and equipment emissions, and traffic disruption in the immediate area. These short-term effects will be mitigated through the implementation of standard best management practices (BMP) for construction activities, as well as mitigation measures prescribed by the State and City. A Traffic Management Plan to address construction period impacts will be prepared and implemented during construction. Measures to mitigate potential impacts to the natural and human made environment can be successfully implemented, as discussed in Chapters 3 and 4.

Short-term fiscal benefits from construction will accrue to the local economy via direct and indirect construction-related employment and direct spending through the purchase of construction materials and building-related services. During construction, there will be direct construction spending and employment opportunities for the local workforce.

The primary, underlying purpose of the Proposed Action is to provide BWS with a steady and predictable revenue stream that will help offset a portion of operating and capital improvement costs. This will support the mission of BWS, sustain its ongoing operations, and enhance its long-term productivity.

The proposed uses of the Project Area will also enhance long term productivity. If assisted care living is constructed, it will provide specialized housing for the growing senior population on Oʻahu. Operation of an assisted care facility will contribute to the local economy through the purchase of goods and services from local businesses and the payment of sales tax. The construction of affordable senior rental housing would meet a growing need for this type of housing. The demand for assisted care living and affordable senior rentals far exceeds existing and currently planned inventory. Because these uses would be targeted at Hawaiʻi residents, most future occupants are already on-island. As such, other than building operation and maintenance, there would not be a significant economic or fiscal impact.

If a parking garage is constructed, it will also meet an existing and projected need. Construction of a new BWS office building is anticipated under any redevelopment scenario and will support BWS operations over the long-term.

Overall, the long-term productivity of the Proposed Action surpasses any short-term effects associated with construction.

6.2 Cumulative and Secondary Impacts

"Cumulative impact" is the impact on the environment, which results from the incremental impact of the proposed action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

"Secondary impact" means an effect that is caused by the action and is later in time or farther removed in distance, but is still reasonably foreseeable.

None of the redevelopment scenarios are expected to have cumulative or secondary impacts on Honolulu's population, although two of the scenarios will increase the resident population of the immediate area. The intended market for both the assisted care living and senior rental apartments is current Hawai'i residents, and the impact of these redevelopment scenarios on public services will be minimal. However, the addition of approximately 266 assisted care living units or 312 senior rental apartments will have a cumulative positive impact on the local housing market, particularly in satisfying the demand for these types of housing products. There will be no cumulative or indirect impact on real estate prices or property tax assessments, which are largely driven by larger market forces.

The redevelopment's positive economic and social benefit will also have a cumulative and indirect impact. Combined with other regional economic growth, the Proposed Action will generate construction-related expenditures, and support short-term construction jobs. Because future residents are currently living on O'ahu, there will be little "new" spending by residents. Indirectly, the associated wages, profits, and expenditures associated with maintaining the new facilities will contribute to the local economy.

The Proposed Action will bring more cars to the immediate area, with some impact on traffic and intersection level of service (LOS). Under all of the scenarios, traffic operations are generally expected to remain similar to conditions without the project.

Because an assisted care living facility or senior rental housing would be targeted at local residents, the majority of future occupants are already living on O'ahu. As such, the net increase in demand for public services islandwide will not be significant. The anticipated fiscal benefits to the City and State will more than off-set the cost of additional public services.

6.3 Irreversible and Irretrievable Commitments of Resources

The issuance of a RFP and a ground lease to redevelop up to 128,100 SF at the Beretania Complex will preclude other uses of the Project Area for the duration of the lease. The Proposed Action will transfer control of the Project Area to a private developer, with BWS having limited input into what is constructed, other than what is included in the lease provisions.

The Project Area will be transformed from a paved parking area to a more intensive use with up to four new buildings up to 100 feet in height. Other resource commitments include labor; development capital; construction materials; nonrenewable electric energy; and nonrenewable resources (fossil fuels, natural gas, metals, and minerals). BWS parking spaces will be replaced in a new high-rise parking structure and existing BWS facilities will remain and operations will continue.

The physical and built environment will be irreversibly modified. The visual landscape will change. Views of the Beretania Complex from surrounding streets will change, particularly views from Lauhala, Lisbon, Lusitana and Alapai Streets. For residents of adjacent apartment buildings, the existing makai views are likely to be impacted. The extent of the impact will vary, depending on the location of the apartment building, the individual apartment unit's orientation, and floor it is located on. The commitment of these resources must be weighed against the economic benefit to BWS, as well as the socio-economic benefit to the community with the construction of assisted care living facility, senior rental apartments, or a parking structure.

6.4 Probable Adverse Environmental Effects That Cannot Be Avoided

Chapters 3 and 4 have addressed the Proposed Action's potential adverse environmental effects that cannot be avoided. There are unavoidable adverse effects associated with construction, both within the Project Area and off-site. These include noise, dust, and temporary traffic congestion. These adverse effects can be minimized or mitigated to levels that are less than significant through construction best management practices and compliance with federal, State and County rules and regulations.

The construction of new buildings at the Beretania Complex was judged to have an adverse effect on existing historic structures, which include the pumping station, Engineering Building and Public Services Building. Although these historic buildings will not be moved or modified, the new buildings will affect the "setting, feeling, and association" as viewed from South Beretania Street. There could also be an adverse effect to the historic underground bomb shelter and tunnel system, depending on the final location and design of new BWS Office Building.

From South Beretania Street, the view corridor between the Public Service Building and Engineering Buildings will be adversely affected by the presence of a 10-story parking garage. The adverse effect will be most pronounced under Scenario 3, which proposes a larger parking garage. In general, visual impacts as a result of the redevelopment will be most obvious when viewed from Lusitana Street, Lauhala Street, and Lisbon Street. Makai-facing views from the surrounding apartment buildings on and around Lusitana Street will be altered and in some cases obstructed, which would be perceived as an adverse effect.

6.5 Unresolved Issues

Although three potential redevelopment scenarios were evaluated, the final use of the Project Area is unknown and unresolved and will be determined by the developer selected via the RFP process. As such, the exact nature and extent of environmental impacts, particularly on archaeological and historic resources and hazardous materials, is currently unknown. Resolution will occur once a specific development is proposed. At that time, further investigation into these issues will be conducted, with the evaluation based on the proposed improvements.

Subsequent studies to be conducted include a supplemental archaeological inventory survey (AIS), consisting of subsurface testing in areas not previously tested by the 2017 BWS AIS. The supplemental AIS will identify the presence or absence of subsurface archaeological resources. The developer will also be required to comply will all provisions of the existing burial treatment plan, which could impact location and design of proposed improvements.

Further evaluation will be needed to assess impacts to historic architectural features and buildings, including the underground bomb shelter and tunnel system. These evaluations must be conducted in consultation with and approved by the State Historic Preservation Division.

The developer will also be required to conduct testing for hazardous materials prior to construction and to remediate and dispose of such materials in accordance with State and federal regulations.

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7.0 EIS PREPARERS AND CONTRIBUTORS

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9.0 PARTIES CONSULTED DURING PREPARATION OF THE EIS

9.1 Agencies, Organizations and Individuals Consulted During the EISPN Process

The Board of Water Supply (BWS) determined at the outset that its proposed Beretania Complex Redevelopment requires the preparation of an environmental impact statement (EIS), based on the significance criteria set forth in Chapter 200, Title 11, State of Hawaiʻi Department of Health.

As such, an Environmental Impact Statement Preparation Notice (EISPN) was prepared in accordance with the requirements of Hawaiʻi Revised Statutes (HRS) §343 and Chapter 200 of Title 11, Hawaiʻi Administrative Rules (HAR). Notice of the EISPN was published in the November 23, 2018 edition of the Office of Environmental Quality Control (OEQC)'s bi-monthly *The Environmental Notice*. The EISPN was available for viewing and download from the OEQC web site, and hard copies were available at the Hawaiʻi State Library (Hawaiʻi Documents Center), DBEDT Research Division Library, University of Hawaiʻi, Thomas H. Hamilton Library, Legislature Reference Bureau Library, and the Honolulu Municipal Reference and Records Management Center. The agencies, groups and individuals listed below were notified in writing of the EISPN.

The 30-day EISPN public comment period ended on December 24, 2018. Parties providing written comments are identified below with an asterisk (*). Copies of comment letters and responses are included at the end of this chapter.

Federal
Department of the Army, Army Corps of Engineers, Honolulu, Regulatory Branch
U.S. Department of Agriculture, Natural Resources Conservation Service
*Department of the Interior, Fish and Wildlife Service, Pacific Islands Fish & Wildlife Office
Department of the Interior, Geological Survey, Pacific Islands Water Science Center
U. S. Environmental Protection Agency, Region 9

State of Hawaiʻi
Department of Agriculture
*Department of Accounting and General Services
Department of Business, Economic Development and Tourism (DBEDT)
*DBEDT Office of Planning
DBEDT Strategic Industries Division
Department of Defense
*Department of Education
*Department of Hawaiian Home Lands
Department of Health
    *Disability and Communication Access Board
Department of Land and Natural Resources (DLNR)
    *Land Division
State Historic Preservation Division
*Department of Transportation (HDOT)
HDOT Statewide Transportation Planning Office
University of Hawaiʻi, Water Resources Research Center

University of Hawai'i, Environmental Center
Office of Hawaiian Affairs

City and County of Honolulu
Department of Design and Construction
Office of Climate Change, Sustainability and Resiliency
Department of Community Services
Honolulu Emergency Services Department
Department of Environmental Services
*Department of Facility Maintenance
*Fire Department
*Department of Land Management
Office of Housing
*Department of Planning and Permitting
*Department of Parks and Recreation
*Police Department
*Department of Transportation Services

Elected Officials
U.S. Senator Brian Schatz
U.S. Senator Mazie Hirono
U.S. Representative Ed Case
U.S. Representative Tulsi Gabbard
U.S. Representative Colleen Hanabusa/U.S. Representative Ed Case
Senator Karl Rhoads, State Senate District 13
Representative Scott Saiki, State House District 26
Mayor Kirk Caldwell
City Council Member Kymberly Marcos Pine, District 1
City Council Member Ernest Y. Martin, District 2
City Council Member Ikaika Anderson, District 3
City Council Member Trevor Ozawa, District 4
City Council Member Ann Kobayashi, District 5
City Council Member Carol Fukunaga, District 6
City Council Member Joey Manahan, District 7
City Council Member Brandon Elefante, District 8
City Council Member Ron Menor, District 9

Utilities/Other
Downtown-Chinatown Neighborhood Board #13
Hawaiian Electric Company
Hawaiian Telcom
Charter Communications
*Historic Hawai'i Foundation
The Queen's Medical Center
Honolulu Star Advertiser
Honolulu Civil Beat

Libraries

Hawaiʻi State Library, Hawaiʻi Documents Center
DBEDT Research Division Library
University of Hawaiʻi, Thomas H. Hamilton Library
Legislature Reference Bureau Library
Department of Customer Service, Municipal Library

BWS Beretania Complex Redevelopment EISPN COMMENTS & RESPONSES				
	Contact	***Comment Ltr. Date***	***Response Ltr. Date***	***Comments***
Federal Agencies				
U.S. Fish and Wildlife Service, Pacific Islands Fish and Wildlife Office (PIFWO)	Aaron Nadig, Island Team Manager, PIFWO	12/4/2018	5/11/2020	• PIFWO currently unable to address your information request. • Attached table with listed protected species most likely to be encountered within Hawaiian Islands, including species most likely to occur within project vicinity. • Projects that are determined to have "no effect" on federally listed species and/or critical habitat do not require additional coordination or consultation. • Implementing the avoidance, minimization or conservation measures for the species that may occur in your project area will normally enable you to make a "may affect, not likely to adversely affect" determination. •
State Agencies				
Accounting and General Services	Dennis Chen, Public Works Division, 586-0491	1/24/2019	5/11/2020	• No comments to offer, project does not appear to directly impact any DAGS managed facilities. • However, we intend to monitor this project given its close proximity to several of our facilities. • We ask to continue to be consulted party for EIS process.
Disability and Communication Access Board	Duane Buote, Facility Access Coordinator, 586-8121	12/20/2018	5/11/2020	• As project is on County lands, it is covered by §103-50 HRS and required to comply with 2010 ADA Standards for Accessible Design. • If project receives federal funds, will have to comply with requirements under Section 504 of the Rehabilitation Act. • Projects with construction documents covered under §103-50 HRS must be submitted to DCAB for formal document review. • Program access obligations must be met under ADA Title II provisions.
Department of Education	Heidi Meeker, Facilities Development Branch (FDB)	11/28/2018	5/11/2020	• FDB is appropriate office to be consulted on the plans prior to release of DEIS • Would like answers to:

BWS Beretania Complex Redevelopment EISPN COMMENTS & RESPONSES				
	Contact	***Comment Ltr. Date***	***Response Ltr. Date***	***Comments***
	Planning Section, 784-5095			• Would school age children be permitted to live in affordable senior rental apartment? • What would happen to senior rental apartments after the 65-year lease has expired? • Complex is within DOE's Kalihi to Ala Moana School Impact Fee District. If senior apartments permit school age children, DOE would collect school impact fees on each unit. • If apartments would not permit children but used by public after initial lease period complete, DOE would want to have educational contribution agreement stating that school impact fees will be paid when children are permitted to live in complex.
Department of Hawaiian Home Lands	Rae Ann Hyatt, 620-9480, raeann.p.hyatt@hawaii.gov	12/11/2018	5/11/2020	• We do not anticipate any impacts to our lands or beneficiaries from the project • We encourage all agencies to consult with Hawaiian Homestead community associations and other native Hawaiian organizations when preparing EAs
Department of Land and Natural Resources, Land Division	Lydia Morikawa, 587-0410	12/20/2018	5/11/2020	<u>Engineering Division</u> • Property owner responsible to research Flood Hazard designation for the project, per FEMA's Flood Insurance Rate Maps <u>Land Division-O'ahu District</u> • No comments
Office of Planning	Joshua Hekekia, 587-2845	12/24/2018	5/11/2020	1. Climate Change • DEIS should evaluate project area's exposure and susceptibility. • If project area at risk, consider adaptation strategies to reduce vulnerability of the built environment and safeguard planned structures from climate change associated hazards. 2. Drainage/Stormwater Runoff Controls, LID • Due to project area's size and potential increase of impervious surfaces, this project may be subject to City Department of Planning and Permitting rules on drainage and onsite stormwater management.

BWS Beretania Complex Redevelopment EISPN COMMENTS & RESPONSES				
	Contact	***Comment Ltr. Date***	***Response Ltr. Date***	***Comments***
				• Contact DPP on LID post construction standards to determine if they pertain to this project. • OP has developed guidance documents on onsite stormwater management. Recommend consulting these evaluative tools when developing mitigation. 3. Hawai'i Coastal Zone Management Program • DEIS should examine project's consistency with Hawai'i CZM program. 4. Hawaii State Planning Act • Concur that DEIS should examine project's relevance with all parts of Hawai'i State Planning Act. (Part I, Part II and Part III). • If any of these provisions are not applicable to this project, analysis should affirmatively state such determination followed by discussion paragraphs. 5. Affordable Senior Rental Housing • Pursuant to Act 127 SLH 2016, a Special Action Team on affordable housing was established to make recommendations on actions to promote affordable rental housing statewide. • Key goal of Act 127 is to achieve 22,500 affordable rental housing units by December 31, 2026. • For the senior housing option, DEIS should identify the number of affordable rental units that may be made available.
Department of Transportation	Blayne Nikaido, Statewide Transportation Planning Office, 831-7979	12/18/2018	5/11/2020	<u>Airports Division</u> • Project is approximately 19,536 feet from end of Runway 26R at Daniel K. Inouye International Airport (HNL). • All projects within 5 miles from Hawai'i airports are advised to read the Technical Assistance Memorandum for guidance with development and activities that may require further review and permits.

BWS Beretania Complex Redevelopment EISPN COMMENTS & RESPONSES				
	Contact	***Comment Ltr. Date***	***Response Ltr. Date***	***Comments***
				• FAA regulations require submittal of FAA Form 7460-1 Notice of Proposed Construction if construction or alteration is within 20,000 feet of public use or military airport. • Photovoltaic (PV) panel installations have potential to create glint and glare hazard conditions for aircraft pilots. If project includes PV installation, recommended to conduct glint and glare analysis. • Large scale solar energy installations have potential to emit RFI. <u>Highways Division</u> • Although proposed development would access roads under City and County of Honolulu jurisdiction, proximity could impact traffic operations to and from Lunalilo Freeway H-1. • Traffic assessment shall be prepared and submitted for our review and acceptance. Assessment should estimate traffic circulation to and from H-1.
City and County of Honolulu				
Department of Facility Maintenance	Kyle Oyasato, Division of Road Maintenance, 768-3697	12/5/2018	5/11/2020	• During construction and completion of project, any damages/deficiencies to Lauhala Street, Alapai Street, Lisbon Street, and Lusitana Street ROW shall be corrected at no cost to City and County.
Fire Department	Battalion Chief Wayne Masuda, Fire prevention Bureau, 723-7151	12/20/2018	5/11/2020	• Fire department access roads and water supply shall be provided. • Unobstructed width and vertical clearance of fire access road shall meet county requirements • Submit civil drawings to HFD for review.
Department of Land Management	Seiji Ogawa	Email dated 12/4/2018	5/11/2020	• Update me when the DEIS is published on OEQC's web site.
Parks and Recreation	John Reid, Planner, 768-3017	11/28/2018	5/11/2020	• DPR has no comment; the project will have no impact on any program of facility of the department.

BWS Beretania Complex Redevelopment EISPN COMMENTS & RESPONSES				
	Contact	***Comment Ltr. Date***	***Response Ltr. Date***	***Comments***
				• You may remove us as a consulted party for the balance of the EIS process.
Department of Planning and Permitting	Joette Yago, Urban Design Branch, 768-8034	12/6/2018	5/11/2020	• Special District Permit (Major) is required. • Conditional Use Permits (Major) required for the assisted care living and senior rental apartments. • Discuss how proposed alternatives will enhance other buildings and landmarks within Hawai‘i Capital Special District and how they'll be compatible with existing BWS buildings and structures • Discuss how proposed or retained landscaping will enhance park-like setting of Hawai‘i Capital Special District including views from Punchbowl Lookout. Discuss and show trees 6 inches or more in caliper to remain/removed/replaced/relocated. • Include discussion of off-street parking and circulation. • Discuss how alternatives will comply with 40% open space requirement. • Discuss current nonconforming joint development agreement and how it will be resolved with proposed alternatives. Include discussion on how number of BWS parking stalls will be maintained during construction. • Describe how alternatives will not visually intrude into Historic Precinct of Capital Special District. • What happened to proposed PV system over existing surface parking previously approved? Will this system be incorporated with this project?
Police Department	Allan T. Nagata, Assistant Chief, Support Services 529-3857	2/7/2019	5/11/2020	• HPD needs additional parking spaces at its Alapa‘i headquarters. HPD requesting 500 parking stalls.
Department of Transportation Services	Renee Yamasaki, 768-8383	12/28/2018	5/11/2020	1. Consult with Queen's Medical Center regarding their long-term redevelopment plans for their facility to assure it's compatible with this project. 2. Transportation Impact Assessment

BWS Beretania Complex Redevelopment EISPN COMMENTS & RESPONSES				
	Contact	***Comment Ltr. Date***	***Response Ltr. Date***	***Comments***
				• A multi-modal TIA should be completed instead of a TIAR 3. Pedestrian and bicycle plan for facility should be provided. 4. Parking and Service Strategy • All parking needs should be handled on-site • Number of parking spaces should be justified and consistent with trip generation method used in the TIA • DTS requires a Shared parking Analysis • Provide a strategy whereby a percentage of parking is separated from lease or purchase transaction to increase housing affordability for households that do not use parking • Recommend project designs that wrap structured parking with residential units to maintain active street frontage. • Vehicle ramps should be designed to accommodate demands to avoid queueing on adjacent roadways. • 5. Traffic Management Plan (TMP) • Discuss traffic impacts on surrounding City roads and facilities, including short term and long-term impacts • TDM strategies to minimize vehicular trips to the site • Transfer construction materials and equipment during off-peak hours • Inform residents, employees, and visitors of City programs to promote alternative modes of transportation. Reserve parking for carpool and vanpool vehicles on-site. • Consider subsidized transit passes to residents and employees. • Best practice TMPs • Coordinate construction schedules with nearby properties 6. Complete Streets—include discussion of Complete Streets policies.

BWS Beretania Complex Redevelopment EISPN COMMENTS & RESPONSES				
	Contact	***Comment Ltr. Date***	***Response Ltr. Date***	***Comments***
				7. Bike and Moped Parking should be included in site plan. 8. Driveway design-access driveways should be designed with highest pedestrian and bicycle safety. 9. Loading and Unloading • Should be handled on site rather than on City roadways. • Should accommodate Hand-Van paratransit on site 10. Priority Guidelines on Sustainability • Project should consider certification by green building rating system. • DTS supports certification such as LEED. 11. Roadway, Sidewalk and Crosswalk Closures. If there are any roadway, sidewalk or crosswalk closures, alternate routes should be provided. 12. Vehicle/Pedestrian Crossing—existing access/crossing should be maintained during construction. 13. BMP Controls should be included at construction site. 14. Roadway Damage—any damage caused by project should be repaired. 15. Neighborhood Impacts—Area representatives, neighborhood board, residents and businesses etc. should be kept apprised of details and status of project and impacts on adjoining streets. 16. Street Usage Permit from DTS should be obtained for work that requires temporary closure of any traffic lane. 17. Disability and Communication Access Board (DCAB) should review and approve project plans to ensure full compliance with ADA.
Other	***Contact***	***Comment Ltr. Date***	***Response Ltr. Date***	***Notes***
Historic Hawai‘i Foundation	Kiersten Faulkner, Executive Director	12/13/2018	5/11/2020	• HHF is pleased to see BWS has reduced project area to portions with surface parking, thus avoiding historic structures on makai portion of property. Agree with

BWS Beretania Complex Redevelopment EISPN COMMENTS & RESPONSES				
	Contact	***Comment Ltr. Date***	***Response Ltr. Date***	***Comments***
				project limits that exclude known historic buildings. • Include the location, condition, and whether the tunnel system is still extant in the assessment of historic resources • HHF recommends conducting, at minimum, reconnaissance level survey to identify probable subsurface cultural resources prior to selecting locations for new buildings • Recommend DEIS technical appendices include Mason Architect's architectural inventory survey of the historic properties for reference. • Existing special district guidance need to be followed. • Additional measures to protect historic resources could include commitments to prepare and follow a preservation plan for the three historic BWS buildings.
David Rezachek (private citizen)	Rezachekd001@hawaii.rr.com	Email 11/14/2018	5/11/2020	• I plan to express strong opposition to all alternative designs. Impacts on area residents will be negative. • Will be encouraging other residents of Lunalilo Tower (710 Lunalilo Street) and neighboring residents to oppose project. • Please place me on distribution list for project.

9.2 Agencies, Organizations and Individuals Consulted During the DEIS Process

A Draft EIS (DEIS) was prepared and notice was published in the May 23, 2020 edition of the OEQC's *The Environmental Notice*. The DEIS was available for viewing and download from the OEQC web site. A hard copy was also sent to the Hawai'i State Library (Hawai'i Documents Center), even though libraries were closed to the public at the time due to the COVID-19 pandemic. Because most government agencies and organizations had shifted to remote operation in response to the pandemic, primary notification of the DEIS was done via email. The agencies, organizations and individuals listed below were notified via email on May 18, 2020 that the DEIS was available on the OEQC web site. The distribution list was reviewed and approved by OEQC.

The 45-day DEIS comment period ended on July 7, 2020. Letters from seven (7) agencies/organizations were received. The distribution list for the DEIS is below, with those providing written comments identified with an asterisk (*). Copies of comment letters and responses are included at the end of this chapter.

Federal
Department of the Army, Army Corps of Engineers, Honolulu, Regulatory Branch
U.S. Department of Agriculture, Natural Resources Conservation Service
Department of Commerce, National Marine Fisheries Service
Department of the Interior, Fish and Wildlife Service, Pacific Islands Fish & Wildlife Office
Department of the Interior, Geological Survey, Pacific Islands Water Science Center
Department of the Interior, National Park Service, Pacific Islands Support Office
U. S. Environmental Protection Agency, Region 9
Department of Transportation, Federal Aviation Administration
Department of Transportation, Federal Transit Administration
Department of Homeland Security, Commander, 14th Coast Guard District

State of Hawai'i
Department of Agriculture
*Department of Accounting and General Services, Public Works Division
Department of Business, Economic Development and Tourism (DBEDT)
DBEDT Office of Planning
DBEDT Strategic Industries Division
Department of Defense, Office of the Adjutant General
Department of Education
Department of Hawaiian Home Lands
Department of Health, Environmental Health Administration
    *Clean Air Branch
Disability and Communication Access Board
Department of Land and Natural Resources (DLNR)
    *Land Division
State Historic Preservation Division
*Department of Transportation (HDOT)
HDOT Statewide Transportation Planning Office
University of Hawai'i, Water Resources Research Center
University of Hawai'i, Environmental Center
Office of Hawaiian Affairs

City and County of Honolulu
*Department of Design and Construction
Office of Climate Change, Sustainability and Resiliency
Department of Community Services
Honolulu Emergency Services Department
Department of Environmental Services
Department of Facility Maintenance
Fire Department
Department of Land Management
Office of Housing
Department of Planning and Permitting
Police Department
Department of Transportation Services

Elected Officials
U.S. Senator Brian Schatz
U.S. Senator Mazie Hirono
U.S. Representative Ed Case
U.S. Representative Tulsi Gabbard
U.S. Representative Colleen Hanabusa/U.S. Representative Ed Case
*Senator Karl Rhoads, State Senate District 13
Representative Scott Saiki, State House District 26
The Honorable Mayor Kirk Caldwell
City Council Member Kymberly Marcos Pine, District 1
City Council Member Heidi Tsuneyoshi, District 2
City Council Member Ikaika Anderson, District 3
City Council Member Tommy Waters, District 4
City Council Member Ann Kobayashi, District 5
City Council Member Carol Fukunaga, District 6
City Council Member Joey Manahan, District 7
City Council Member Brandon Elefante, District 8
City Council Member Ron Menor, District 9

Utilities/Other/Individuals
Downtown-Chinatown Neighborhood Board #13
*Hawaiian Electric Company
Hawaiian Telcom
Charter Communications
*Historic Hawaiʻi Foundation
The Queen's Medical Center
Dr. David Rezachek, P.E.

News Media
Honolulu Star Advertiser
Honolulu Civil Beat
Hawaiʻi Tribune Herald
West Hawaiʻi Today
The Garden Island
Maui News
Molokaʻi Dispatch

Libraries

Hawaiʻi State Library, Hawaiʻi Documents Center
DBEDT Research Division Library
University of Hawaiʻi, Thomas H. Hamilton Library
Legislature Reference Bureau Library
Department of Customer Service, Municipal Library
University of Hawaiʻi at Hilo, Edwin H. Mookini Library
University of Hawaiʻi, Maui College Library
University of Hawaiʻi, Kauaʻi Community College Library

BWS Beretania Complex Redevelopment DEIS COMMENTS & RESPONSES					
	Contact	***Comment Ltr. Date***	***Response Ltr. Date***	***Comments***	***Response***
State of Hawaii					
Accounting and General Services	Dennis Chen, Public Works Division	Ltr dated 6/17/2020	8/4/2020	• Project does not appear to directly impact DAGS-managed facilities. • No comments to offer at this time. • DAGS intends to continue to monitor this project as it develops, given proximity to several of our facilities.	Comments acknowledged.
Department of Health, Clean Air Branch	Barry Ching, Clean Air Branch	Email dated 5/26/2020	8/4/2020	• Please review Clean Air Branch standard comments (link provided)	Comments acknowledged.
Department of Land and Natural Resources, Land Division	Barbara Lee	Ltr dated 7/7/2020	8/4/2020	<u>Engineering Division</u> • No additional comments <u>Land Division</u> • No comments	Comments acknowledged.
Department of Transportation	Blayne Nikaido, Statewide Transportation Planning Office	Ltr dated 7/1/2020. Refer to STP 20-047, STP 8.2948	8/5/2020	<u>Airports Division</u> • BWS has sufficiently addressed HDOT-A's comments previously published in EISPN. No further concerns. <u>Highways Division</u> • Project site is in close proximity to Interstate H-1 Freeway which is under State jurisdiction. Traffic impact Analysis Report should be revised to address whether the project will adversely impact the Interstate H-1 Freeway on- and off-ramps in the area.	Highways Division comments: The Traffic Impact Report shall be updated after a developer is selected and a development plan is finalized to reflect any changes in the project density and to incorporate a more detailed assessment of the project's impact to the State facilities. This will be a requirement of the RFP.
City and County of Honolulu					

BWS Beretania Complex Redevelopment DEIS COMMENTS & RESPONSES					
	Contact	***Comment Ltr. Date***	***Response Ltr. Date***	***Comments***	***Response***
Department of Design and Construction	Mark Yonamine, P.E. Director	Ltr dated 6/19/2020	8/4/2020	• No comments at this time	Comments acknowledged.
Utilities					
Hawaiian Electric Co.	Rouen Liu, Permit Engineer, HECO	Email dated 6/30/2020	8/4/2020	• Should HECO have existing easements and facilities on the properties, will need continued access and proper clearances for maintenance of facilities. • Please continue to keep us informed	Acknowledged that should HECO have existing easements and facilities on the subject property, HECO will need continued access and proper clearances for maintenance. HECO will be kept informed.
Elected Officials					
Senator Karl Rhoads Hawai'i Senate District 13	Senator Karl Rhoads	Ltr dated 7/20/2020	8/31/2020	Primary two concerns are a) the undetermined scope and decision making of the redevelopment and b) the impact of increased vehicle use of the lot. 1. Development flexibility is considerable (because developer not BWS will determine final redevelopment plan and does not preclude rezoning to BMX-3) and does not provide certainty as to actual plans for redevelopment. 2. BWS is envisioning that several hundred additional parking spaces will be created and possibly new assisted living that will increase vehicular traffic. Impact of additional vehicular traffic on surrounding streets including South Beretania Street and the	*(see 8/31/2020 letter at end of this chapter for full response)* Comment 1: The developer, not BWS will decide on the final redevelopment. The 3 options evaluated in DEIS were identified as most likely under A-2 zoning, based on a 2017 Market Assessment. While we cannot provide 100% certainty about all possible futures, existing rules and regulations provide for additional evaluation and review if required, e.g., zone change process will involve public hearing and likely new or supplemental EIS. Even under current A-2 zoning, proposed use significantly different from 3 scenarios may

BWS Beretania Complex Redevelopment DEIS COMMENTS & RESPONSES					
	Contact	***Comment Ltr. Date***	***Response Ltr. Date***	***Comments***	***Response***
				environmental impact to area residents and businesses does not seem to have been sufficiently evaluated in the DEIS. 3. It is puzzling how DEIS could conclude that "long-term air quality impacts are not expected to be significant" while acknowledging increased vehicle emissions due to more vehicular traffic in the area. Other comments concern proposal's lack of commitment to energy efficiency, building design and operation such as use of solar energy (green standards should be part of the RFP and lease), and lack of analysis on how to support and protect non-car modes of transportation to the site, especially for seniors.	require supplemental environmental document or additional analysis. Comment 2: Assisted living and senior rental apartments typically do not require large numbers of parking spaces or generate high traffic volumes. At present, future parking stalls cannot be tied to specific land use, therefore trip generation was estimated based on a methodology using trends and industry standards. Based on distribution of parking occupancy, only a portion of parking garage is assumed to be occupied during the start and end of the day. Trip generation analysis shows that while there will be increase in number of trips along project roadways during morning and afternoon peak periods, increases are not high enough to decrease level of service compared to "without redevelopment" conditions. There will be additional air emissions associated with vehicles and short-term

BWS Beretania Complex Redevelopment DEIS COMMENTS & RESPONSES					
	Contact	***Comment Ltr. Date***	***Response Ltr. Date***	***Comments***	***Response***
					construction, but impacts are not expected to be significant (i.e., air quality will not exceed State or federal standards). Other Comments: BWS is committed to energy efficient design and operation and this will be included in the RFP and lease agreement. RFP will include sustainability requirements for development to achieve LEED certification. Developers must comply with Honolulu Complete Streets policies and will be required to prepare a multi-modal assessment based on final development plan.
Organizations					
Historic Hawai'i Foundation (HHF)	Kiersten Faulkner, Executive Director	Ltr dated 7/7/2020	9/9/2020	*(see 7/7/2020 comment letter from HHF at the end of this chapter)* <u>Project Scope</u> Comment 1: HHF is pleased that BWS restricted project to areas of property covered with surface parking, thus avoiding historic buildings and structures. <u>Identification of Historic & Cultural Resources</u> Comment 2: HHF is concerned that DEIS only addresses the first two steps and does not include	*(see 9/9/2020 response letter at end of this chapter for full response)* Comment 1: Acknowledged. Comment 2: The Historic Resources Evaluation (MASON, July 2019) evaluated the potential effect of each of the three development scenarios (Table 4-8 of the EIS). The table has been updated to reflect the

BWS Beretania Complex Redevelopment DEIS COMMENTS & RESPONSES					
	Contact	***Comment Ltr. Date***	***Response Ltr. Date***	***Comments***	***Response***
				evaluation of potential effect and commitments to appropriate treatment. Instead, BWS proposes to leave those critically important actions to the potential developer. Comment 3: HHF appreciates effort that has identified historic and cultural resources within and adjacent to the Project Area. We agree with the identification of these historic properties. <u>HHF Comments on Effect on Historic and Cultural Resources</u> Comment 4: HHF is extremely concerned that the assessment of effect and commitments to appropriate treatments and mitigation measures are not addressed in the DEIS. Instead, BWS has chosen to delay and delegate responsibility to an unknown future development partner. This lack of clarify and commitment fails to incorporate meaningful preservation measures into the project. Comment 5: HHF strongly recommends that these measures be addressed in the FEIS and implemented via the RFP process, selection of the developer and project design and execution. HHF strongly recommends that the project use, siting, design, and preservation commitments include a	evaluation of potential effect more accurately. See response to Comment 5 below. Comment 3: Acknowledged Comment 4: See Table 4-8 of the EIS and response to Comment 5 below. Comment 5: Prior to issuance of the RFP, BWS will work with historic architect MASON to develop design guidelines that will help avoid, minimize, and mitigate the impacts on historic and cultural resources. The proposed guidelines may include, but shall not be limited to, setbacks, open space requirements, landscape treatments, and exterior finishes and colors of new structures. These guidelines will be incorporated into the RFP and made a requirement of the redevelopment plan.

BWS Beretania Complex Redevelopment DEIS COMMENTS & RESPONSES					
	Contact	***Comment Ltr. Date***	***Response Ltr. Date***	***Comments***	***Response***
				consultation process that includes parties with an interest in the preservation of resources rather than relying solely and exclusively on consultation with SHPD.	

EISPN Comment Letters

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawai‘i 96850

In Reply Refer To:
01EPIF00-2019-TA-0086

December 4, 2018

Mr. Ernest Y.W. Lau, P.E.
Manager and Chief Engineer
Board of Water Supply
City and County of Honolulu
630 South Beretania Street
Honolulu, Hawaii 96843

Subject: Response to your Request for Technical Assistance

Dear Mr. Lau,

Thank you for your recent correspondence requesting technical assistance on species biology, habitat, or life requisite requirements. The Pacific Islands Fish and Wildlife Office (PIFWO) of the U.S. Fish and Wildlife Service (Service) appreciates your efforts to avoid or minimize effects to protected species associated with your proposed actions. We provide the following information for your consideration under the authorities of the Endangered Species Act (ESA) of 1973 (16 U.S.C. 1531 *et seq*.), as amended.

Due to significant workload constraints, PIFWO is currently unable to specifically address your information request. The table below lists the protected species most likely to be encountered by projects implemented within the Hawaiian Islands. Based on your project location and description, we have noted the species most likely to occur within the vicinity of the project area, in the ‘**Occurs In or Near Project Area’** column. Please note this list is not comprehensive and should only be used for general guidance. We have added to the PIFWO website, located at https://www.fws.gov/pacificislands/promo.cfm?id=177175840 recommended conservation measures intended to avoid or minimize adverse effects to these federally protected species and best management practices to minimize and avoid sedimentation and erosion impacts to water quality.

If you are representing a federal action agency, please use the official species list on our web-site for your section 7 consultation. You can find out if your project occurs in or near designated critical habitat here: https://ecos.fws.gov/ipac/.

Under section 7 of the ESA, it is the Federal agency’s (or their non-Federal designee) responsibility to make the determination of whether or not the proposed project “may affect” federally listed species or designated critical habitat. A “may affect, not likely to adversely affect” determination is appropriate when effects to federally listed species are expected to be

discountable (*i.e.*, unlikely to occur), insignificant (minimal in size), or completely beneficial. This conclusion requires written concurrence from the Service. If a "may affect, likely to adversely affect" determination is made, then the Federal agency must initiate formal consultation with the Service. Projects that are determined to have "no effect" on federally listed species and/or critical habitat do not require additional coordination or consultation.

Implementing the avoidance, minimization, or conservation measures for the species that may occur in your project area will normally enable you to make a "may affect, not likely to adversely affect" determination for your project. If it is determined that the proposed project may affect federally listed species, we recommend you contact our office early in the planning process so that we may assist you with the ESA compliance. If the proposed project is funded, authorized, or permitted by a Federal agency, then that agency should consult with us pursuant to section 7(a)(2) of the ESA. If no Federal agency is involved with the proposed project, the applicant should apply for an incidental take permit under section 10(a)(1)(B) of the ESA. A section 10 permit application must include a habitat conservation plan that identifies the effects of the action on listed species and their habitats, and defines measures to minimize and mitigate those adverse effects.

We appreciate your efforts to conserve endangered species. We regret that we cannot provide you with more specific protected species information for your project site. If you have questions that are not answered by the information on our website, you can contact PIFWO at (808) 792-9400 and ask to speak to the lead biologist for the island where your project is located.

Sincerely,

Island Team Manager
Pacific islands Fish and Wildlife Office

The table below lists the protected species most likely to be encountered by projects implemented within the Hawaiian Islands. For your guidance, we‘ve marked species that may occur in the vicinity of your project, this list is not comprehensive and should only be used for general guidance.

Scientific Name	**Common Name / Hawaiian Name**	**Federal Status**	**May Occur In Project Area**
Mammals			
Lasiurus cinereus semotus	Hawaiian hoary bat/ ‘ōpe‘ape‘a	E	☒
Reptiles			
Chelonia mydas	Green sea turtle/honu - Central North Pacific DPS	T	☐
Erectmochelys imbricata	Hawksbill sea turtle/ Honu ‘ea	E	☐
Birds			
Anas wyvilliana	Hawaiian duck/ koloa	E	☐
Branta sandvicensis	Hawaiian goose/ nēnē	E	☐
Fulica alai	Hawaiian coot/ ‘alae kea	E	☐
Gallinula galeata sandvicensis	Hawaiian gallinule/ ‘alae ‘ula	E	☐
Himantopus mexicanus knudseni	Hawaiian stilt/ Ae‘o	E	☐
Oceanodroma castro	Band-rumped storm-petrel/ ‘akē‘akē	E	☐
Pterodroma sandwichensis	Hawaiian petrel/ ‘ua‘u	E	☐
Puffinus auricularis newelli	Newell’s shearwater/ ‘a‘o	T	☐
Ardenna pacificus	Wedge-tailed Shearwater/ ‘ua‘u kani	MBTA	☐
Gygis alba	White Tern/ manu-o-kū	MBTA	☒
Buteo solitarius	Hawaiian hawk/ ‘io	E	☐
Insects			
Manduca blackburni	Blackburn’s sphinx moth	E	☐
Megalagrion pacificum	Pacific Hawaiian Damselfly	E	☐
M. xanthomelas	Orangeblack Hawaiian Damselfly	E	☐
M. nigrohamatum nigrolineatum	Blackline Hawaiian Damselfly	E	☐

Plants				
Scientific Name	**Common Name or Hawaiian Name**	**Federal Status**	**Locations**	**May Occur In Project Area**
Abutilon menziesii	Ko‘oloa‘ula	E	O, L, M, H	☐
Achyranthes splendens var. *rotundata*	‘Ewa hinahina	E	O	☐
Bonamia menziesii	No common name	E	K, O, L, M, H	☐
Canavalia pubescens	‘Āwikiwiki	E	Ni, K, L, M	☐
Colubrina oppositifolia	Kauila	E	O, M, H	☐
Cyperus trachysanthos	Pu‘uka‘a	E	K, O	☐
Gouania hillebrandii	No common name	E	Mo, M	☐
Hibiscus brackenridgei	Ma‘o hau hele	E	O, Mo, L, M, H	☐
Ischaemum byrone	Hilo ischaemum	E	K, O, Mo, M, H	☐
Isodendrion pyrifolium	Wahine noho kula	E	O, H	☐
Marsilea villosa	‘Ihi‘ihi	E	Ni, O, Mo	☐
Mezoneuron kavaiense	Uhiuhi	E	O, H	☐
Nothocestrum breviflorum	‘Aiea	E	H	☐
Panicum fauriei var. *carteri*	Carter’s panicgrass	E	Molokini Islet (O), Mo	☐
Panicum niihauense	Lau‘ehu	E	K	☐
Peucedanum sandwicense	Makou	E	K, O, Mo, M	☐
Pleomele (Chrysodracon) hawaiiensis	Halapepe	E	H	☐
Portulaca sclerocarpa	‘Ihi	E	L, H	☐
Portulaca villosa	‘Ihi	E	Le, Ka, Ni, O, Mo, M, L, H, Nihoa	☐
Pritchardia affinis (maideniana)	Loulu	E	H	☐
Pseudognaphalium sandwicensium var. *molokaiense*	‘Ena‘ena	E	Mo, M	☐
Scaevola coriacea	Dwarf naupaka	E	Mo, M	☐
Schenkia (*Centaurium*) *sebaeoides*	‘Āwiwi	E	K, O, Mo, L, M	☐
Sesbania tomentosa	‘Ōhai	E	Ni, Ka, K, O, Mo, M, L, H, Necker, Nihoa	☐
Tetramolopium rockii	No common name	T	Mo	☐
Vigna o-wahuensis	No common name	E	Mo, M, L, H, Ka	☐

Location key: O=O‘ahu, K=Kaua‘i, M=Maui, H=Hawai‘i Island, L=Lāna‘i, Mo=Moloka‘i, Ka=Kaho‘olawe, Ni=Ni‘ihau, Le=Lehua

HHF PLANNERS
places for people

VIA EMAIL: pifwo_admin@fws.gov

Mr. Aaron Nadig
Island Team Manager
United States Department of the Interior
Fish and Wildlife Service
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawai‘i 96850

Dear Mr. Nadig:

Board of Water Supply Beretania Complex Redevelopment
Environmental Impact Statement Preparation Notice (EISPN)
Waikīkī Ahupuaa, Kona District, Island of O‘ahu, TMK: (1) 2-1-036: 001, 004, & 005
Reference No. 01EPIF00-2019-TA-0086

Thank you for your letter dated December 4, 2018 in response to the Environmental Impact Statement Preparation Notice (EISPN) for the above referenced project. We acknowledge that due to significant workload constraints, The Pacific Islands Fish and Wildlife Office (PIFWO) of the U.S. Fish and Wildlife Service is unable to specifically address this project. However, we appreciate the list of species which may occur in or near the Project Area.

Thank you for your participation in this process. Your letter and this response will be reproduced in the Draft EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Michael Matsuo, Board of Water Supply
Keane Kakuda, Architects Hawai‘i, Ltd.

Pacific Guardian Center | 733 Bishop Street, Suite 2590 | Honolulu, Hawaii 96813
Telephone: 808.545.2055 | Facsimile: 808.545.2050 | www.hhf.com | email: info@hhf.com

DAVID Y. IGE
GOVERNOR

CURT T. OTAGURO
COMPTROLLER

AUDREY HIDANO
DEPUTY COMPTROLLER

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

(P)1900.5

JAN 24 2019

Mr. Ernest Y. W. Lau, P.E.,
Manager and Chief Engineer
Board of Water Supply
City and County of Honolulu
630 South Beretania Street
Honolulu, Hawaii 96843

Dear Mr. Lau:

Subject: Board of Water Supply Beretania Complex Redevelopment Project
Kona District, Island of Oahu
TMK: (1) 2-1-036:001 and 2-1-036:005 (portion)

Thank you for the opportunity to provide comments for the subject project. We have no comments to offer at this time, as the subject project does not appear to directly impact any Department of Accounting and General Services' managed facilities. However, we do intend to monitor this project as it develops, given its close proximity to several of our facilities. We therefore respectfully ask to continue to be among the parties consulted as the EIS process moves forward.

If you have any questions, your staff may call Mr. Dennis Chen of the Public Works Division at 586-0491 or at dennis.yk.chen@hawaii.gov.

Sincerely,

CURT T. OTAGURO
Comptroller

c: The Honorable Kirk Caldwell, Mayor, City and County of Honolulu
Mr. Scott Ezer, Vice President; HHF Planners

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VIA EMAIL: dags@hawaii.gov

May 11, 2020

Mr. Curt T. Otaguro, Comptroller
State of Hawaii
Department of Accounting and General Services
P.O. Box 119
Honolulu, HI 96810-0119

Dear Mr. Otaguro:

Board of Water Supply Beretania Complex Redevelopment
Environmental Impact Statement Preparation Notice (EISPN)
Waikīkī Ahupuaa, Kona District, Island of Oʻahu, TMK: (1) 2-1-036: 001, 004, & 005

Thank you for your letter dated December 4, 2018 in response to the Environmental Impact Statement Preparation Notice (EISPN) for the above referenced project.

We note you have no comments to offer, as the subject project does not appear to directly impact any DAGS managed facilities. As requested, we will keep you on the consulted parties list.

Thank you for your participation in this process. Your letter and this response will be reproduced in the Draft EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

Pacific Guardian Center | 733 Bishop Street, Suite 2590 | Honolulu, Hawaii 96813
Telephone: 808.545.2055 | Facsimile: 808.545.2050 | www.hhf.com | email: info@hhf.com

forwarded Dept Land cc: Comm 181604

DISABILITY AND COMMUNICATION ACCESS BOARD

1010 Richards Street, Room 118 • Honolulu, Hawaii 96813
Ph. (808) 586-8121 • TTY (808) 586-8162 • Fax (808) 586-8129

LN-1211

2018 DEC 26 P 3:02

December 20, 2018

Mr. Ernest Y. W. Lau, P.E.
Manager and Chief Engineer
Board of Water Supply
City and County of Honolulu
630 South Beretania Street
Honolulu, HI 96843

Regarding: Board of Water Supply Beretania Complex Redevelopment

Dear Mr. Lau,

The Disability and Communication Access Board (DCAB) would like to offer its support to meet and discuss accessibility issues for the Board of Water Supply Beretania Complex Redevelopment. The purpose of the discussion is to ensure that this project, at this stage, will take into account accessibility design requirements for persons with disabilities in order to mitigate potential costly changes later in the design.

As this project is being constructed on County lands, it is covered by §103-50, Hawaii Revised Statutes (HRS). New construction of the Board of Water Supply Beretania Complex Redevelopment is required to comply with the Department of Justice's (DOJ) 2010 ADA Standards for Accessible Design (2010 Standards) http://www.ada.gov/2010ADAstandards_index.htm. To be consistent with the DOJ's standard, DCAB adopted the 2004 Americans with Disabilities Act Accessibility Guidelines (ADAAG) as of January 1, 2011 and passed interpretive opinions consistent with the 2010 ADA Standards. All new Interpretive Opinions can be viewed or downloaded at http://health.hawaii.gov/dcab/facility-access/interpretive-opinions/. This project includes proposals for housing which would appear to be covered by the Fair Housing Amendments Act and the Fair Housing Amendments Act Accessibility Guidelines. The DCAB review utilizes the first safe harbor on the list of safe harbors provided by the Department of Housing and Urban Development (HUD).

If the project is receiving federal funds it will also have to comply with the requirements under Section 504 of the Rehabilitation Act, but this is not included in the DCAB review process. If you have any questions regarding your obligations under Section 504 of the Rehabilitation Act you should contact the federal agency that is providing federal funds for your project.

Projects with construction documents that are covered by §103-50, HRS, are required to be submitted to DCAB for a formal document review.

Beyond DCAB's review process, program access obligations must be met under the ADA Title II provisions. This obligation may require additional means to provide access, especially where full compliance with the 2010 Standards cannot be achieved.

Thank you for taking time to review our request. We look forward to working with you on the Board of Water Supply Beretania Complex Redevelopment in an effort to provide access for persons with disabilities.

Should you have any further questions, please feel free to contact Duane Buote, Facility Access Coordinator at (808) 586-8121.

Sincerely,

Francine Wai

FRANCINE WAI
Executive Director

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843
www.boardofwatersupply.com

KIRK CALDWELL, MAYOR

BRYAN P. ANDAYA, Chair
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ROSS S. SASAMURA, Ex-Officio
JADE T. BUTAY, Ex-Officio

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

ELLEN E. KITAMURA, P.E.
Deputy Manager and Chief Engineer

January 31, 2019

Ms. Francine Wai
Executive Director
Disability and Communication Access Board
1010 Richard Street, Room 118
Honolulu, Hawaii 96813

Dear Ms. Wai:

Subject: YOUR LETTER DATED DECEMBER 20, 2018 REGARDING THE ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE FOR THE BOARD OF WATER SUPPLY BERETANIA COMPLEX REDEVELOPMENT PROJECT

Thank you for submitting comments on the subject Environmental Impact Statement (EIS) Preparation Notice.

We have forwarded your comments to our consultants Architects Hawaii, Ltd. and HHF Planners for consideration. A formal response will be sent to you prior to the publication of the draft EIS, which is scheduled for June 2019.

If you have any questions, please contact Michael Matsuo of our Land Division at 748-5951.

Very truly yours,

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

Cc: Keane Kakuda, Architects Hawaii, Ltd.
Scott Ezer, HHF Planners

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VIA EMAIL: Kirby.shaw@doh.hawaii.gov

May 11, 2020

Mr. Kirby Shaw, Executive Director
Disability and Communication Access Board
1010 Richards Street, Rom 118
Honolulu, HI 96813

Dear Mr. Shaw:

Board of Water Supply Beretania Complex Redevelopment
Environmental Impact Statement Preparation Notice (EISPN)
Waikīkī Ahupuaa, Kona District, Island of Oʻahu, TMK: (1) 2-1-036: 001, 004, & 005

We have received DCAB's letter from former Director Ms. Francine Wai, dated December 20, 2018 in response to the Environmental Impact Statement Preparation Notice (EISPN) for the above referenced project.

We appreciate your offer to meet and discuss accessibility issues, to ensure that the project considers accessibility design requirements and avoids potential costly changes later in design. These discussions would be appropriate at a later phase of the project. The BWS plans to issue a Request for Proposals (RFP) for the site, and the final land use and facility design will be determined by the selected developer. The RFP will state that the prospective developer must comply with the DOJ 2010 ADA Standards for Accessible Design and the 2004 ADA Accessibility Guidelines. The RFP will also indicate that the development will require DCAB review and approval, and recommend early consultation with DCAB.

Thank you for your participation in this process. The letter and this response will be reproduced in the Draft EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

DAVID Y. IGE
GOVERNOR

DR. CHRISTINA M. KISHIMOTO
SUPERINTENDENT

181520

STATE OF HAWAI`I

DEPARTMENT OF EDUCATION

P.O. BOX 2360

HONOLULU, HAWAI`I 96804

OFFICE OF SCHOOL FACILITIES AND SUPPORT SERVICES

2018 DEC -4 A 11:48

CC: Comm

November 28, 2018

Ernest Y.W. Lau
Manager and Chief Engineer
Board of Water Supply
City and County of Honolulu
630 South Beretania Street
Honolulu, Hawaii 96843

Re: Environmental Impact Statement Preparation Notice for the Board of Water Supply Beretania Complex Redevelopment Project

Dear Mr. Lau:

The Department of Education (DOE) has reviewed the Preparation Notice for a Draft Environmental Impact Statement (EISPN) for the redevelopment of the Board of Water Supply's Beretania Complex (Complex).

The Office of School Facilities and Support Services, Facilities Development Branch (FDB) will be the appropriate office to be consulted on the plans prior to the release of the Draft Environmental Impact Statement (DEIS).

The FDB has two questions we would like to see addressed in the DEIS. First, would school age children be permitted to live in the affordable senior rental apartments? Second, what would happen to the senior rental apartments after the 65-year lease has expired?

The Complex is located within the DOE's Kalihi to Ala Moana School Impact Fee District. If senior rental apartments are built and they permit school age children to reside in the project, the DOE would collect school impact fees on each unit. If it is anticipated that the apartments would not permit children but would be used by the wider public after the initial lease period is completed, the DOE would want to have an educational contribution agreement stating that school impact fees would be paid when school age children are permitted to live in the Complex.

If you have any questions, please call Heidi Meeker, Land Use Planner of the FDB, Planning Section, at 784-5095.

Respectfully,

Kenneth G. Masden
Public Works Manager
Planning Section

KGM:hm

c: Linell Dilwith, Complex Area Superintendent, Kaimuki/McKinley/Roosevelt Complex Area

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843
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ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

ELLEN E. KITAMURA, P.E.
Deputy Manager and Chief Engineer

January 31, 2019

Mr. Kenneth G. Masden
Public Works Manager
Planning Section
State of Hawaii
Department of Education
Office of School Facilities and Support Services
P.O. Box 2360
Honolulu, Hawaii 96804

Dear Mr. Masden:

Subject: YOUR LETTER DATED NOVEMBER 28, 2018 REGARDING THE ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE FOR THE BOARD OF WATER SUPPLY BERETANIA COMPLEX REDEVELOPMENT PROJECT

Thank you for submitting comments on the subject Environmental Impact Statement (EIS) Preparation Notice.

We have forwarded your comments to our consultants Architects Hawaii, Ltd. and HHF Planners for consideration. A formal response will be sent to you prior to the publication of the draft EIS, which is scheduled for June 2019.

If you have any questions, please contact Michael Matsuo of our Land Division at 748-5951.

Very truly yours,

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

Cc: Keane Kakuda, Architects Hawaii, Ltd.
Scott Ezer, HHF Planners

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VIA EMAIL: Heidi_Meeker/FacilDev/HIDOE@notes.k12.hi.us

May 11, 2020

Mr. Kenneth G. Masden, Public Works Manager
Planning Section
State of Hawai'i Department of Education
P.O. Box 2360
Honolulu, HI 96804

Dear Mr. Masden:

Board of Water Supply Beretania Complex Redevelopment
Environmental Impact Statement Preparation Notice (EISPN)
Waikīkī Ahupuaa, Kona District, Island of O'ahu, TMK: (1) 2-1-036: 001, 004, & 005

Thank you for your letter dated November 28, 2018 in response to the Environmental Impact Statement Preparation Notice (EISPN) for the above referenced project. The following are responses to your comments:

Comment: Would school age children be permitted to live in the affordable senior rental apartments?

Response: If assisted care living is constructed, the use will not increase school aged children. If affordable senior rental housing is constructed, children will not be allowed to live in the units. According to federal Housing and Urban Development (HUD) regulations, in a senior living community defined as "62 and older," all residents (including spouses) must be 62 years of age or older. This means that no children are allowed to live there, even if a resident is their legal guardian.

The final use of the site will be determined by the selected developer, and there is always the possibility that a different land use will be proposed that will impact school enrollment. The developer will be required to consult with the DOE on this matter if a residential use other than those described in this DEIS is proposed.

Comment: What would happen to the senior rental apartments after the 65-year lease has expired?

Response: The uses of the property and future structures beyond the initial lease period are unknown at this time. It is anticipated that the initial lease period will be approximately 65 years, representing more than one generation, and demographic conditions in the school service area are likely to change significantly during that period. Demographic trends in the project vicinity, and throughout O'ahu as a whole, show an aging population, with fewer school aged children. If, at the time the lease is renegotiated, uses are proposed that could have an impact on school enrollment, appropriate mitigation can be negotiated between the DOE and the developer.

Thank you for your participation in this process. Your letter and this response will be reproduced in the Draft EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

DAVID Y. IGE
GOVERNOR
STATE OF HAWAII

JOSH GREEN
LT. GOVERNOR
STATE OF HAWAII

JOBIE M. K. MASAGATANI
CHAIRMAN
HAWAIIAN HOMES COMMISSION

WILLIAM J. AILA, JR.
DEPUTY TO THE CHAIRMAN

STATE OF HAWAII
DEPARTMENT OF HAWAIIAN HOME LANDS
P. O. BOX 1879
HONOLULU, HAWAII 96805

December 11, 2018

Attention: Ernest Y.W. Lau, P.E. Manager & Chief Engineer
Board of Water Supply, C&C Honolulu
630 South Beretania Street
Honolulu, Hawaii 96843

Dear Mr. Lau:

Subject: Board of Water Supply Beretania Complex Redevelopment Project
Kona District, Island of Oahu
TMK: (1) 2-1-036:001 & 2-1-036:005 (por)

The Department of Hawaiian Home Lands acknowledges receiving the request for comments on the above-cited project. After reviewing the materials submitted, due to its lack of proximity to Hawaiian Home Lands, we do not anticipate any impacts to our lands or beneficiaries from the project.

However, we highly encourage all agencies to consult with Hawaiian Homestead community associations and other (N)native Hawaiian organizations when preparing environmental assessments, to better assess potential impacts to cultural and natural resources, access, and other rights of Native Hawaiians.

Mahalo for the opportunity to provide comments. If you have any questions, please call Rae Ann Hyatt at 620-9480 or contact via email at raeann.p.hyatt@hawaii.gov.

Sincerely,

M. Kaleo Manuel
Acting Planning Program Manager

✓cc: HHF Planners

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843
www.boardofwatersupply.com

KIRK CALDWELL, MAYOR

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MAX J. SWORD

ROSS S. SASAMURA, Ex-Officio
JADE T. BUTAY, Ex-Officio

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

ELLEN E. KITAMURA, P.E.
Deputy Manager and Chief Engineer

January 31, 2019

Mr. M. Kaleo Manuel
Acting Planning Program Manager
State of Hawaii
Department of Hawaiian Home Lands
P.O. Box 1879
Honolulu, Hawaii 96805

Dear Mr. Manuel:

Subject: YOUR LETTER DATED DECEMBER 11, 2018 REGARDING THE ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE FOR THE BOARD OF WATER SUPPLY BERETANIA COMPLEX REDEVELOPMENT PROJECT

Thank you for submitting comments on the subject Environmental Impact Statement (EIS) Preparation Notice.

We have forwarded your comments to our consultants Architects Hawaii, Ltd. and HHF Planners for consideration. A formal response will be sent to you prior to the publication of the draft EIS, which is scheduled for June 2019.

If you have any questions, please contact Michael Matsuo of our Land Division at 748-5951.

Very truly yours,

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

Cc: Keane Kakuda, Architects Hawaii, Ltd.
Scott Ezer, HHF Planners

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VIA EMAIL: andrew.h.choy@hawaii.gov

May 11, 2020

Mr. Andrew Choy, Planning Program Manager
State of Hawai'i Department of Hawaiian Home Lands
P.O. Box 1879
Honolulu, Hawai'i 96805

Dear Mr. Choy:

Board of Water Supply Beretania Complex Redevelopment
Environmental Impact Statement Preparation Notice (EISPN)
Waikīkī Ahupuaa, Kona District, Island of O'ahu, TMK: (1) 2-1-036: 001, 004, & 005

Thank you for your letter dated December 11, 2018 in response to the Environmental Impact Statement Preparation Notice (EISPN) for the above referenced project. We acknowledge your comment that due to its lack of proximity to Hawaiian Home Lands, DHHL does not anticipate any impacts to its lands or beneficiaries from the project.

The Cultural Impact Assessment (CIA) prepared for the project included consultation with Hawaiian Homestead community associations and other Native Hawaiian organizations and stakeholders to assess potential impact to cultural and natural resources, access and other rights of Native Hawaiians. The CIA will be included in the Draft EIS.

Thank you for your participation in this process. Your letter and this response will be reproduced in the Draft EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

DAVID Y. IGE
GOVERNOR OF HAWAII

SUZANNE D. CASE
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

December 20, 2018

City and County of Honolulu
Board of Water Supply
Attention: Mr. Ernest Y.W. Lau, P.E.,
Manager & Chief Engineer
530 South Beretania Street
Honolulu, Hawaii 96813

via email bwsredevelopmenteis@hff.com

Dear Mr. Lau:

SUBJECT: Environmental Impact Statement Preparation Notice (EISPN) for the **Board of Water Supply Beretania Complex Redevelopment Project**

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

At this time, enclosed are comments from the (a) Engineering Division and (b) Land Division – Oahu District on the subject matter. Should you have any questions, please feel free to call Lydia Morikawa at 587-0410. Thank you.

Sincerely,

Russell Y. Tsuji
Land Administrator

Enclosure(s)
cc: Central Files
Mayor, City and County of Honolulu
Mr. Scott Ezer, Vice President, HHF Planners

DAVID Y. IGE
GOVERNOR OF HAWAII

SUZANNE D. CASE
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

November 26, 2018

'18 NOV 27 AM 11:29 ENGINEERING

MEMORANDUM

FROM

TO

TO: **DLNR Agencies:**
__Div. of Aquatic Resources
__Div. of Boating & Ocean Recreation
X Engineering Division
__Div. of Forestry & Wildlife
__Div. of State Parks
X 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: Environmental Impact Statement Preparation Notice (EISPN) for the **Board of Water Supply Beretania Complex Redevelopment Project**
LOCATION: Honolulu, Island of Oahu; TMK Nos. (1) 2-1-036:001 & 005(por.)
APPLICANT: The Board of Water Supply, City and County of Honolulu

Transmitted for your review and comment is information on the above-referenced project. Please submit any comments by **December 20, 2018.**

The EISPN can be found on-line at: http://health.hawaii.gov/oeqc/ (Click on the Current Environmental Notice in the middle of the page.)

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 Lydia Morikawa at 587-0410. Thank you.

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

Signed: _____

Print Name: Carty S. Chang, Chief Engineer

Date: 12/11/18

Attachments
cc: Central Files

DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION

LD/Russell Y. Tsuji
Ref: Environmental Impact Statement Preparation Notice (EISPN) for the Board of Water Supply Beretania Complex Redevelopment Project, Honolulu, Island of Oahu; TMK Nos. (1) 2-1-036:001 &005 (por.)

COMMENTS

The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a Special Flood Hazard Area (high risk areas). State projects are required to comply with 44CFR regulations as stipulated in Section 60.12. Be advised that 44CFR reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may stipulate higher standards that can be more restrictive and would take precedence over the minimum NFIP standards.

The owner of the project property and/or their representative is responsible to research the Flood Hazard Zone designation for the project. Flood Hazard Zones are designated on FEMA's Flood Insurance Rate Maps (FIRM), which can be viewed on our Flood Hazard Assessment Tool (FHAT) (http://gis.hawaiinfip.org/FHAT).

If there are questions regarding the local flood ordinances, please contact the applicable County NFIP coordinating agency below:

- Oahu: City and County of Honolulu, Department of Planning and Permitting (808) 768-8098.
- Hawaii Island: County of Hawaii, Department of Public Works (808) 961-8327.
- Maui/Molokai/Lanai County of Maui, Department of Planning (808) 270-7253.
- Kauai: County of Kauai, Department of Public Works (808) 241-4846.

Signed: _____
CARTY S. CHANG, CHIEF ENGINEER

Date: 12/11/18

DAVID Y. IGE
GOVERNOR OF HAWAII

SUZANNE D. CASE
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

November 26, 2018

MEMORANDUM

TO: **DLNR Agencies:**
___Div. of Aquatic Resources
___Div. of Boating & Ocean Recreation
_X_Engineering Division
___Div. of Forestry & Wildlife
___Div. of State Parks
_X_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: Environmental Impact Statement Preparation Notice (EISPN) for the **Board of Water Supply Beretania Complex Redevelopment Project**
LOCATION: Honolulu, Island of Oahu; TMK Nos. (1) 2-1-036:001 & 005(por.)
APPLICANT: The Board of Water Supply, City and County of Honolulu

Transmitted for your review and comment is information on the above-referenced project. Please submit any comments by **December 20, 2018.**

The EISPN can be found on-line at: http://health.hawaii.gov/oeqc/ (Click on the Current Environmental Notice in the middle of the page.)

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 Lydia Morikawa at 587-0410. Thank you.

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

Signed: Darlene Bryant-Takamatsu

Print Name: Darlene Bryant-Takamatsu
Date: 11/29/18

Attachments
cc: Central Files

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843
www.boardofwatersupply.com

KIRK CALDWELL, MAYOR

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ROSS S. SASAMURA, Ex-Officio
JADE T. BUTAY, Ex-Officio

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

ELLEN E. KITAMURA, P.E.
Deputy Manager and Chief Engineer

January 31, 2019

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

Dear Mr. Tsuji:

Subject: YOUR LETTER DATED DECEMBER 20, 2018 REGARDING THE ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE FOR THE BOARD OF WATER SUPPLY BERETANIA COMPLEX REDEVELOPMENT PROJECT

Thank you for submitting comments on the subject Environmental Impact Statement (EIS) Preparation Notice.

We have forwarded your comments to our consultants Architects Hawaii, Ltd. and HHF Planners for consideration. A formal response will be sent to you prior to the publication of the draft EIS, which is scheduled for June 2019.

If you have any questions, please contact Michael Matsuo of our Land Division at 748-5951.

Very truly yours,

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

Cc: Keane Kakuda, Architects Hawaii, Ltd.
Scott Ezer, HHF Planners

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VIA EMAIL: dlnr.land@hawaii.gov

May 11, 2020

Mr. Russell Y. Tsuji, Land Administrator
State of Hawai‘i Department of Land and Natural Resources
P.O. Box 621
Honolulu, Hawai‘i 96809

Dear Mr. Tsuji:

Board of Water Supply Beretania Complex Redevelopment
Environmental Impact Statement Preparation Notice (EISPN)
Waikīkī Ahupuaa, Kona District, Island of O‘ahu, TMK: (1) 2-1-036: 001, 004, & 005

Thank you for your letter dated December 20, 2018 in response to the Environmental Impact Statement Preparation Notice (EISPN) for the above referenced project. The following is our response to the comments provided by DLNR’s Engineering Division and Land Division-O‘ahu District.

Engineering Division
The Draft EIS (DEIS) will include information on the property’s Flood Hazard Zone designations and the redevelopment project will comply with applicable standards.

Land Division-O‘ahu District
We acknowledge that the Land Division has no comments on the project.

Thank you for your participation in this process. Your letter and this response will be reproduced in the Draft EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

Pacific Guardian Center | 733 Bishop Street, Suite 2590 | Honolulu, Hawaii 96813
Telephone: 808.545.2055 | Facsimile: 808.545.2050 | www.hhf.com | email: info@hhf.com

OFFICE OF PLANNING
STATE OF HAWAII

DAVID Y. IGE
GOVERNOR

LEO R. ASUNCION
DIRECTOR
OFFICE OF PLANNING

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

Telephone: (808) 587-2846
Fax: (808) 587-2824
Web: http://planning.hawaii.gov/

DTS201812211441BE

December 24, 2018

Mr. Ernest Y.W. Lau, P.E.
Manager and Chief Engineer
Board of Water Supply
City and County of Honolulu
630 S. Beretania Street
Honolulu, Hawaii 96843

Dear Mr. Lau:

Subject: Environmental Impact Statement Preparation Notice – Board of Water Supply
Beretania Complex Redevelopment Project, Kona District, Oahu
TMK: (1) 2-1-036: 001, 004 and 005 (por)

Thank you for the opportunity to provide comments on this Environmental Impact Statement Preparation Notice (EISPN) for the City and County of Honolulu, Board of Water Supply (BWS) Beretania Street Complex redevelopment project. The EISPN notification letter was transmitted to our office dated November 19, 2018.

It is our understanding that BWS proposes to redevelop a 128,100 square foot area within the 6.3-acre BWS Beretania Street complex. BWS plans to enter into a development contract and ground lease with a developer to be determined. The project area is currently being used as ground level parking for City and County of Honolulu employees.

Future development at the site will be determined by the selected developer. Three possible development scenarios will be evaluated in the Draft Environmental Impact Statement (DEIS). Development components may include a new BWS office building with a multi-story parking structure; an assisted care living facility; or an affordable senior rental housing complex. All of these alternative uses are permitted under the area's existing City and County of Honolulu land use zoning.

The Office of Planning (OP) has reviewed the transmitted material and has the following comments to offer:

1. Climate Change
   We note that Section 5.1.3, page 18 of the EISPN introduces the concept of Climate Change and states that the DEIS will discuss climate change issues, as they relate to the proposed project.

In regard to climate change, the DEIS should evaluate the project areas exposure and susceptibility to intensified natural hazards linked to climate change. This analysis would benefit from verifying the project area's exposure rate to environmental threats such as flooding and storm inundation. If the project area proves to be at risk to these dangers, the DEIS should consider adaptation strategies to reduce the vulnerability of the built environment and safeguard planned structures from climate change associated hazards.

2. Drainage/Stormwater Runoff Controls/Low Impact Development (LID)
Section 5.2.4.1, page 24 of the EISPN states the DEIS will describe existing and proposed drainage patterns, both regionally and within the project area. The analysis continues, by stating that existing and proposed runoff quantities will be calculated.

We note that based on the information provided in the EISPN, due to the project area's size and the potential increase of impervious surfaces, this redevelopment project may be subject to the City and County of Honolulu, Department of Planning and Permitting (DPP) rules on drainage and onsite stormwater management. Please contact DPP on LID post construction standards to determine if they pertain to this project.

To assist in the development of onsite stormwater management plans, OP has developed guidance documents on this subject. We recommend consulting these evaluative tools when developing mitigation methods to offset polluted storm runoff. These documents offer useful techniques to keep land-based pollutants and sediment in place, while considering the management practices best suited for the topography of the area and the types of contaminants potentially affecting nearby water resources. These useful stormwater evaluative tools include:

- Stormwater Impact Assessments assists in identifying and evaluating information on hydrology, stressors, sensitivity of aquatic and riparian resources, and management measures to control runoff, as well as consider secondary and cumulative impacts to the area: http://files.hawaii.gov/dbedt/op/czm/initiative/stomwater_impact/final_stormwater_impact_assessments_guidance.pdf; and

- Low Impact Development (LID), A Practitioners Guide covers a range of structural best management practices for stormwater control management and layout that minimizes environmental impacts: http://files.hawaii.gov/dbedt/op/czm/initiative/lid/lid_guide_2006.pdf.

3. Hawaii Coastal Zone Management (CZM) Program
Section 6.1, Land Use Plans, Policies, and Controls, page 27, of the EISPN states that the DEIS will discuss the relationship of the proposed action with the CZM Program.

OP concurs that the DEIS should examine the proposed project's consistency with the objectives and supporting policies of the Hawaii CZM Program, Hawaii Revised Statutes (HRS) § 205A-2. Compliance with HRS § 205A-2 is a vital component for satisfying the requirements of HRS Chapter 343.

4. Hawaii State Planning Act
   Section 6.1, Land Use Plans, Policies, and Controls, page 27, of the EISPN states that the DEIS will discuss the relationship of the proposed action with the Hawaii State Plan, as well as compatible State Functional Plans.

   OP concurs that the DEIS should examine the proposed project's relevance with all parts of HRS Chapter 226, the Hawaii State Planning Act. The analysis should examine the project's compatibility with Part I – the goals, objectives, and policies; Part II – planning coordination and implementation (State Functional Plans); and Part III – priority guidelines; or clarify where it is in conflict with them. If any of these provisions are not applicable to this project, the analysis should affirmatively state such determination, followed by discussion paragraphs.

5. Affordable Senior Rental Housing
   According to the EISPN, of the three alternatives being considered in the DEIS for the redevelopment of the Beretania Complex, one includes an affordable senior rental housing concept. Pursuant to Act 127, Session Laws of Hawaii 2016, a Special Action Team on affordable housing was established to make recommendations on actions to promote affordable rental housing statewide.

   A key goal of Act 127 is to achieve 22,500 affordable rental housing units by December 31, 2026. For the senior housing option, the DEIS should identify the number of affordable rental units that may be made available, which may then be included towards this goal.

We have no further comments at this time. If you have any questions regarding this comment letter, please contact Joshua Hekekia of our office at (808) 587-2845.

Sincerely,

Leo R. Asuncion
Director

c: The Honorable Kirk Caldwell, Mayor, City and County of Honolulu; c/o Board of Water
✓Scott Ezer, Vice President, HHF Planners

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843
www.boardofwatersupply.com

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ROSS S. SASAMURA, Ex-Officio
JADE T. BUTAY, Ex-Officio

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

ELLEN E. KITAMURA, P.E.
Deputy Manager and Chief Engineer

January 31, 2019

Mr. Leo R. Asuncion
Director
Office of Planning
State of Hawaii
235 South Beretania Street, 6th Floor
Honolulu, Hawaii 96813

Dear Mr. Asuncion:

Subject: YOUR LETTER DATED DECEMBER 24, 2018 REGARDING THE ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE FOR THE BOARD OF WATER SUPPLY BERETANIA COMPLEX REDEVELOPMENT PROJECT

Thank you for submitting comments on the subject Environmental Impact Statement (EIS) Preparation Notice.

We have forwarded your comments to our consultants Architects Hawaii, Ltd. and HHF Planners for consideration. A formal response will be sent to you prior to the publication of the draft EIS, which is scheduled for June 2019.

If you have any questions, please contact Michael Matsuo of our Land Division at 748-5951.

Very truly yours,

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

Cc: Keane Kakuda, Architects Hawaii, Ltd.
Scott Ezer, HHF Planners

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VIA EMAIL: MaryAlice.Evans@hawaii.gov

May 11, 2020

Ms. Mary Alice Evans
Office of Planning
State of Hawaiʻi
P.O. Box 2359
Honolulu, Hawaiʻi 96804

Dear Ms. Evans:

Board of Water Supply Beretania Complex Redevelopment
Environmental Impact Statement Preparation Notice (EISPN)
Waikīkī Ahupuaa, Kona District, Island of Oʻahu, TMK: (1) 2-1-036: 001, 004, & 005

Thank you for the Office of Planning letter from Mr. Leo Asuncion dated December 24, 2018 in response to the Environmental Impact Statement Preparation Notice (EISPN) for the above referenced project. The following is our response to your comments.

Comment 1: Climate Change

Response: The Draft EIS will discuss climate change issues as they relate to the proposed project, including susceptibility to intensified natural hazards linked to climate change. If the project area is found to be at risk, adaptation strategies will be discussed.

Comment 2: Drainage/Stormwater Runoff Controls/Low Impact Development (LID)

The BWS will issue a Request for Proposals for the property, and the selected developer will determine the final land use(s) and project design, including the location and extent of impervious surfaces. The developer will be required to comply with all stormwater runoff standards, and the RFP will recommend that DPP be contacted to determine whether LID post construction standards are applicable to the project. The developer will be responsible to develop and implement specific mitigation methods to offset polluted storm runoff, utilizing the resources that you have listed.

Comment 3: Hawaiʻi Coastal Zone Management Program

The Draft EIS will discuss the relationship of the proposed action with the CZM program.

Comment 4: Hawaiʻi State Planning Act

The Draft EIS will examine the project's relevance with the Hawaiʻi State Plan, as well as compatible State Functional Plans. It will examine relevance too all parts of HRS Chapter 22, the Hawaii State Planning Act, including Part I (goals, objective and policies), Part II (State Functional Plans) and Part III (priority guidelines).

Comment 5: Affordable Senior Rental Housing

For the affordable senior rental housing option, the Draft EIS will estimate the number of affordable rental units that may be made available.

Thank you for your participation in this process. Your letter and this response will be reproduced in the Draft EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

DAVID Y. IGE
GOVERNOR

JADE T. BUTAY
DIRECTOR

Deputy Directors
ROSS M. HIGASHI
EDWIN H. SNIFFEN
DARRELL T. YOUNG

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

IN REPLY REFER TO:
DIR 1328
STP 8.2567

December 18, 2018

Mr. Scott Ezer
Vice President
HHF Planners
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

Dear Mr. Ezer:

Subject: Board of Water Supply Beretania Complex Redevelopment Project
Environmental Impact Statement Preparation Notice
Honolulu, Oahu, Hawaii
TMK: (1) 2-1-036:001 and 005 (por.)

The Department of Transportation (DOT) understands the Honolulu Board of Water Supply (BWS) proposes to redevelop a portion, up to 128,000 square feet of its Beretania Street complex, for improvements that may include but not be limited to, a new BWS office building, multi-story parking, assisted care or affordable senior rental house.

DOT comments on the subject project are as follows:

Airports Division

1. The proposed Board of Water Supply Beretania Complex Redevelopment Project is approximately 19,536 feet from the end of Runway 26R at Daniel K. Inouye International Airport (HNL). All projects within 5 miles from Hawaii State airports are advised to read the Technical Assistance Memorandum (TAM) for guidance with development and activities that may require further review and permits. The TAM can be viewed at this link: http://files.hawaii.gov/dbedt/op/docs/TAM-FAA-DOT-Airports_08-01-2016.pdf.

2. Federal Aviation Administration (FAA) regulation requires the submittal of FAA Form 7460-1 Notice of Proposed Construction or alteration pursuant to the Code of Federal Regulations, Title 14, Part 77.9, if the construction or alteration is within 20,000 feet of a public use or military airport which exceeds a 100:1 surface from any point on the runway of each airport with its longest runway more than 3,200 feet. The form and criteria for submittal can be found at the following website: https://oeaaa.faa.gov/oeaaa/external/portal.jsp.

3. Photovoltaic (PV) panel installations have the potential to create glint and glare hazard condition for aircraft pilots. If the proposed project includes PV installation, it is recommended that the project proponent conduct a glint and glare analysis to ensure that the solar energy installation will not create hazardous conditions to HNL flight operations. Please see the following website for more information: www.sandia.gov/glare. Large-scale solar energy installations also have the potential to emit radio frequency interference (RFI).

   Glint, glare, RFI, PV panels and tall equipment (such as cranes that may be used during construction) can create hazardous conditions to pilots. Any such PV system, construction equipment, and/or other structure that creates such a hazardous condition for pilots, must be immediately mitigated by the owner upon notification by the Hawaii Department of Transportation, Airports Division and/or by FAA.

Highways Division

Although the proposed development would access roads under the jurisdiction of the City and County of Honolulu, the proximity of what may be a sizeable traffic generator, beyond existing traffic, could impact traffic operations to and from Lunalilo Freeway, Interstate H-1.

A traffic assessment shall be prepared and submitted for our review and acceptance. The assessment should estimate traffic circulation to and from H-1. For example, the Kinau Street off-ramp allows for relatively direct access to the BWS complex area and in part because of traffic for the Queen's Medical Center Physician Office Buildings on Lusitania Street. Congestion at those locations could result in backup queues that further impact the off-ramp.

If there are any questions, please contact Mr. Blayne Nikaido of the DOT Statewide Transportation Planning Office at (808) 831-7979 or by email at blayne.h.nikaido@hawaii.gov.

Sincerely,

JADE T. BUTAY
Director of Transportation

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VIA EMAIL: blayne.h.nikaido@hawaii.gov

May 11, 2020

Mr. Jade T. Butay, Director of Transportation
State of Hawai'i
Department of Transportation
869 Punchbowl Street
Honolulu, Hawai'i 96813-5097

Dear Mr. Butay:

Board of Water Supply Beretania Complex Redevelopment
Environmental Impact Statement Preparation Notice (EISPN)
Waikīkī Ahupuaa, Kona District, Island of O'ahu, TMK: (1) 2-1-036: 001, 004, & 005

Thank you for your letter dated December 18, 2018 in response to the Environmental Impact Statement Preparation Notice (EISPN) for the above referenced project. The following is our response to your comments.

Airports Division

1. The proposed project is approximately 19,536 feet from the end of Runway 26R at Daniel K. Inouye International Airport (HNL). All projects within 5 miles from Hawai'i State airports are advised to read the Technical Assistance Memorandum (TAM) for guidance with development and activities that may require further review and permits…

2. Federal Aviation Administration (FAA) regulation requires the submittal of FAA Form 7460-1 Notice of Proposed Construction or alteration pursuant to the CFR Title 14, Part 77.9, if the construction or alteration is within 20,000 feet of a public use or military airport…

3. Photovoltaic (PV) panes installations have the potential to create glint and glare hazard condition for aircraft pilots. If the proposed project includes PV installation, it is recommended that that the project proponent conduct a glint and glare analysis to ensure that the solar energy installations will not create hazardous conditions…Glint, glare, RFI, PV panels and tall equipment…can c rate hazardous conditions to pilots…

Response: The Draft EIS will discuss the need for project consistency with FAA Order 5190.6B and the Office of Planning TAM. The selected developer will be apprised that they are required to comply with the TAM, must submit FAA Form 7460-1, and ensure the redevelopment project does not create hazardous conditions to pilots due to glint/glare, RFI, or tall equipment.

Highways Division

Comment: A traffic assessment shall be prepared and submitted for our review and acceptance…

Response: A traffic impact report has been prepared and will be included in the Draft EIS.

Thank you for your participation in this process. Your letter and this response will be reproduced in the Draft EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

DEPARTMENT OF FACILITY MAINTENANCE

CITY AND COUNTY OF HONOLULU

1000 Ulu'ohia Street, Suite 215, Kapolei, Hawaii 96707
Phone: (808) 768-3343 • Fax: (808) 768-3381
Website: www.honolulu.gov

KIRK CALDWELL
MAYOR

ROSS S. SASAMURA, P.E.
DIRECTOR AND CHIEF ENGINEER

EDUARDO P. MANGLALLAN
DEPUTY DIRECTOR

IN REPLY REFER TO:
DRM 18-698

December 5, 2018

Mr. Scott Ezer
HHF Planners
Pacific Guardian Center
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

Dear Mr. Ezer:

Subject: Board of Water Supply Beretania Complex Redevelopment Project
(1) 2-1-036:001 & 2-1-036:005 (portion)

Thank you for the opportunity to review and comment on the subject project.

Our comments are as follows:

- During construction and upon completion of project; any damages/deficiencies to Lauhala Street, Alapai Street, Lisbon Street and Lusitana Street right-of-way shall be corrected to City Standards and accepted by the City and at no cost to the City and County of Honolulu.

If you have any questions, please call Mr. Kyle Oyasato of the Division of Road Maintenance at 768-3697.

Sincerely,

Ross S. Sasamura, P.E.
Director and Chief Engineer

cc: Board of Water Supply, Ernest Lau

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843
www.boardofwatersupply.com

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BRYAN P. ANDAYA, Chair
KAPUA SPROAT, Vice Chair
KAY C. MATSUI
RAY C. SOON
MAX J. SWORD

ROSS S. SASAMURA, Ex-Officio
JADE T. BUTAY, Ex-Officio

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

ELLEN E. KITAMURA, P.E.
Deputy Manager and Chief Engineer

January 31, 2019

TO: ROSS S. SASAMURA, P.E., DIRECTOR AND CHIEF ENGINEER
DEPARTMENT OF FACILITY MAINTENANCE

FROM: ERNEST Y. W. LAU, P.E., MANAGER AND CHIEF ENGINEER
BOARD OF WATER SUPPLY

SUBJECT: YOUR MEMORANDUM DATED DECEMBER 5, 2018 REGARDING THE ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE FOR THE BOARD OF WATER SUPPLY BERETANIA COMPLEX REDEVELOPMENT PROJECT, HONOLULU, OAHU, HAWAII

Thank you for submitting comments on the subject Environmental Impact Statement (EIS) Preparation Notice.

We have forwarded your comments to our consultants Architects Hawaii, Ltd. and HHF Planners for consideration. A formal response will be sent to you prior to the publication of the draft EIS, which is scheduled for June 2019.

If you have any questions, please contact Michael Matsuo of our Land Division at 748-5951.

Cc: Keane Kakuda, Architects Hawaii, Ltd.
Scott Ezer, HHF Planners

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VIA EMAIL: koyasato@honolulu.gov

May 11, 2020

Mr. Ross S. Sasamura, P.E.
Director and Chief Engineer
Department of Facility Maintenance
City and County of Honolulu
1000 Ulu ʻohia Street, Suite 215
Kapolei, Hawaiʻi 96707

Dear Mr. Sasamura:

Board of Water Supply Beretania Complex Redevelopment
Environmental Impact Statement Preparation Notice (EISPN)
Waikīkī Ahupuaa, Kona District, Island of Oʻahu, TMK: (1) 2-1-036: 001, 004, & 005

Thank you for your letter dated December 5, 2018 in response to the Environmental Impact Statement Preparation Notice (EISPN) for the above referenced project.

During construction and upon completion of the project, any damages/deficiencies to Lauhala Street, Alapai Street, Lisbon Street and Lusitana Street right-of-way shall be corrected to City Standards and accepted by the City and at no cost to the City and County of Honolulu. This will be the responsibility of the selected developer and will be a requirement in the Board of Water Supply's request for proposals (RFP).

Thank you for your participation in this process. Your letter and this response will be reproduced in the Draft EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

Pacific Guardian Center | 733 Bishop Street, Suite 2590 | Honolulu, Hawaii 96813
Telephone: 808.545.2055 | Facsimile: 808.545.2050 | www.hhf.com | email: info@hhf.com

HONOLULU FIRE DEPARTMENT

CITY AND COUNTY OF HONOLULU

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

KIRK CALDWELL
MAYOR

MANUEL P. NEVES
FIRE CHIEF

LIONEL CAMARA JR.
DEPUTY FIRE CHIEF

December 20, 2018

Mr. Scott Ezer
Vice President
HHF Planners
Pacific Guardian Center
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

Dear Mr. Ezer:

Subject: Environmental Impact Statement in Preparation Notice
Board of Water Supply Beretania Street Complex Redevelopment Project
Honolulu, Oahu
Tax Map Keys: 2-1-036: 001 and 2-1-036: 005 (por.)

In response to your letter dated November 19, 2018, regarding the abovementioned subject, the Honolulu Fire Department (HFD) reviewed the material provided and requires that the following be complied with:

1. Fire department access roads shall be provided such that any portion of the facility or any portion of an exterior wall of the first story of the building is located not more than 150 feet from fire department access roads as measured by an approved route around the exterior of the building or facility. (National Fire Protection Association [NFPA] 1; 2012 Edition, Sections 18.2.3.2.2 and 18.2.3.2.2.1.)

   A fire department access road shall extend to within 50 feet of at least one exterior door that can be opened from the outside and that provides access to the interior of the building. (NFPA 1; 2012 Edition, Section 18.2.3.2.1.)

2. A water supply approved by the county, capable of supplying the required fire flow for fire protection, shall be provided to all premises upon which facilities or buildings, or portions thereof, are hereafter

constructed, or moved into or within the county. When any portion of the facility or building is in excess of 150 feet from a water supply on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building, on-site fire hydrants and mains capable of supplying the required fire flow shall be provided when required by the AHJ [Authority Having Jurisdiction]. (NFPA 1; 2012 Edition, Section 18.3.1, as amended.)

3. The unobstructed width and unobstructed vertical clearance of a fire apparatus access road shall meet county requirements. (NFPA 1; 2012 Edition, Section 18.2.3.4.1.1 and 18.2.3.4.1.2, as amended.)

4. Submit civil drawings to the HFD for review.

Should you have questions, please contact Battalion Chief Wayne Masuda of our Fire Prevention Bureau at 723-7151 or wmasuda@honolulu.gov.

Sincerely,

SOCRATES D. BRATAKOS
Assistant Chief

SDB/TC:gl

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VIA EMAIL: wmasuda@honolulu.gov

May 11, 2020

Assistant Chief Socrates D. Bratakos
Honolulu Fire Department
City and County of Honolulu
638 South Street
Honolulu, Hawaiʻi 96813-5007

Dear Chief Bratakos:

Board of Water Supply Beretania Complex Redevelopment
Environmental Impact Statement Preparation Notice (EISPN)
Waikīkī Ahupuaa, Kona District, Island of Oʻahu, TMK: (1) 2-1-036: 001, 004, & 005

Thank you for your letter dated December 20, 2018 in response to the Environmental Impact Statement Preparation Notice (EISPN) for the above referenced project. The project will comply with all fire safety requirements listed, including the provision of fire access roads, adequate water supply for fire protection, and fire apparatus access road with unobstructed width and vertical clearance as noted.

Civil drawings will be submitted to HFD for review during the project's design phase.

Thank you for your participation in this process. Your letter and this response will be reproduced in the Draft EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

Pacific Guardian Center | 733 Bishop Street, Suite 2590 | Honolulu, Hawaii 96813
Telephone: 808.545.2055 | Facsimile: 808.545.2050 | www.hhf.com | email: info@hhf.com

Leslie Kurisaki

From: Ogawa, Seiji <seiji.ogawa@honolulu.gov>
Sent: Tuesday, December 04, 2018 2:02 PM
To: Leslie Kurisaki
Subject: BWS EIS

Hi Leslie,

Can you update me when the Draft EIS is published on OEQC's website. I'd like to follow this project as it goes through this process.

Thank you,

Seiji Ogawa
City and County of Honolulu
Department of Land Management
558 South King Street*
Honolulu, Hawaii 96813
Telephone: 768-4294
Email: seiji.ogawa@honolulu.gov
Web: http://www.honolulu.gov/dlm/home.html
***Please note new address for the Department of Land Management**

--
This message has been scanned for viruses and dangerous content using **Worry-Free Mail Security**, and is believed to be clean. Click here to report this message as spam.

From:	Leslie Kurisaki
To:	Ogawa, Seiji
Cc:	Scott Ezer; Michael Matsuo
Subject:	RE: BWS EIS
Date:	Wednesday, December 5, 2018 9:28:00 AM
Attachments:	image001.png

Hello Mr. Ogawa,
Yes, we will add you to our contact list.

Aloha,
Leslie

Leslie Kurisaki
Associate

HHF PLANNERS
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ofc. 808.545.2055 | dir. 808.457.3182 | fax. 808.545.2050

Pacific Guardian Center, Makai Tower
733 Bishop Street, Suite 2590
Honolulu, Hawai'i 96813
www.hhf.com

From: Ogawa, Seiji [mailto:seiji.ogawa@honolulu.gov]
Sent: Tuesday, December 04, 2018 2:02 PM
To: Leslie Kurisaki <lkurisaki@hhf.com>
Subject: BWS EIS

Hi Leslie,

Can you update me when the Draft EIS is published on OEQC's website. I'd like to follow this project as it goes through this process.

Thank you,

Seiji Ogawa
City and County of Honolulu
Department of Land Management
558 South King Street*
Honolulu, Hawaii 96813
Telephone: 768-4294
Email: seiji.ogawa@honolulu.gov
Web: http://www.honolulu.gov/dlm/home.html
***Please note new address for the Department of Land Management**

DEPARTMENT OF PARKS & RECREATION

CITY AND COUNTY OF HONOLULU

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

KIRK CALDWELL
MAYOR

MICHELE K. NEKOTA
DIRECTOR

JEANNE C. ISHIKAWA
DEPUTY DIRECTOR

November 28, 2018

Mr. Ernest Y. W. Lau, P.E., Manager and Chief Engineer
Board of Water Supply, City and County of Honolulu
630 South Beretania Street
Honolulu, Hawaii 96843

Dear Mr. Lau:

SUBJECT: Environmental Impact Statement Preparation Notice
Redevelopment of Board of Water Supply Beretania Complex
630 South Beretania

HHF Planners has requested our review and comments on the Environmental Impact Statement for the Board of Water Supply's proposed redevelopment of approximately 128,100 square feet of its Beretania Complex.

The Department of Parks and Recreation has no comment. As the proposed project will have no impact on any program or facility of the Department, you may remove us as a consulted party to the balance of the EIS process.

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

Sincerely,

Michele K. Nekota

Michele K. Nekota
Director

MKN:jr
(751800)

cc: Scott Ezer, HHF Planners

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843
www.boardofwatersupply.com

KIRK CALDWELL, MAYOR

BRYAN P. ANDAYA, Chair
KAPUA SPROAT, Vice Chair
KAY C. MATSUI
RAY C. SOON
MAX J. SWORD

ROSS S. SASAMURA, Ex-Officio
JADE T. BUTAY, Ex-Officio

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

ELLEN E. KITAMURA, P.E.
Deputy Manager and Chief Engineer

January 31, 2019

TO: MICHELE K. NEKOTA, DIRECTOR
DEPARTMENT OF PARKS AND RECREATION

FROM: ERNEST Y. W. LAU, P.E., MANAGER AND CHIEF ENGINEER
BOARD OF WATER SUPPLY

SUBJECT: YOUR MEMORANDUM DATED NOVEMBER 28, 2018 REGARDING THE ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE FOR THE BOARD OF WATER SUPPLY BERETANIA COMPLEX REDEVELOPMENT PROJECT, HONOLULU, OAHU, HAWAII

Thank you for submitting comments on the subject Environmental Impact Statement (EIS) Preparation Notice.

We have forwarded your comments to our consultants Architects Hawaii, Ltd. and HHF Planners for consideration. A formal response will be sent to you prior to the publication of the draft EIS, which is scheduled for June 2019.

If you have any questions, please contact Michael Matsuo of our Land Division at 748-5951.

Cc: Keane Kakuda, Architects Hawaii, Ltd.
Scott Ezer, HHF Planners

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VIA EMAIL

May 11, 2020

Ms. Michele K. Nekota, Director
Department of Parks and Recreation
City and County of Honolulu
1000 Uluohia Street, Suite 309
Kapolei, Hawai'i 96707

Dear Ms. Nekota:

Board of Water Supply Beretania Complex Redevelopment
Environmental Impact Statement Preparation Notice (EISPN)
Waikīkī Ahupuaa, Kona District, Island of O'ahu, TMK: (1) 2-1-036: 001, 004, & 005

Thank you for your letter dated November 28, 2018 in response to the Environmental Impact Statement Preparation Notice (EISPN) for the above referenced project. We note that your department has no comment, as the proposed project will have no impact on any program or facility of the Department of Parks and Recreation.

As requested, we will remove the Department of Parks and Recreation as a consulted party for the remainder of the EIS process.

Thank you for your participation in this process. Your letter and this response will be reproduced in the Draft EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 768-8000 • FAX: (808) 768-6041
DEPT. WEB SITE: www.honoluludpp.org • CITY WEB SITE: www.honolulu.gov

KIRK CALDWELL
MAYOR

KATHY K. SOKUGAWA
ACTING DIRECTOR

TIMOTHY F. T. HIU
DEPUTY DIRECTOR

EUGENE H. TAKAHASHI
DEPUTY DIRECTOR

December 6, 2018 2018/ELOG-2253(JY)

Mr. Scott Ezer
HHF Planners
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

Dear Mr. Ezer:

SUBJECT: Request for Comments
Environmental Impact Statement Preparation Notice (EISPN)
Board of Water Supply (BWS) Complex Redevelopment
630 South Beretania Street - Hawaii Capital
Tax Map Key 2-1-036: 001 and 005

This is in response to your letter, received November 20, 2018, requesting comments for the above-mentioned Project. Our preliminary comments are as follows:

1. Special District Permit (Major) will be required for the proposed Project.

2. Conditional Use Permits (Major) will be required for the assisted care living facility and senior rental apartments.

3. Clarify how some of the proposed uses, i.e., commercial parking structure and office building, are permitted in the A-2 Medium Density Apartment District.

4. Discuss how the proposed alternatives will enhance the other buildings and landmarks within the Hawaii Capital Special District and how they will be compatible with and complement the existing BWS buildings and structures.

5. Discuss how the proposed (or retained) landscaping will enhance the park-like setting of the Hawaii Capital Special District including views from

the Punchbowl Lookout. Discuss and show the existing trees six inches or more in caliper to remain, removed, replaced, and/or relocated.

6. Include discussion on off-street parking and vehicular circulation. Proposed parking structures will require vertical form trees and other landscape screening along abutting streets. Rooftop parking and mechanical equipment must be substantially screened from views from the State Capitol Building and Punchbowl lookouts.

7. Discuss how the proposed Project alternatives will comply with the 40 percent open space requirement.

8. Discuss the current nonconforming joint development agreement and how it will be resolved with the proposed Project alternatives. Include discussion on how the existing number of BWS parking stalls (for employee and department vehicles) will be maintained during construction.

9. Describe how the proposed Project alternatives will not visually intrude into the abutting Historic Precinct of the Hawaii Capital Special District.

10. What happened to the proposed photovoltaic (PV) system on steel canopy structures over the existing surface parking lots that were approved on March 13, 2018 (Special District Permit No. 2018/SDD-1)? Will this PV system be incorporated with this Project?

The DPP may have some additional comments when we review the Draft Environmental Impact Statement.

Should you have any questions, please contact Joette Yago, of our Urban Design Branch, at 768-8034 or jyago@honolulu.gov.

Very truly yours,

Anthony X. Ching

FOR Kathy K. Sokugawa
Acting Director

cc: Board of Water Supply, Ernest Lau
Office of the Mayor

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843
www.boardofwatersupply.com

KIRK CALDWELL, MAYOR

BRYAN P. ANDAYA, Chair
KAPUA SPROAT, Vice Chair
KAY C. MATSUI
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MAX J. SWORD

ROSS S. SASAMURA, Ex-Officio
JADE T. BUTAY, Ex-Officio

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

ELLEN E. KITAMURA, P.E.
Deputy Manager and Chief Engineer

January 31, 2019

TO: KATHY K. SOKUGAWA, ACTING DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING

FROM: ERNEST Y. W. LAU, P.E., MANAGER AND CHIEF ENGINEER
BOARD OF WATER SUPPLY

SUBJECT: YOUR MEMORANDUM DATED DECEMBER 6, 2018 REGARDING THE ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE FOR THE BOARD OF WATER SUPPLY BERETANIA COMPLEX REDEVELOPMENT PROJECT, HONOLULU, OAHU, HAWAII

Thank you for submitting comments on the subject Environmental Impact Statement (EIS) Preparation Notice.

We have forwarded your comments to our consultants Architects Hawaii, Ltd. and HHF Planners for consideration. A formal response will be sent to you prior to the publication of the draft EIS, which is scheduled for June 2019.

If you have any questions, please contact Michael Matsuo of our Land Division at 748-5951.

Cc: Keane Kakuda, Architects Hawaii, Ltd.
Scott Ezer, HHF Planners

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VIA EMAIL: jyago@honolulu.gov
kbalassiano@honolulu.gov

May 11, 2020

Ms. Kathy K. Sokugawa, Acting Director
Department of Planning and Permitting
City and County of Honolulu
650 S. King Street, 7th Floor
Honolulu, Hawai'i 96813

Dear Ms. Sokugawa:

Board of Water Supply Beretania Complex Redevelopment
Environmental Impact Statement Preparation Notice (EISPN)
Waikīkī Ahupuaa, Kona District, Island of O'ahu, TMK: (1) 2-1-036: 001, 004, & 005

Thank you for your letter dated December 18, 2018 in response to the Environmental Impact Statement Preparation Notice (EISPN) for the above referenced project. The following is in response to your comments.

1. Special District Permit (Major) will be required for the proposed Project.
2. Conditional Use Permits (Major) will be required for the assisted care living facility and senior rental apartments.

Response: The Draft EIS will indicate that both a Special District Permit (Major) and a Conditional Use Permit (Major) will be required for the redevelopment.

3. Clarify how some of the proposed uses, i.e., commercial parking structure and office building, are permitted in the A-2 Medium Density Apartment District.

Response: The Draft EIS will explain how the uses proposed in the three redevelopment scenarios are permitted in the A-2 Medium Density Apartment District, and/or what permits and approvals are required. Both assisted care living and affordable senior apartments are allowed uses in the A-2 zone. Development of a stand-alone parking structure would be considered a public use, as many of the spaces in the structure would be for government employees. Public uses are allowed in all zoning districts. The parking structure could also be developed as part of a Planned Review Use Permit, also allowed in all zoning districts. The proposed BWS office building is in the category of "Public uses and structures," which are permitted in the A-2 District.

4. Discuss how the proposed alternatives will enhance the other buildings and landmarks within the Hawai'i Capital Special District and how they will be compatible with and complement the existing BWS buildings and structures.

Response: The Draft EIS will discuss the project's compatibility with the design requirements of the Hawai'i Capital Special District. The Project Area is within the Queen's Medical Center Precinct of the Hawai'i Capital Special District. The objective of this precinct is to "minimize any

adverse impact of new medical facilities on the Historic Precinct." The Queen's Medical Center Precinct has a 100-foot height limitation and a 40% open space requirement, and the proposed redevelopment will meet these requirements. It will not adversely impact the buildings, landmarks or views in the Hawaiʻi Capital Special District.

The new structures will, however, have a visual impact. The Draft EIS will include visual simulations illustrating the visual impact on the mauka view corridor between the BWS Public Service Building and Engineering Building, as viewed from South Beretania Street. Potential mitigation measures will be discussed.

5. Discuss how the proposed (or retained) landscaping will enhance the park-like setting of the Hawaiʻi Capital Special District including views from the Punchbowl Lookout. Discuss and show the existing trees six inches or more in caliper to remain, moved, replaced and/or relocated.

Response: The Project Area is currently occupied entirely by paved parking lots, with little existing vegetation. Transformation of the site to a developed use will include landscaping for aesthetics and will therefore enhance the park-like setting of the Project Area and hence the Hawaiʻi Capital Special District. As noted previously, the selected redevelopment scenario will be designed to meet the height and open space requirement of the Hawaiʻi Capital Special District. Visual simulations included in the Draft EIS show that when viewed from the Punchbowl Lookout, all redevelopment scenarios will blend in with surrounding structures with no adverse impact on the view from the lookout.

Existing trees within the Project Area consist of a row of paperbark (*Melaleuca quinquenervia*) trees located along a retaining wall that separates the upper and lower parking lots (of the Ewa Block). There are also two coconut palm trees (*Cocos nucifera*) at the corner of Lisbon and Lusitana Streets, and two at the corner of Lauhala and Lisbon Streets. All of these trees will likely be removed/relocated as part of the redevelopment. Any relocated trees will be included in the landscaping plans for the selected redevelopment scenario.

6. Include discussion of off-street parking and vehicular circulation. Proposed parking structures will require vertical form trees and other landscape screening along abutting streets. Rooftop parking and mechanical equipment must be substantially screened from views from the State Capitol Building and Punchbowl lookouts.

Response: A traffic impact report (TIR) will be prepared for the proposed redevelopment and include discussions regarding off-street parking and vehicular circulation for the redevelopment scenarios. The results of the TIR will be included in the Draft EIS.

The location of proposed parking structures, as well as the project landscape plan, will be determined during the design phase of the redevelopment. Landscape screening will be included as necessary and required. As noted in the response to Comment 5 above, proposed structures within the Project Area will be barely noticeable from the Punchbowl Lookout as shown on the visual simulations in the Draft EIS. All plans for the redevelopment will be reviewed as part of the Special District Permit process.

7. Discuss how the proposed Project alternatives will comply with the 40 percent open space requirement.

Response: The BWS RFP will require that any redevelopment scenario comply with the 40 percent open space requirement and other provisions of the Hawaiʻi Capital Special District. Building siting and orientation on the Project Area, and building design will be used to meet the open space requirement.

8. Discuss the current nonconforming joint development agreement and how it will be resolved with the proposed Project alternatives. Include discussion on how the existing number of BWS parking stalls (employee and department vehicles) will be maintained during construction.

Response: There is no "current nonconforming joint development agreement" in place. The overall BWS Beretania Complex is comprised of three parcels: the "Ewa Block" is comprised of a single parcel, TMK [1] 2-1-036:005. The "Diamond Head Block" is comprised of two parcels: TMK [1] 2-1-036:001 and [1] 2-1-036:004. Currently, the two parcels of the Diamond Head Block are used by BWS for office buildings and parking, and that use will continue and not be part of the redevelopment.

The Project Area for the redevelopment involves two parcels: a portion of TMK [1] 2-1-036:005 (the Ewa Block) and all of [1] 2-1-036:001 (on the Diamond Head Block). According to DPP staff, the current development situation is considered a non-conforming joint development because the pedestrian bridge that crosses Lisbon Street connects both properties. Redevelopment will trigger the requirement to obtain the Joint Development CUP.

A construction phasing plan will be developed prior to construction to ensure that BWS operations will not be disrupted. In addition, adequate parking for BWS employees and vehicles will be maintained on-site or if necessary be provided at an off-site location with shuttles to move employees from the off-site parking lots to the Beretania Complex.

9. Describe how the proposed Project alternatives will not visually intrude into the abutting Historic Precinct of the Hawaiʻi Capital Special District.

Response: The BWS RFP will require that any proposed redevelopment scenario comply with the 100-foot height limit and 40 percent open space requirement of the Queen's Medical Center Precinct of the Hawaiʻi Capital Special District area.

10. What happened to the proposed photovoltaic (PV) system on steel canopy structure over the existing surface parking lots…Will this PV system be incorporated into this Project?

Response: The PV system you refer to is anticipated to be operational by mid-2020. BWS is currently working to connect the PV system to its load centers at the Beretania Complex. Redevelopment of the areas where the PV system is located will not be required to incorporate the existing PV system. he most likely outcome is that BWS will explore relocating the existing

PV panels to its other facilities on O‘ahu. It should be noted that BWS is open to the inclusion of such energy saving systems in the design of the selected redevelopment scenarios.

Thank you for your participation in this process. Your letter and this response will be reproduced in the Draft EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

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

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Mike

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KIRK CALDWELL
MAYOR

SUSAN BALLARD
CHIEF

JOHN D. McCARTHY
JONATHON GREMS
DEPUTY CHIEFS

OUR REFERENCE ATN-DK

February 7, 2019

MEMORANDUM

TO: Ernest Y. W. Lau, P.E., Manager and Chief Engineer
Board of Water Supply

VIA: Susan Ballard, Chief of Police SB 2/8

FROM: Allan T. Nagata, Assistant Chief, Support Services Bureau

SUBJECT: Board of Water Supply – Beretania Complex Redevelopment Project

The Honolulu Police Department (HPD) has reviewed the Environmental Impact Statement Preparation Notice for the Board of Water Supply (BWS) Beretania Complex Redevelopment Project. I appreciate you further discussing this plan with me.

I understand that the proposed project area is bounded by Beretania, Lauhala, Lusitana, and Alapai Streets. Additionally, the future redevelopment site is in close proximity to the Alapai police headquarters.

The HPD is in need of additional parking spaces at its Alapai headquarters for police personnel and specialty vehicles. As such, we are requesting for future consideration in leasing or purchasing parking spaces in the proposed uses for the BWS Beretania Complex Redevelopment Parking Structure. The HPD is requesting 500 parking stalls and is amenable to further discussion.

Please call me at 529-3857 for any questions. Thank you for your time and consideration in this matter.

Thank you!
Chief Ballard

Allan T. Nagata
Assistant Chief
Support Services Bureau

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843
www.boardofwatersupply.com

KIRK CALDWELL, MAYOR

BRYAN P. ANDAYA, Chair
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JADE T. BUTAY, Ex-Officio

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

ELLEN E. KITAMURA, P.E.
Deputy Manager and Chief Engineer

May 17, 2019

TO: SUSAN BALLARD, CHIEF OF POLICE
HONOLULU POLICE DEPARTMENT

ATTN: ALLAN T. NAGATA, ASSISTANT CHIEF
SUPPORT SERVICES BUREAU
HONOLULU POLICE DEPARTMENT

FROM: ERNEST Y. W. LAU, P.E., MANAGER AND CHIEF ENGINEER
BOARD OF WATER SUPPLY

SUBJECT: YOUR MEMORANDUM DATED FEBRUARY 7, 2019, REGARDING THE BOARD OF WATER SUPPLY'S BERETANIA COMPLEX REDEVELOPMENT PROJECT

Thank you for submitting comments on the Environmental Impact Statement Preparation Notice for the Board of Water Supply (BWS) Beretania Complex Redevelopment Project. Please accept our apologies for the delay in responding and thank you for your patience.

We note your request for future consideration for leasing or purchasing of 500 parking stalls in the parking structures that are part of the redevelopment scenarios being evaluated. We will pass this on to our consultants for review and evaluation. Please note, however, that if parking structures are developed at the Beretania Complex, the parking structures would not be under BWS control or management. This being the case, any request to lease or purchase any stalls in the proposed parking structures would have to be made to the parking management contractor/vendor.

If you have any questions, please contact Michael Matsuo of our Land Division at 748-5951.

Cc: Keane Kakuda, Architects Hawaii, Ltd.
Scott Ezer, HHF Planners

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VIA EMAIL: hpdgeneral@honolulu.gov

May 11, 2020

Assistant Chief Allan T. Nagata
Support Services Bureau
Honolulu Police Department
801 South Beretania Street
Honolulu, Hawai‘i 96813

Dear Assistant Chief Nagata:

Board of Water Supply Beretania Complex Redevelopment
Environmental Impact Statement Preparation Notice (EISPN)
Waikīkī Ahupuaa, Kona District, Island of O‘ahu, TMK: (1) 2-1-036: 001, 004, & 005

Thank you for your memorandum to the Board of Water Supply dated February 7, 2019 in response to the Environmental Impact Statement Preparation Notice (EISPN) for the above referenced project.

Your memorandum indicated a need of additional parking spaces for police personnel and specialty vehicles currently stationed at its Alapai headquarters. HPD has expressed interest in leasing or purchasing up to 500 parking stalls in a future parking structure at the Beretania Complex.

The specific land uses at the site, including the number of parking spaces available for lease, will be determined by the selected developer. A stand-alone parking structure utilized by off-site users is one of the development options being evaluated. HPD’s request for 500 parking spaces will be disclosed in the Draft EIS, and this will become part of the official project record forwarded to the future project developer.

Thank you for your participation in this process. Your letter and this response will be reproduced in the Draft EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

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

KIRK CALDWELL
MAYOR

WES FRYSZTACKI
DIRECTOR

JON Y. NOUCHI
DEPUTY DIRECTOR

TP11/18-751929R

December 28, 2018

MEMORANDUM

TO: Ernest Y. W. Lau, P.E., Manager and Chief Engineer
Board of Water Supply

FROM: Wes Frysztacki, Director
Department of Transportation Services

SUBJECT: Environmental Impact Statement (EIS) Preparation Notice for the Board of Water Supply Beretania Complex Redevelopment Project, Honolulu, Oahu, Hawaii

This is in response to a letter that we received from HHF Planners dated November 19, 2018, requesting our review and comments on the subject project. We have the following comments:

1. **Consultation with Adjacent Properties**. Consult with The Queen's Medical Center regarding their long-term redevelopment plans for their facility to assure that it is compatible with this project.

2. **Transportation Impact Assessment (TIA)**. We have the following comments:

   a. The development of 128,100 square feet of property for an assisted care living facility, affordable senior rental apartments, office building, and/or parking structure is estimated to attract more residents, visitors and employees to the site for daily living, commuting, visiting and business activities. A multi-modal TIA should be completed instead of a Traffic Impact Analysis Report to calculate and examine the changes to vehicle, pedestrian, bicycle, and public transit stress levels from each of the alternatives to the surrounding area and nearby intersections with corresponding

improvements to mitigate these impacts by applying Complete Streets principles.

b. Use person and vehicle trip rates from the Institute of Traffic Engineers Trip Generation Manual and assign these trips to the transportation system. This will require analysis of crossing treatments using National Cooperative Highway Research Program 562 methodology for pedestrian measures.

c. The calculated and observational Level of Service (LOS) should be provided.

d. Define performance measures for use in the study:

   i. V/C ratio targets that are >1 for 1st and/or 2nd highest peak hours;
   ii. Identify where vehicle LOS will not be used;
   iii. Pedestrian LOS;
   iv. Bicycle Level of Traffic Stress; and
   v. Transit Capacity and Quality of Service

3. **Pedestrian and Bicycle Facilities**. A pedestrian and bicycle plan for the facility should be provided that includes internal pedestrian and bicycle sidewalks and paths for the property and how they connect to the external streets.

4. **Parking and Service Strategy.**

a. All parking needs for the proposed facility should be handled on-site.

b. The number of parking spaces shall be justified and consistent with the trip generation method used in the TIA.

c. The Department of Transportation Services (DTS) requires a Shared Parking Analysis, based on the Urban Land Institute Shared Parking model, and a shared parking strategy. The analysis should include a qualitative description of how the Applicant will monitor and manage opportunities for shared parking between the various users (residents, employees and visitors) of the parking structure.

d. The Applicant shall also provide a strategy whereby a percentage of parking is separated from the lease or purchase transaction for the primary use (unbundled parking). Parking shall be rented or obtained through a separate purchase transaction when the unit is bought or rented. This increases housing affordability for households that do not use parking.

e. The DTS recommends project designs that wrap structured parking with residential units or commercial floor area to maintain an active street frontage and pedestrian experience. Any unconcealed portions of garages should have enhanced landscape or other screening treatments.

f. Vehicle parking ramps should be designed to accommodate demands so that vehicles will not queue onto adjacent roadways and obstruct traffic flow.

5. **Traffic Management Plan (TMP).** A TMP should be prepared for this project that is jointly reviewed and accepted by the DTS and the Department of Planning and Permitting. The TMP shall include the following:

a. A discussion of the traffic impacts that the project may have on any surrounding City roadways and facilities, including short-term impacts during construction and long-term impacts after construction with corresponding measures to mitigate these impacts by applying Complete Streets principles.

b. Transportation Demand Management strategies to minimize the amount of vehicular trips to the site.

c. Construction materials and equipment should be transferred to and from the project site during off-peak traffic hours (8:30 a.m. to 3:30 p.m.) to minimize any possible disruption to traffic on the local streets.

d. Inform residents, employees and visitors of the City's vanpool, car share and bikeshare programs to promote alternate modes of transportation. Provide reserved parking for carpool and vanpool vehicles on-site.

e. Consider providing subsidized transit passes to residents and employees to encourage use of public transit.

f. Best practice TMPs provide the City with information by which to monitor construction areas. The City will require cameras where sidewalks are closed to help assess effectiveness of management.

g. Coordinate construction schedules with other nearby properties that have planned developments to ensure minimal impacts on City streets.

6. **Complete Streets.** The application should contain discussion of compliance with the County and State Complete Streets policies, pursuant to Act 54, Session Laws of Hawaii 2009, HRS §264-20.5 and ROH 12-15. The Project should elaborate on how it will comply with Complete Streets policies, including specific adherence to the following key Complete Streets principles: safety, Context Sensitive Solutions, accessibility and mobility for all, use and comfort of all users, consistency of design guidelines and standards, energy efficiency, and health and green infrastructure.

7. **Bike and Moped Parking**. On-site bike racks and secure moped parking for the employees and visitors should be included and located on the site plan.

8. **Driveway Design**. All access driveways to the project site should be designed with the highest pedestrian and bicycle safety measures and constructed to current City standards.

9. **Loading and Unloading**.

a. All loading and unloading needs, including service delivery and refuse vehicles should be handled on-site, rather than on City roadways.

b. The project should be designed to accommodate TheHandi-Van para-transit vehicles on-site, which require a minimum 31-foot turning radius, a 10-foot, 6-inch height clearance, and the ability to exit the area without reversing.

10. **Priority Guidelines on Sustainability.** In addressing priority guidelines on sustainability through HRS § 226-108, the Project should consider certification by a green building rating system, including but not limited to nationally recognized rating systems such as Leadership in Energy and Environmental Design (LEED), the Living Building Challenge, Green Globes, or another comparable State-approved, nationally recognized, and consensus-based guideline, standard, or system.

    The DTS supports certification such as the LEED for Building Design and Construction Version 4.0 as it mitigates Location and Transportation (LT) impacts including but not limited to: minimizing the environmental harms associated with parking facilities, including automobile dependence, land consumption, and rainwater runoff; reducing pollution by promoting alternatives to conventionally fueled automobiles; increasing access to quality transit; reducing Vehicle Miles Traveled (VMT) through the integration of bicycle facilities; and compact, walkable development that encourages a density and diversity of surrounding uses.

11. **Roadway, Sidewalk and Crosswalk Closures**. If there are any roadway, sidewalk or crosswalk closures, alternate routes should be provided for vehicles, pedestrians, and bicyclists that are safe and clearly marked.

12. **Vehicle/Pedestrian Crossing**. Any existing pedestrian, bicycle and vehicle access/crossing shall be maintained with the highest safety measures during construction.

13. **Best Management Practice (BMP) Controls**. BMP controls should be included at the construction site to prevent trailing of dirt, debris, and contaminated water or material that is being removed from the site onto City roadways.

14. **Roadway Damage**. Any damage to the existing roadway and sidewalk area caused by the project should be repaired to current City standards as well as meet ADA requirements.

15. **Neighborhood Impacts**. The area representatives, neighborhood board, as well as the area residents, businesses, emergency personnel (fire, ambulance, and police), Oahu Transit Services, Inc. (TheBus and TheHandi-Van), etc., should be kept apprised of the details and status throughout the project and the impacts that the project may have on the adjoining local street area network.

16. **Street Usage Permit**. A street usage permit from the DTS should be obtained for any construction-related work that may require the temporary closure of any traffic lane on a City street.

17. **Disability and Communication Access Board (DCAB)**. Project plans (interior and exterior layouts, vehicular and pedestrian circulation, sidewalks, parking and pedestrian pathways, vehicular ingress/egress, etc.) should be reviewed and approved by DCAB to ensure full compliance with ADA requirements.

We reserve further comment pending review of the Draft EIS.

Thank you for the opportunity to review this matter. Should you have any questions, please contact Renee Yamasaki of my staff at 768-8383.

cc: The Honorable Kirk Caldwell, Mayor
Mr. Scott Ezer, HHF Planners

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843
www.boardofwatersupply.com

KIRK CALDWELL, MAYOR

BRYAN P. ANDAYA, Chair
KAPUA SPROAT, Vice Chair
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MAX J. SWORD

ROSS S. SASAMURA, Ex-Officio
JADE T. BUTAY, Ex-Officio

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

ELLEN E. KITAMURA, P.E.
Deputy Manager and Chief Engineer

January 31, 2019

TO: WES FRYSZTACKI, DIRECTOR
DEPARTMENT OF TRANSPORTATION SERVICES

FROM: ERNEST Y. W. LAU, P.E., MANAGER AND CHIEF ENGINEER
BOARD OF WATER SUPPLY

SUBJECT: YOUR MEMORANDUM DATED DECEMBER 28, 2018 REGARDING THE ENVIRONMENTAL IMPACT STATEMENT PREPARATION NOTICE FOR THE BOARD OF WATER SUPPLY BERETANIA COMPLEX REDEVELOPMENT PROJECT, HONOLULU, OAHU, HAWAII

Thank you for submitting comments on the subject Environmental Impact Statement (EIS) Preparation Notice.

We have forwarded your comments to our consultants Architects Hawaii, Ltd. and HHF Planners for consideration. A formal response will be sent to you prior to the publication of the draft EIS, which is scheduled for June 2019.

If you have any questions, please contact Michael Matsuo of our Land Division at 748-5951.

Cc: Keane Kakuda, Architects Hawaii, Ltd.
Scott Ezer, HHF Planners

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VIA EMAIL: csuliven@honolulu.gov

May 11, 2020

Mr. Wes Frysztacki, Director
Department of Transportation Services
City and County of Honolulu
650 S. King Street
Honolulu, Hawai'i 96813

Dear Mr. Frysztacki:

Board of Water Supply Beretania Complex Redevelopment
Environmental Impact Statement Preparation Notice (EISPN)
Waikīkī Ahupuaa, Kona District, Island of O'ahu, TMK: (1) 2-1-036: 001, 004, & 005

Thank you for your memorandum to BWS dated December 28, 2018 in response to the Environmental Impact Statement Preparation Notice (EISPN) for the above referenced project. The following are responses to your comments:

1. Consultation with Adjacent Properties. Consult with the Queen's Medical Center regarding their long-term redevelopment plans for their facility to assure that it is compatible with this project

Response: Queen's Medical Center (QMC) is on the list of consulted parties for the EIS process and they received a copy of the EISPN. No comments have been received, but representatives from QMC attended the November 8, 2018 community information meeting at Central Middle School.

2. Transportation Impact Assessment (TIA).

a. A multi-modal TIA should be completed instead of a Traffic Impact Analysis Report to calculate and examine the changes to vehicle, pedestrian, bicycle, and public transit stress levels from each of the alternatives to the surrounding area and nearby intersections with corresponding improvements to mitigate these impacts by applying Complete Streets principles…
b. Use person and vehicle trip rates from the Institute of Traffic Engineers Trip Generation Manual…
c. …provide calculated and observational Level of Service…
d. Define performance measures for use in the study…

Response: The Draft EIS will include a Traffic Impact Report (TIR). The preparation of a multi-modal TIA, as you describe, requires specific details about improvements to the existing pedestrian, bicycle, and transit facilities planned in conjunction with the proposed redevelopment. This information is not available at present.

BWS intends to issue a Request for Proposals (RFP) for the redevelopment of the Beretania Complex site, and the final redevelopment proposal will be determined by the selected developer. The Draft EIS evaluates three redevelopment scenarios, all of which are allowed under the existing A-2 Medium Density Apartment zoning. However, specific land uses, building placement, and other site improvements will be up to the selected developer. There is also the possibility that the selected developer could choose to rezone the property, thereby allowing the potential for additional redevelopment scenarios.

Your comments will be transmitted to prospective developers through the EIS document, which will disclose DTS's concerns, and include a copy of your December 28, 2018 memorandum. The RFP issued by BWS will also state that the project must meet all government regulations and any conditions associated with land use entitlements.

3. Pedestrian and Bicycle Facilities. A pedestrian and bicycle plan for the facility should be provided that includes internal pedestrian and bicycle sidewalks and paths for the property and how they connect to the external streets.

Response: Similar to the above, this issue is more appropriately addressed during the project design phase, after a developer is selected and a development proposal finalized. These requirements can be evaluated when the final redevelopment project applies for a Hawaiʻi Capital Special District Permit (Major).

4. Parking and Service Strategy.

a. All parking needs should be handled on-site
b. Number of parking spaces shall be justified and consistent with trip generation method used in the TIA
c. DTS requires Shared Parking Analysis…include a qualitative description of how the Applicant will monitor and manage opportunities for shared parking between the various users…
d. Applicant shall also provide a strategy where a percentage of parking is separated from the lease or purchase transaction for the primary use (unbundled parking). Parking shall be rented or obtained through a separate purchase transaction when the unit is bought or rented. This increases housing affordability for households that do not use parking.
e. DTS recommends project designs that wrap structured parking with residential units or commercial floor area to maintain an active street frontage and pedestrian experience…any unconcealed portions of garages should have enhanced landscape or other screening treatments.
f. Vehicle parking ramps should be designed to accommodate demands so that vehicles will not queue onto adjacent roadways and obstruct traffic flow

Response: All redevelopment scenarios presented in the Draft EIS accommodate parking needs on site. This will be a requirement of the RFP. The number of parking spaces will depend on the final redevelopment proposal, which will be determined by the selected developer. The RFP will require that Shared Parking Analysis, parking strategy, design of structured parking (items 4c, 4d, 4e, 4f) be addressed during the design phase.

5. Traffic Management Plan (TMP). A TMP should be prepared for this project that is jointly reviewed and accepted by the DTS and the Department of Planning and Permitting.

a. A discussion of project traffic impacts on surrounding City roadways and facilities, including short-term impacts during construction and long-term impacts after construction with corresponding measures to mitigate these impacts by applying Complete Streets principles.
b. Transportation Demand Management strategies to minimize amount of vehicular trips…
c. Construction materials and equipment transferred to and from the project site during off-peak hours…
d. Inform residents, employees and visitors of City's vanpool, car share and bike share programs to promote alternative modes of transportation. Provide reserved parking for carpool and vanpool vehicles on site.
e. Consider subsidized transit passes to residents and employees
f. Best practice TMPs provide City with information to monitor construction areas. City will require cameras where sidewalks are closed…
g. Coordinate construction schedules with other nearby properties that have planned developments to ensure minimal impacts on City streets…

Response: The Traffic Impact Report (TIR) included in the Draft EIS will discuss traffic impacts associated with the three potential redevelopment scenarios (Item 5a). The Draft EIS will explain that a Traffic Management Plan (TMP) will be prepared by the selected developer, based on the final redevelopment plan. Items 5c and 5g will be included in a standard Construction Management Plan for the final redevelopment project.

Items 5d and 5e, which pertain to the long-term operation of the site, are included in a standard Traffic Management Plan. They will be implemented by BWS for its existing employees and for the future BWS office building.

6. Complete Streets. Include discussion of compliance with Complete Streets policies...how project will comply with policies and principles…

Response: The County and State Complete Streets policies and project compliance will be discussed in the Draft EIS.

7. Bike and Moped Parking. On-site bike racks and secure moped parking for employees and visitors should be included and located on site plan.

Response: The development scenarios presented in the Draft EIS are conceptual and intended to estimate the magnitude of environmental impact. Detailed site plans, including the location of bike racks and moped parking, will be prepared during the design phase. The BWS RFP will specify that bike racks and moped parking shall be provided in the redevelopment plan as practical and necessary.

8. Driveway Design. All access driveways to the project site should be designed with the highest pedestrian and bicycle safety measures and constructed to City standards.
9. Loading and Unloading.

a. All loading and unloading needs …should be handled on site
b. Project should be designed to accommodate The Handi-Van paratransit vehicles on site…

10. Priority Guidelines on Sustainability. Project should consider certification by a green building rating system…
11. Roadway, Sidewalk and Crosswalk Closures. If there are any roadway, sidewalk or crosswalk closures, alternative routes should be provided…
12. Vehicle and Pedestrian Crossing. Any existing pedestrian, bicycle and vehicle access/crossing shall be maintained during construction…
13. Best Management Practices (BMP) Controls. BMP controls should be included at the construction site…
14. Roadway Damage. Any damage to exiting roadway and sidewalk caused by the project should be repaired to current City standards as well as meet ADA requirements…

Response: Comments 8, 9, 10, 11, 12, 13 and 14 are acknowledged and will be met. The selected developer will determine land use and final designs, including the location of access driveways, loading and unloading areas, pedestrian paths, etc. The selected developer will prepare and implement a construction BMP plan and will be responsible for any roadway or sidewalk damage as a result of construction. Your memo of December 28, 2018 and concerns will be included in the EIS and provided to prospective developers as part of the RFP.

15. Neighborhood Impacts. The area representatives, neighborhood board, as well as the area residents, businesses, emergency personnel (fire, ambulance, and police), Oahu Transit Services, Inc. (TheBus and TheHandi-Van), etc., should be kept apprised of the details and status throughout the project and the impacts that the project may have on the adjoining local street area network

Response: Area representatives, Downtown-Chinatown Neighborhood Board, nearby residents, and public service providers (police, fire) are consulted parties in the EIS process. The RFP will require the selected developer to provide notification to surrounding residents and businesses during the construction phase.

16. Street Usage Permit. A street usage permit from DTS should be obtained for any construction related work that may require temporary closure of any traffic lane on a City street.
17. Disability and Communication Access Board. Project plans should be reviewed and approved by DCAB to ensure full compliance with ADA requirements.

Response: The selected developer will be required to obtain a street usage permit for any construction related work requiring temporary lane closures. The selected developer will also be responsible for DCAB review and approval of project plans to ensure compliance with the Americans with Disabilities Act.

Thank you for your participation in this process. Your memo and this response will be reproduced in the Draft EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

HISTORIC HAWAI'I FOUNDATION

December 13, 2018

The Honorable Kirk Caldwell
Mayor, City and County of Honolulu
c/o Board of Water Supply
630 S. Beretania Street
Honolulu, HI 96843

Via Email: bwsredevelopmenteis@hhf.com

Re: Board of Water Supply Beretania Complex Redevelopment Project;
Environmental Impact Statement Preparation Notice (EISPN)
Honolulu, Island of O'ahu
TMK: [1] 2-1-036: 001 & 005 (por)

Dear Mayor Caldwell:

Historic Hawai'i Foundation (HHF) is providing comment on the EISPN for the Board of Water Supply (BWS) Beretania Complex Redevelopment Project under Hawai'i Revised Statutes (HRS) Chapter 343. HHF reviewed the notice of November 23, 2018 opening the public comment period and containing the scope of work and attached exhibits.

Historic Hawai'i Foundation is a statewide organization established in 1974 to encourage the preservation of sites, buildings, structures, objects and districts that are significant to the history of Hawai'i. HHF is an organization with a demonstrated interest in the undertaking and a concern for the effects on historic properties.

Project Scope

Under the proposed action, BWS will issue a Request for Proposal (RFP) for a development partner to redevelop of a portion of the Beretania Street Complex. The Project Area does not include the existing BWS Public Service Building, Engineering Building, and Pump Station Building. The selected developer will be issued a ground lease for the use of the Project Area, and will be allowed to redevelop the Project Area, subject to the conditions of the lease [EISPN 3.0].

Historic Hawai'i Foundation is pleased to see that the Board of Water Supply has reduced the project area to those portions of the property covered with surface parking, thus avoiding the historic structures on the makai portions of the property. HHF agrees with the project limits and the exclusion of the known historic buildings from the redevelopment site.

680 Iwilei Road, Suite 690 Honolulu, Hawai'i 96817 Tel (808) 523-2900 Fax (808)523-0800
Email preservation@historichawaii.org Web www.historichawaii.org

Undertaking

The Project Area is limited to portions of the BWS Beretania Complex that are currently used for parking. The specific redevelopment plan will be determined by the lessee. The DEIS will evaluate three potential development scenarios, any of which could be implemented under existing zoning and appear to be supported by market conditions. The scenarios are:

- Scenario 1: Assisted Care Living Facility and Office Building
- Scenario 2: Affordable Senior Rental Apartments and Office Building
- Scenario 3: Parking Structure and Office Building

All three scenarios show a new BWS office building (10 stories), including several stories of parking, near the corner of Lusitana Street and Alapai Street. All scenarios also include a larger multi-level parking structure between Lisbon and Lauhala Streets. This structure will replace lost ground level parking and support the proposed residential uses. The number of parking stalls varies by scenario.

Project Area: The project area is currently described as the development parcels. HHF recommends that a larger area of potential effect also be included in the DEIS in order to adequately assess off-site impacts, if any, to historic, cultural, and natural resources. These may include visual or contextual effects on the larger Capital Special District, as well as the adjacent historic BWS buildings.

The BWS Beretania Complex site is included in the City and County of Honolulu Hawai'i Capital Special District. The Board of Water Supply Buildings are listed as contributing to the District [ROH Sec. 21-9.30-3 (c)]. The study area is located within the Special District's sub-district, titled "Queens Medical Center Precinct."

The BWS Beretania Complex site is also adjacent to the Hawai'i Capital Historic District, which is listed on the National Register of Historic Places, containing 20 significant contributing historic properties.

Identification of Historic Resources: The EISPN states that the Project Area is entirely paved and that there are no historic architecture resources [EISPN Section 5.2.1.2].

However, other documentation exists that indicate that underground tunnels and a bomb shelter were built during World War II (c. 1942) on the BWS site. The existence of all or part of the reported tunnel system needs to be investigated and confirmed in the field, as it is unclear if the tunnel system is wholly or partially underlying the project area or is underneath one of the existing buildings or streets.

Please include the location, condition and whether the tunnel system is still extant in the assessment of historic resources in the DEIS, and how the project will avoid or preserve these resources.

The project area also includes known and likely Native Hawaiian burials. The EISPN notes that a Burial Treatment Plan is complete and will be followed by the developer. Further archaeological assessment and treatment will be delayed until the specific development plan is proposed.

HHF is concerned that conducting the archaeological survey after selecting a development scheme would preclude planning efforts to avoid or minimize effects on archaeological resources. It would be prudent to identify sensitive areas and key locations to be avoided or preserved during the planning of the redevelopment, rather than conducting an after-the-fact assessment.

Therefore, HHF recommends conducting, at minimum, a reconnaissance-level survey to identify probable subsurface cultural resources prior to selecting locations for new buildings.

There are, additionally, historic buildings within the overall Beretania Complex, which according to BWS have been previously evaluated by Mason Architects, Inc. The proposed action does not include modification of these existing buildings [EISPN Section 5.2.1.2].

- The BWS Engineering Building was designed by the architectural firm of Wood, Weed, and Associates and was constructed in 1939.
- The Public Service Building houses the BWS's main offices. This historic structure was designed by architect Hart Wood and was constructed in 1958.
- The BWS's iconic Pump Station Building, which fronts South Beretania Street, was designed by the architectural firm of Wood, Weed, and Associates. Construction was started on this building in 1927 and completed by 1939.

HHF recommends that the DEIS technical appendices also include the Mason Architects' architectural inventory survey of the historic properties for reference.

Determination of Effect: The DEIS will discuss the project's potential impact on architectural, archaeological and cultural resources and, if necessary, recommend avoidance, minimization and mitigation measures.

HHF notes that existing special district guidelines address design and development parameters for new construction. These bulk, mass, setback and other standards need to be followed to avoid additional effects on the setting of the historic buildings and district.

Additional measures to protect historic resources could include commitments to prepare and follow a Preservation Plan for the three historic BWS buildings, treatment guidelines for the WWII Tunnels, and potentially other measures to provide historic interpretation on the site to educate future residents and visitors about its historic and cultural significance.

Thank you for the opportunity to comment on the EISPN for the Board of Water Supply Complex and potential effects on adjacent historic buildings, cultural resources and the Capital District.

Very truly yours,

Kiersten Faulkner, AICP
Executive Director

Copies via email:

Board of Water Supply:	Ernest Y. W. Lau, P.E., Manager and Chief Engineer, bwsredevelopmenteis@hhf.com
HHF Planners:	Scott Ezer, Vice President, HHF Planners bwsredevelopmenteis@hhf.com
SHPD:	Alan Downer, Susan Lebo

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VIA EMAIL: kiersten@historichawaii.org

May 11, 2020

Ms. Kiersten Faulkner, AICP
Executive Director
Historic Hawai'i Foundation
680 Iwilei Road, Suite 690
Honolulu, HI 96817

Dear Ms. Faulkner:

Board of Water Supply Beretania Complex Redevelopment
Environmental Impact Statement Preparation Notice (EISPN)
Waikīkī Ahupuaa, Kona District, Island of O'ahu, TMK: (1) 2-1-036: 001, 004, & 005

Thank you for your letter to Mayor Kirk Caldwell dated December 28, 2018 in response to the Environmental Impact Statement Preparation Notice (EISPN) for the above referenced project. We offer the following responses to your comments:

Comment: Historic Hawai'i Foundation is pleased to see that BWS has reduced the project area to those portions of the property covered with surface parking, thus avoiding the historic structures…

Response: Comment acknowledged.

Comment: Please include the location, condition and whether the tunnel system is still extant in the assessment of historic resources in the DEIS, and how the project will avoid or preserve these resources.

Response: The Historic Resources Evaluation conducted by Mason Architects (July 2019) identified the underground bomb shelter and tunnel system as an existing historic resource within the project's Area of Potential Effect. The tunnel system is located under the Engineering Building and the rear driveway, although the extent and precise location are presently unknown. The Historic Resources Evaluation noted that construction of a future 10-story BWS office building and parking structure behind the Engineering Building has the potential to damage or demolish this historic resource. Their recommendation is for the selected developer to map the underground tunnel system as part of the project's design phase, and to avoid damage to the tunnels to the extent possible. The findings will be submitted to the State Historic Preservation Division (SHPD). The extent of the project's impact will depend on the location of the tunnel and the proposed location and design of the new BWS building and parking structure. Appropriate mitigation may be required by the SHPD.

Comment: The Project Area also includes known and likely Native Hawaiian burials…HHF is concerned that conducting the archaeological survey after selecting a development scheme would preclude planning efforts to avoid or minimize effects on archaeological resources. It would be prudent to identify sensitive areas and key locations to be avoided or preserved during the planning of the redevelopment, rather than conducting an after-the fact assessment. Therefore HHF recommends conducting, at minimum, reconnaissance-level survey to identify probably subsurface cultural resources prior to selecting locations for new buildings.

Response: A reconnaissance level survey of the entire Project Area was conducted as part of the Literature Review and Field Inspection (LRFI) by Cultural Surveys Hawaiʻi. The findings will be presented in the Draft EIS. The selected developer will be required to conduct an Archaeological Inventory Survey (AIS), with subsurface testing of areas not previously investigated, during the project design phase. The location and number trenches will depend on the proposed location and design of structures. Future design of the actual development would be guided by the results of this future AIS.

Comment: HHF recommends that the DEIS technical appendices also include the Mason Architects' archaeological inventory survey of the historic properties for reference.

Response: We believe the study you refer to is a 2017 AIS prepared by Pacific Consulting Services, Inc. for a BWS Energy Savings Project that involved the installation of photovoltaic (PV) panels in the parking lot behind the Public Service Building. The Area of Potential Effect (APE) for the 2017 AIS included the Ewa Block of the current Project Area, but did not include the portion of the Diamond Head Block behind the Engineering Building, where the BWS Office Building is proposed. The 2017 AIS will be included in the Draft EIS appendix, as requested.

Comment: Determination of Effect. ...HHF notes that existing special district guidelines address design and development parameters for new construction. These bulk, mass, setback and other standards need to be followed to avoid additional effects on the setting of the historic buildings and district.

Response: Your comment is acknowledged. The selected developer will be required to comply with the standards and guidelines for the Hawaiʻi Capital Special District's Queen's Medical Center Precinct, where the Project Area is located. This requirement will be stated in the RFP.

Comment: Additional measures to protect historic resources could include commitments to prepare and follow a Preservation Plan for the three historic BWS buildings, treatment guidelines for the WWII Tunnels, and potentially other measures to provide historic interpretation on the site to educate future residents and visitors about its historic and cultural significance.

Response: Your comment is acknowledged. Possible impacts and mitigation measures have been identified in the Historic Resources Evaluation and will be discussed in the Draft EIS. Appropriate mitigation measures, possibly including a Preservation Plan, will be based on the final development proposal, and developed in consultation with SHPD.

Thank you for your participation in this process. Your memo and this response will be reproduced in the Draft EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

LN-1211
181532
mgr
Rep
Land
cc: Comm.

Lorraine Lee

From: David Rezachek <rezachekd001@hawaii.rr.com>
Sent: Wednesday, November 14, 2018 3:30 PM
To: Communications; Ernest Lau; Board of Water Supply Board of Directors; andaya@hbws.org; ksproat@hbws.org; kmatsui@hbws.org; Ellen E. Kitamura; rasoon@hbws.org; jbutay@hbws.org
Subject: Attn: Construction Section - Opposition to Proposed Board of Water Supply, Beretania Complex Redevelopment

Mr. Ernest Y. W. Lau, P.E.
Manager & Chief Engineer
Board of Water Supply
City and County of Honolulu
630 South Beretania Avenue
Honolulu, HI 96813

Dear Mr. Lau,

I plan to express my strong opposition to all of the alternative designs for the proposed Board of Water Supply, Beretania Complex Redevelopment project in any forum where it is discussed.

While such a project may have the potential to "generate lease revenue and offset a portion of costs for [BWS] operations and capital improvement program," the impacts on area residents will be nothing but negative.

I will also be encouraging other residents of Lunalilo Tower (710 Lunalilo St.) and neighboring residences and businesses to oppose this project.

I will also be contacting the mayor, the city council, and state representatives to inform them of my opposition and to ensure that I am notified of any future hearings and meetings involving this project.

Please place me on the distribution list for review and comment on any DEIS, EIS, permit applications, and any other notifications regarding this project so that I can continue to express my strong opposition.

Sincerely,

Dr. David Rezachek, P.E.
710 Lunalilo St., Apt. 1107
Honolulu, HI 96813
Cell Phone: (808) 282-5594
Telephone: (808) 524-1954
Email: rezachekd001@hawaii.rr.com

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VIA EMAIL: rezachekd001@hawaii.rr.com

May 11, 2020

Dr. David Rezachek, P.E.
710 Lunalilo Street, Apartment 1107
Honolulu, HI 96813

Dear Dr. Rezachek:

Board of Water Supply Beretania Complex Redevelopment
Environmental Impact Statement Preparation Notice (EISPN)
Waikīkī Ahupuaa, Kona District, Island of O'ahu, TMK: (1) 2-1-036: 001, 004, & 005

Thank you for your email to the Board of Water Supply sent November 14, 2018 in response to the Environmental Impact Statement Preparation Notice (EISPN) for the above referenced project. We note your opposition to all of the alternative designs for the proposed project, and your comment that "the impacts on area residents will be nothing but negative."

As requested, we have added you to the project mailing list. You will be notified when the Draft EIS is available, and be informed of opportunities for public input throughout the environmental review process.

Thank you for your participation in this process. Your memo and this response will be reproduced in the Draft EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

DEIS Comment Letters

DAVID Y. IGE
GOVERNOR

CURT T. OTAGURO
COMPTROLLER

AUDREY HIDANO
DEPUTY COMPTROLLER

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

(P) 20.100

JUN 17 2020

Mr. Ernest Y. W. Lau, P.E.
Manager and Chief Engineer
Board of Water Supply
City and County of Honolulu
630 South Beretania Street
Honolulu, Hawaii 96843

Dear Mr. Lau:

Subject: Board of Water Supply Beretania Complex Redevelopment Project
Kona District, Island of Oahu
TMK: (1) 2-1-036:001 and 2-1-036:005 (portion)

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (EIS) for the subject project.

As we noted in our response to your request for comments at the EIS Preparation Notice stage, the subject project does not appear to directly impact any Department of Accounting and General Services-managed facilities, and we have no comments to offer at this time. However, we do intend to continue to monitor this project as it develops, given its proximity to several of our facilities.

If you have any questions, please have your staff call Mr. Dennis Chen of the Planning Branch at 586-0491.

Sincerely,

CHRISTINE L. KINIMAKA
Public Works Administrator

DYKC:mo
c: The Honorable Kirk Caldwell, Mayor
Mr. Scott Ezer, HHF Planners

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VIA EMAIL: Chris.kinimaka@hawaii.gov
Dennis.yk.chen@hawaii.gov

August 4, 2020

Ms. Christine L. Kinimaka
Public Works Administrator
State of Hawaiʻi
Department of Accounting and General Services
P.O. Box 119
Honolulu, Hawaiʻi 96810-0119

Dear Ms. Kinimaka:

Board of Water Supply Beretania Complex Redevelopment
Draft Environmental Impact Statement
Waikīkī Ahupuaʻa, Kona District, Island of Oʻahu
TMK: (1) 2-1-036: 001 and 005 (portion)

Thank you for your letter dated June 17, 2020 in response to the Draft Environmental Impact Statement (DEIS) for the above referenced project. We acknowledge your comment that the subject project does not appear to directly impact any Department of Accounting and General Services-managed facilities and that you have no comments to offer at this time. We note that DAGS will continue to monitor this project as it develops, given its proximity to several DAGS facilities.

Thank you for your participation in this process. Your letter and this response will be reproduced in the Final EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

From: Cab General
To: BWS Redevelopment EIS; Scott Ezer
Subject: DOH Clean Air Branch Comments on Draft EIS for BWS Beretania Complex Redevelopment
Date: Tuesday, May 26, 2020 11:30:08 AM

[This message was sent from an outside source.]
Aloha

Thank you for the opportunity to provide comments on the subject project.
Please see our standard comments at:
https://health.hawaii.gov/cab/files/2019/04/Standard-Comments-Clean-Air-Branch-2019.pdf

Please let me know if you have any questions.

Barry Ching
Clean Air Branch
Hawaii Department of Health
(808) 586-4200

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VIA EMAIL: Cab.General@doh.hawaii.gov

August 4, 2020

Mr. Barry Ching
Clean Air Branch
State of Hawai'i Department of Health
P.O Box 3378
Honolulu, HI 96801

Dear Mr. Ching:

Board of Water Supply Beretania Complex Redevelopment
Draft Environmental Impact Statement
Waikīkī Ahupua'a, Kona District, Island of O'ahu
TMK: (1) 2-1-036: 001 and 005 (portion)

Thank you for your email sent May 26, 2020 in response to the Draft Environmental Impact Statement (DEIS) for the above referenced project. The Clean Air Branch standard comments you referenced will be consulted.

Thank you for your participation in this process. Your letter and this response will be reproduced in the Final EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

Pacific Guardian Center | 733 Bishop Street, Suite 2590 | Honolulu, Hawaii 96813
Telephone: 808.545.2055 | Facsimile: 808.545.2050 | www.hhf.com | email: info@hhf.com

DAVID Y. IGE
GOVERNOR OF HAWAII

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

July 07, 2020

LD 515e

Ernest Y.W. Lau, P.E., Manager and Chief Engineer
Board of Water Supply
City & County of Honolulu
630 South Beretania Street *via email: bwsredevelopmenteis@hhf.com*
Honolulu, HI 96843

Dear Mr. Lau:

SUBJECT: **Board of Water Supply Beretania Complex Redevelopment Project, Kona District, Island of Oahu, TMK: (1) 2-1-036:001 & 2-1-036:005 (portion)**

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement for the subject project. The Land Division of the Department of Land and Natural Resources (DLNR) distributed copies of your request to DLNR's various divisions for their review and comment.

Enclosed are responses from our (a) Engineering Division and (b) Land Division. If you have any questions, please feel free to contact Barbara Lee via email at barbara.j.lee@hawaii.gov. Thank you.

Sincerely,

Russell Tsuji

Russell Y. Tsuji
Land Administrator

Enclosure(s)
cc: Central Files
Mayor Kirk Caldwell, City & County of Honolulu *via email: bwsredevelopmenteis@hhf.com*
Scott Ezer, Vice President, HHF Planners *via email: bwsredevelopmenteis@hhf.com*

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May 18, 2020

Dear Participant:

Name of Project: Board of Water Supply Beretania Complex Redevelopment Project
Island and District: Kona District, Island of Oahu
Tax Map Key: [1] 2-1-036:001 & 2-1-036:005 (portion)

We are informing you that the Board of Water Supply, City and County of Honolulu (BWS) has prepared a Draft Environmental Impact Statement (DEIS) for its Beretania Complex Redevelopment Project. The BWS intends to issue Request for Proposals to redevelop approximately 128,100 square feet of its Beretania Complex located at 630 South Beretania Street, Honolulu. The purpose of the proposed action is to provide a revenue stream to help offset a portion of BWS's operating expenses and capital improvements costs. BWS will enter into a development contract with a qualified developer to redevelop the site.

Because the project involves the use of City and County of Honolulu lands, an Environmental Impact Statement (EIS) is being prepared for the project in accordance with Hawai'i Revised Statutes (HRS) Chapter 343 and the EIS rules (Chapter 11-200 Hawai'i Administrative Rules). Notice of the DEIS will be published in the May 23, 2020 edition of the Office of Environmental Quality Control (OEQC)'s *The Environmental Notice.* A 45-day public review period will run until July 7, 2020.

The DEIS can be viewed or downloaded from the OEQC website by May 23, 2020. Enter the following URL into your web browser and it will take you directly to the DEIS.

http://oeqc2.doh.hawaii.gov/EA_EIS_Library/2020-05-23-OA-DEIS-BWS-Beretania-Complex-Redevelopment.pdf

Please send comments to the Proposing Agency, with copies to the Accepting Authority, and Consultant. Comments must be received or postmarked by **July 7, 2020**.

Proposing Agency: Board of Water Supply, City and County of Honolulu
Address: 630 South Beretania Street
Honolulu, Hawai'i 96843
Contact: Ernest Y.W. Lau, P.E., Manager and Chief Engineer
Email/Phone: bwsredevelopmenteis@hhf.com; (808) 748-5061

Accepting Authority:	Mayor, City and County of Honolulu
Address:	c/o Board of Water Supply 630 South Beretania Street Honolulu, Hawai'i 96843
Contact:	Mayor Kirk Caldwell
Email/Phone:	bwsredevelopmenteis@hhf.com; (808) 748-5061

Consultant:	HHF Planners
Address:	733 Bishop Street, Suite 2590 Honolulu, HI 96813
Contact:	Scott Ezer, Vice President
Email/Phone	bwsredevelopmenteis@hhf.com; (808) 457-3158

Note: If you wish to receive a CD copy, please submit a written request to HHF Planners at the address or e-mail shown above. In addition, please inform us if you do not wish to be included in the notification list for the Final EIS.

Please feel free to contact me at the phone number or e-mail address shown above or Leslie Kurisaki at lkurisaki@hhf.com, (808) 457-3182 if you would like additional information about the project. Thank you for participating in the environmental review process.

Very truly yours,

Scott Ezer
Vice President

DAVID Y. IGE
GOVERNOR OF HAWAII

SUZANNE D. CASE
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

June 25, 2020

LD 515e

MEMORANDUM

FROM:
~~TO:~~ **DLNR Agencies:**
___Div. of Aquatic Resources
___Div. of Boating & Ocean Recreation
_X_Engineering Division *(via email: DLNR.Engr@hawaii.gov)*
_X_Div. of Forestry & Wildlife *(via email: Rubyrosa.T.Terrago@hawaii.gov)*
___Div. of State Parks
_X_Commission on Water Resource Management *(via email: DLNR.CWRM@hawaii.gov)*
___Office of Conservation & Coastal Lands
_X_Land Division – Oahu District *(via email: DLNR.Land@hawaii.gov)*
_X_Historic Preservation *(via email: DLNR.Intake.SHPD@hawaii.gov)*

TO:
~~FROM:~~ Russell Y. Tsuji, Land Administrator KEM Russell Tsuji
SUBJECT: **Board of Water Supply Beretania Complex Redevelopment Project, Draft Environmental Impact Statement (EIS)**
LOCATION: Honolulu, Kona District, Island of Oahu; TMK: (1) 2-1-036:001 & 005(por.)
APPLICANT: **HHF PLANNERS, on behalf of the Board of Water Supply, City and County of Honolulu**

Transmitted for your review and comment is information on the above-referenced subject. The Draft EIS was published on May 23, 2020 in the Office of Environmental Quality Control's periodic bulletin, The Environmental Notice, which can be accessed at the following link:

http://oeqc2.doh.hawaii.gov/The_Environmental_Notice/2020-05-23-TEN.pdf

Please submit any comments by **July 06, 2020** via email to DLNR.Land@hawaii.gov, and copied to barbara.j.lee@hawaii.gov and darlene.k.nakamura@hawaii.gov. If no response is received by this date, we will assume your agency has no comments. Should you have any questions about this request, please contact Barbara Lee directly via email at barbara.j.lee@hawaii.gov. Thank you.

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

Signed: CSC
Print Name: Carty S. Chang, Chief Engineer
Division: Engineering Division
Date: Jul 6, 2020

Attachments
Cc: Central Files

DAVID Y. IGE
GOVERNOR OF HAWAII

SUZANNE D. CASE
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

June 25, 2020

LD 515e

MEMORANDUM

TO: **DLNR Agencies:**
___Div. of Aquatic Resources
___Div. of Boating & Ocean Recreation
_X_Engineering Division *(via email: DLNR.Engr@hawaii.gov)*
_X_Div. of Forestry & Wildlife *(via email: Rubyrosa.T.Terrago@hawaii.gov)*
___Div. of State Parks
_X_Commission on Water Resource Management *(via email: DLNR.CWRM@hawaii.gov)*
___Office of Conservation & Coastal Lands
_X_Land Division – Oahu District *(via email: DLNR.Land@hawaii.gov)*
_X_Historic Preservation *(via email: DLNR.Intake.SHPD@hawaii.gov)*

FROM: Russell Y. Tsuji, Land Administrator KEM Russell Tsuji

SUBJECT: **Board of Water Supply Beretania Complex Redevelopment Project, Draft Environmental Impact Statement (EIS)**

LOCATION: Honolulu, Kona District, Island of Oahu; TMK: (1) 2-1-036:001 & 005(por.)

APPLICANT: **HHF PLANNERS, on behalf of the Board of Water Supply, City and County of Honolulu**

Transmitted for your review and comment is information on the above-referenced subject. The Draft EIS was published on May 23, 2020 in the Office of Environmental Quality Control's periodic bulletin, The Environmental Notice, which can be accessed at the following link:

http://oeqc2.doh.hawaii.gov/The_Environmental_Notice/2020-05-23-TEN.pdf

Please submit any comments by **July 06, 2020** via email to DLNR.Land@hawaii.gov, and copied to barbara.j.lee@hawaii.gov and darlene.k.nakamura@hawaii.gov. If no response is received by this date, we will assume your agency has no comments. Should you have any questions about this request, please contact Barbara Lee directly via email at barbara.j.lee@hawaii.gov. Thank you.

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

Signed: Darlene Bryant-Takamatsu
Print Name: Darlene Bryant-Takamatsu
Division: Land Division
Date: 6/25/2020

Attachments
Cc: Central Files

HHF PLANNERS
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VIA EMAIL: DLNR.Land@hawaii.gov
Barbara.j.lee@hawaii.gov

August 4, 2020

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

Dear Mr. Tsuji:

Board of Water Supply Beretania Complex Redevelopment
Draft Environmental Impact Statement
Waikīkī Ahupua'a, Kona District, Island of O'ahu
TMK: (1) 2-1-036: 001 and 005 (portion)

Thank you for your letter dated July 7, 2020 in response to the Draft Environmental Impact Statement (DEIS) for the above referenced project. We note that both your Engineering Division and Land Division have no comments.

Thank you for your participation in this process. Your letter and this response will be reproduced in the Final EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

DAVID Y. IGE
GOVERNOR

JADE T. BUTAY
DIRECTOR

Deputy Directors
LYNN A.S. ARAKI-REGAN
DEREK J. CHOW
ROSS M. HIGASHI
EDWIN H. SNIFFEN

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

IN REPLY REFER TO:
STP 20-047
STP 8.2948

July 1, 2020

Mr. Ernest Y.W. Lau, P.E.
Manager and Chief Engineer
Board of Water Supply
City and County of Honolulu
630 South Beretania Street
Honolulu, Hawaii 96843

Dear Mr. Lau:

Subject: Board of Water Supply (BWS) Beretania Complex Redevelopment Project
Draft Environmental Impact Statement (DEIS)
Honolulu, Oahu, Hawaii
Tax Map Key: (1) 2-1-036:001, 005 (por)

The Hawaii Department of Transportation (HDOT) understands BWS is proposing three alternatives to redevelop the Beretania Complex with a project site of approximately 128,000 square feet. The alternatives include an assisted care living facility, affordable senior rental apartments, and a parking structure; each would also include an office building.

HDOT has the following comments:

Airports Division (HDOT-A)

The BWS has sufficiently addressed HDOT-A's comments previously provided in the Environmental Impact Statement Preparation Notice (EISPN) which was published in The Environmental Notice on November 23, 2018. HDOT-A has no further concerns with the subject project.

Highways Division (HDOT-HWY)

The project site is in close proximity to the Interstate H-1 Freeway, which is under State jurisdiction. The Traffic Impact Analysis Report should be revised to address whether the project will adversely impact the Interstate H-1 Freeway on- and off-ramps in the area.

If there are any questions, please contact Mr. Blayne Nikaido of the HDOT Statewide Transportation Planning Office at (808) 831-7979 or via email at blayne.h.nikaido@hawaii.gov.

Sincerely,

JADE T. BUTAY
Director of Transportation

c: Scott Ezer – Vice President, HHF Planners

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VIA EMAIL: natasha.p.torres@hawaii.gov
blayne.h.nikaido@hawaii.gov

August 5, 2020

Mr. Jade T. Butay, Director of Transportation
State of Hawaiʻi
Department of Transportation
869 Punchbowl Street
Honolulu, Hawaiʻi 96813-5097

Dear Mr. Butay:

Board of Water Supply Beretania Complex Redevelopment
Draft Environmental Impact Statement
Waikīkī Ahupuaʻa, Kona District, Island of Oʻahu
TMK: (1) 2-1-036: 001 and 005 (portion)

Thank you for your letter dated July 1, 2020 in response to the Draft Environmental Impact Statement (DEIS) for the above referenced project. The following is our response to your comments:

Airports Division (HDOT-A)
We note that the BWS has sufficiently addressed HDOT-A's previous comments and there are no further concerns with the subject project.

Highways Division (HDOT-HWY)
Your letter noted that the project site is in close proximity to the Interstate H-1 Freeway which is under State jurisdiction. HDOT-HWY requested that the Traffic Impact Analysis Report be revised to address whether the project will adversely impact the H-1 Freeway on- and off-ramps in the area.

The Traffic Impact Report shall be updated after a developer is selected and a development plan is finalized, to reflect any changes in the project density and to incorporate a more detailed assessment of the project's impact to the State facilities. This will be a requirement of the RFP.

Thank you for your participation in this process. Your letter and this response will be reproduced in the Final EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

200898 mng Dep Land

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

KIRK CALDWELL
MAYOR

MARK YONAMINE, P.E.
DIRECTOR

HAKU MILLES, P.E.
DEPUTY DIRECTOR

June 19, 2020

RECEIVED
BOARD OF WATER SUPPLY
2020 JUN 25 P 2: 15

Board of Water Supply
ATTN: Ernest Y.W. Lau, P.E.
Manager and Chief Engineer
630 South Beretania Street
Honolulu, HI 968l 3

Dear Mr. Lau,

Subject: Board of Water Supply Beretania Complex Redevelopment Project
Kona District, Island of Oahu TMK: [1] 2-1-036:001 & 2-1-036:005

Thank you for the opportunity to review and comment. The Department of Design and Construction does not have any comments at this time.

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

Sincerely,

For Mark Yonamine, P.E.
Director

cc: Scott Ezer, HHF Planners

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VIA EMAIL: pharah.sgan@honolulu.gov

August 4, 2020

Mr. Mark Yonamine, P.E., Director
Department of Design and Construction
City and County of Honolulu
650 South King Street, 11th Floor
Honolulu, Hawai'i 96813

Dear Mr. Yonamine:

Board of Water Supply Beretania Complex Redevelopment
Draft Environmental Impact Statement
Waikīkī Ahupua'a, Kona District, Island of O'ahu
TMK: (1) 2-1-036: 001 and 005 (portion)

Thank you for your letter dated December 5, 2018 in response to the Draft Environmental Impact Statement (DEIS) for the above referenced project. We note that the Department of Design and Construction does not have any comments at this time.

Thank you for your participation in this process. Your letter and this response will be reproduced in the Final EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

Pacific Guardian Center | 733 Bishop Street, Suite 2590 | Honolulu, Hawaii 96813
Telephone: 808.545.2055 | Facsimile: 808.545.2050 | www.hhf.com | email: info@hhf.com

From:	Liu, Rouen
To:	BWS Redevelopment EIS
Cc:	Kuwaye, Kristen
Subject:	BWS Beretania Complex Redevelopment Project
Date:	Tuesday, June 30, 2020 9:13:04 AM

[This message was sent from an outside source.]

Dear Scott Ezer,

Thank you for the opportunity to comment on the subject project. Hawaiian Electric Company has no objection to the project. Should Hawaiian Electric have existing easements and facilities on the subject properties, we will need continued access and proper clearances for maintenance of our facilities. We appreciate your efforts to keep us apprised of the subject project in the planning process. As the proposed BWS Beretania Complex Redevelopment project comes to fruition, please continue to keep us informed.

Should there be any questions, please contact me at 543-7245.

Thank you,

Rouen Liu
Permit Engineer
Hawaiian Electric Company, Inc.

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VIA EMAIL: Rouen.liu@hawaiianelectric.com
kristen.kuwaye@hawaiianelectric.com

August 4, 2020

Mr. Rouen Liu, Permit Engineer
Hawaiian Electric Company

Dear Mr. Liu:

Board of Water Supply Beretania Complex Redevelopment
Draft Environmental Impact Statement
Waikīkī Ahupuaʻa, Kona District, Island of Oʻahu
TMK: (1) 2-1-036: 001 and 005 (portion)

Thank you for your email dated June 30, 2020 in response to the Draft Environmental Impact Statement (DEIS) for the above referenced project. We note that Hawaiian Electric Company has no objection to the project.

We acknowledge your comments that should Hawaiian Electric have existing easements and facilities on the subject properties, you will need continued access and proper clearances for maintenance of your facilities. This will be included as a condition in the BWS Request for Proposals (RFP) and a condition for the future developer. We will continue to keep you informed about the project.

Thank you for your participation in this process. Your letter and this response will be reproduced in the Final EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

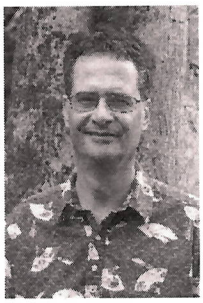
Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

Pacific Guardian Center | 733 Bishop Street, Suite 2590 | Honolulu, Hawaii 96813
Telephone: 808.545.2055 | Facsimile: 808.545.2050 | www.hhf.com | email: info@hhf.com



The Senate

STATE CAPITOL
HONOLULU, HAWAII 96813

July 20, 2020

The Honorable Kirk Caldwell
Mayor, City and County of Honolulu (Accepting Authority)
c/o Board of Water Supply
630 South Beretania Street
Honolulu, HI 96843
bwsredevelopmenteis@hhf.com

Dear Mayor Caldwell:

Please accept these comments on the Draft Environmental Impact Statement (DEIS) for the Board of Water Supply's (BWS') Beretania Complex Redevelopment. My understanding is that BWS is proposing three options for redevelopment of 2.94 acres, or 46.7% of the total 6.3-acre lot, that will involve BWS issuing a ground lease for the project area to the selected developer for a term of up to 65 years. The three options all include a new 10-story office building with several levels of parking for BWS purposes and a separate parking structure with stalls ranging from 605 to 1,155. Additionally, the redevelopment may include an assisted living facility or affordable senior rental apartments.

My primary two concerns are the undetermined scope and decision-making authority of the redevelopment and the impact of increased vehicle use of the lot. First, according to the DEIS, the developer, and not BWS, will decide on the final redevelopment plan and will not be limited by the three proposed options. Further, the DEIS states that the RFP "will not preclude" the option to re-zone from current A-2 Medium Density Apartment zoning to BMX-3, Community Business Mixed-Use

Karl Rhoads
Senate District 13
415 South Beretania Street, Room 204, Honolulu, Hawaii 96813
Phone: 586-6130
E-Mail: senrhoads@capitol.hawaii.gov

District zoning. This flexibility is considerable and does not provide any certainty as to the actual plans for redevelopment. Second, BWS is envisioning that several hundred additional parking spaces will be created and possibly new businesses, such as an assisted living facility, that will increase vehicular traffic to the lot. The impact of the additional vehicular traffic on the surrounding streets including South Beretania Street and the environmental impact to area residents and businesses does not seem to have been sufficiently evaluated in the DEIS. It is puzzling how the DEIS could conclude that "long-term air quality impacts are not expected to be significant" while acknowledging increased vehicle emissions due to more vehicular traffic in the area.

My other comments concern the proposal's lack of commitment to energy-efficiency building design and operation such as use of solar energy (green standards should be part of the RFP and lease), and lack of analysis on how to support and protect non-car modes of transportation to the site, especially for seniors.

Please do not hesitate to contact me concerning this letter. I appreciate your consideration of my comments.

With warmest aloha,

Karl Rhoads

KR: jaf

CC: Board of Water Supply, City and County of Honolulu (Proposing Agency)
Ernest Y. W. Lau, P.E., Manager and Chief Engineer
630 South Beretania Street
Honolulu, HI 96843
bwsredevelopmenteis@hhf.com

HHF Planners (Consultant)
Scott Ezer, Vice President
733 Bishop Street, Suite 2590, Honolulu, HI 96813
sezer@hhf.com

Karl Rhoads
Senate District 13
415 South Beretania Street, Room 204, Honolulu, Hawaii 96813
Phone: 586-6130
E-Mail: senrhoads@capitol.hawaii.gov

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VIA EMAIL:
senrhoads@capitol.hawaii.gov

August 31, 2020

Senator Karl Rhoads, Senate District 13
415 South Beretania Street, Room 204
Honolulu, Hawaiʻi 96813

Dear Senator Rhoads:

Board of Water Supply Beretania Complex Redevelopment
Draft Environmental Impact Statement
Waikīkī Ahupuaʻa, Kona District, Island of Oʻahu
TMK: (1) 2-1-036: 001 and 005 (portion)

Thank you for your letter dated July 20, 2020 in response to the Draft Environmental Impact Statement (DEIS) for the above referenced project. You have indicated your two primary concerns are the undetermined scope and decision-making authority of the redevelopment and the impact of increased vehicle use of the proposed parking structure. We offer the following responses to your comments, which are reproduced below.

Comment 1: *First, according to the DEIS, the developer, and not BWS, will decide on the final redevelopment plan and will not be limited by the three proposed options. Further, the DEIS states that the RFP "will not preclude" the options to re-zone from current A-2 Medium Density Apartment zoning to BMX-3, Community Business Mixed-Use District zoning. This flexibility is considerable and does not provide any certainty as to the actual plans for redevelopment*

> **Response:** It is correct that the developer, not BWS, will decide on the final redevelopment plan. That said, the three options evaluated in the DEIS (assisted care living facility, affordable senior rental apartments, and parking structure) were identified as the most likely under the A-2 zoning, based on a 2017 Market Assessment by Avalon Development (Appendix E of DEIS).
>
> As background, in 2013, BWS issued an RFP for redevelopment of a larger portion of the Beretania Complex. This previous RFP included some of the existing buildings, which are no longer part of the current redevelopment area. At that time, prospective developers indicated that they were hesitant to respond to the RFP, given the many "unknowns," such as existing archaeological conditions and historic preservation requirements. To minimize developer risk and provide more transparency to the public about potential redevelopment, BWS decided to prepare the EIS. The market study was completed to identify the most likely uses. At the same time, flexibility for the developer was

considered to be essential. In today's economy, flexibility has become even more critical to future development projects.

While we cannot provide 100% certainty about all possible futures, existing rules and regulations provide for additional evaluation and review if required. For example, should a developer pursue a zone change from A-2 to BMX-3, they will need to go through the City's zone change process. This extensive process will involve review by the Department of Planning and Permitting, a public hearing, and very likely a new or supplemental EIS for the proposed development. Even under current A-2 zoning, proposal of a use significantly different from the three scenarios may require a supplemental environmental document and/or further technical analysis.

Comment 2: *Second, BWS is envisioning that several hundred additional parking spaces will be created and possibly new businesses, such as an assisted living facility, that will increase vehicular traffic to the lot. The impact of the additional vehicular traffic on the surrounding streets including South Beretania Street and the environmental impact to area residents and businesses does not seem to have been sufficiently evaluated in the DEIS. It is puzzling how the DEIS could conclude that "long-term air quality impacts are not expected to be significant" while acknowledging increased vehicle emissions due to more vehicular traffic in the area.*

Response: Land uses such as assisted living (Scenario 1) and senior rental apartments (Scenario 2) typically do not require large numbers of parking spaces or generate high volumes of traffic. Instead, traffic impacts would be from the proposed parking structure that will be open to the public. At present, these future parking stalls cannot be tied to a specific land use. Therefore, trip generation was estimated for these parking stalls based on the methodology outlined below.

The traffic study utilized a trip generation methodology that incorporated the arrival and departure characteristics of vehicles accessing the proposed parking structure. These characteristics were based on anticipated parking occupancy over the course of a day, with peak occupancy (assumed 100% given the latent demand for parking) assumed to occur sometime during the middle of the day. The distribution of parking occupancy is based on empirical trends included in the industry-standard Parking Generation Manual published by the Institute of Transportation of Engineers for uses similar to those in the project vicinity. Based on the distribution of parking occupancy, only a portion of the parking garage is assumed to be occupied during the start and end of the day.

The vehicle trips generated by the three redevelopment scenarios were distributed based on the available routes and the existing distribution of vehicles at the study intersections. As a result, the majority of the site-generated trips were assumed to utilize South Beretania Street. The number of trips generated and their distribution are shown in Figures 8 to 10 of the traffic report in Appendix I of the DEIS. The analysis shows that while there will be an increase in the number of trips along the project roadways during the morning and afternoon peak periods, but the increases are not

high enough to decrease the level of service compared to traffic conditions without redevelopment.

Regarding long-term air quality impacts, you're correct in that there will be additional vehicles generated by the redevelopment and there will be associated vehicle emissions. The air quality analysis did account for the proposed parking structure, and it showed that neither short-term construction related impacts nor long-term impacts associated with increased vehicles are expected to be significant, i.e., none will cause air quality to exceed either Hawai'i or federal (primary or secondary) air quality standards for criteria pollutants. Air quality in the area is expected to continue to meet both federal and the more stringent State standards.

Other Comments: *My other comments concern the proposal's lack of commitment to energy-efficiency building design and operation such as use of solar energy (Green standards should be part of the RFP and lease), and lack of analysis on how to support and protect non-car modes of transportation to the site, especially for seniors.*

Response: BWS is committed to energy efficient design and operation and this will be included in the RFP and lease agreement. The RFP for the redevelopment that BWS released in 2013 included sustainability requirements for any development to be designed to achieve U.S. Green Building Council's LEED certification. This requirement will be carried over to the new RFP. In addition, the new RFP will require developers to comply with the Honolulu Complete Streets policies as consistent with the recommendation included in the traffic impact study and will require that the developer prepare a multi-modal assessment based on its final development plan

Thank you for your participation in this process. Your letter and this response will be reproduced in the Final EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL

HISTORIC HAWAI'I FOUNDATION

680 Iwilei Road Suite 690, Honolulu HI 96817 • (808) 523-2900 • preservation@historichawaii.org • www.historichawaii.org

July 7, 2020

Ernest Y. W. Lau, P.E.
Manager and Chief Engineer
Board of Water Supply
City and County of Honolulu
630 South Beretania Street
Honolulu, HI 96843

Via Email: bwsredevelopmenteis@hhf.com

RE: Draft Environmental Impact Statement (DEIS)
Board of Water Supply Beretania Complex Redevelopment
Waikīkī Ahupuaʻa, Kona District, Island of Oʻahu, Hawaiʻi
TMK : [1] 2-1-036: 001, 004, & 005

Dear Mr. Lau:

Historic Hawaiʻi Foundation received notice and request for comments from HHF Planners on behalf of the City and County of Honolulu Board of Water Supply (BWS) on the Draft Environmental Impact Statement (DEIS) for the proposed Redevelopment of a portion of the BWS Beretania Complex. Thank you for the opportunity to comment.

Interests of Historic Hawaiʻi Foundation

Historic Hawaiʻi Foundation is a statewide non-profit organization established in 1974 to encourage the preservation of sites, buildings, structures, objects and districts that are significant to the history of Hawaiʻi. As an organization that is concerned with the effect of the project on historic properties, Historic Hawaiʻi Foundation is providing these comments in accordance with Hawaiʻi Revised Statutes (HRS) Chapter 343. Previously, Historic Hawaiʻi Foundation provided comments in response to the Environmental Impact Assessment Preparation Notice (Letter dated December 13, 2018).

Project Scope

The DEIS states that, "BWS intends to issue a Request for Proposals [RFP] to redevelop approximately 128,100 square feet of its 6.3 acre Beretania Complex located at 630 South Beretania Street, Honolulu. The purpose of the proposed action is to provide a revenue stream to help offset a portion of BWS's operating expenses and capital improvements costs. BWS will enter into a development contract with a qualified developer and issue a ground lease for the use of a portion of the Beretania Complex. The lease term will not exceed 65 years and will provide for continued and uninterrupted use of existing BWS buildings and

operational facilities. Redevelopment will occur on areas currently being used as ground level parking for BWS employees, equipment and staff vehicles. All lost parking spaces will be replaced in the redevelopment." [DEIS Project Summary].

Historic Hawai'i Foundation is pleased to see that the Board of Water Supply restricted the project area to those portions of the property covered with surface parking, thus avoiding the historic buildings and structures on the makai portions of the property. Historic Hawai'i Foundation agrees with the project limits and the exclusion of the known historic buildings from the redevelopment site.

The specific redevelopment plan will be determined by the lessee. The DEIS evaluates three potential development scenarios, any of which could be implemented under existing zoning and appear to be supported by market conditions. The scenarios are:

- Scenario 1: Assisted Care Living Facility and Office Building
- Scenario 2: Affordable Senior Rental Apartments and Office Building
- Scenario 3: Parking Structure and Office Building

All three scenarios show a new BWS office building (10 stories), including several stories of parking, near the corner of Lusitana Street and Alapai Street. All scenarios also include a larger multi-level parking structure between Lisbon and Lauhala Streets. This structure will replace lost ground level parking and support the proposed uses. The number of parking stalls varies by scenario.

Identification of Historic and Cultural Resources

Any project with potential to affect historic properties must first include: 1) identification of the historic resource, 2) evaluation of its significance, 3) evaluation of the proposed project's potential effect on those resources, and 4) commitments to avoid, minimize and mitigate any potential adverse effect.

Historic Hawai'i Foundation is concerned that the DEIS only addresses the first two steps—identification and evaluation of significance—and does not include evaluation of potential effect and commitments to appropriate treatment measures for historic properties. Instead, BWS proposes to leave those critically important actions to the eventual developer.

The Draft EIS includes the following technical studies and reports that address historic properties:

- Archaeological Literature Review and Field Inspection [Appendices B & B-2]
- Cultural Impact Assessment [Appendix C]
- Historic Resources Evaluation [Appendix D]

The studies identify four buildings, one underground tunnel system, one bridge, and various landscape features in addition to archaeological sites and Native Hawaiian cultural resources and human remains. The Historic Resources evaluation identified the following historic buildings and structures:

- Pumping Station
- Pumping Station Annex
- Engineering Building

- World War II-era Underground Bomb Shelter
- Public Service Building/Administration Building
- Landscape elements (fountain, palms, grass, shade trees)
- Overhead footbridge over Lisbon Street connecting Engineering and Public Service Buildings

Historic Hawai'i Foundation appreciates the effort that has identified historic and cultural resources within and adjacent to the Project Area. We agree with the identification of these historic properties.

BWS's Proposed Actions Related to Historic and Cultural Resources

A. Archaeological Literature Review and Field Inspection - Recommendations[1]

The DEIS recommends the following actions related to identification and treatments for archaeological resources:

- a supplemental Archaeology Inventory Survey within the current project area;
- an archaeological monitoring program throughout ground disturbing activities during the proposed redevelopment project; and
- additional mitigation for effects to Site SIHP # 50-80-14-8040, possibly in the form of Historic American Building Survey (HABS) documentation.

The DEIS states that, "Any historic preservation requirements such as the supplemental AIS with subsurface excavation, monitoring program, architectural documentation, and any other historic preservation recommendations will be conducted by the developer, based on their development proposal and in consultation with SHPD [Hawai'i State Historic Preservation Division]" (emphasis added).

B. Historic Resources Evaluation – Potential effects and Unresolved Issues[2]

The DEIS states that the effect on historic architectural resources is to be determined by the actual development proposal, but that, "The construction of new buildings at the Beretania Complex has the potential to impose an adverse effect on existing historic structures, which include the pumping station, Engineering Building and Public Services Building. Although these historic buildings will not be moved or modified, the new buildings will affect the "setting, feeling, and association" as viewed from South Beretania Street.

"There could also be an adverse effect to the historic underground bomb shelter and tunnel system, depending on the final location and design of new BWS Office Building. From South Beretania Street, the view corridor between the Public Service Building and Engineering Buildings will be adversely affected by the presence of a 10-story parking garage. The adverse effect will be most pronounced under Scenario 3, which proposes a larger parking garage."

[1] LRFI for the Board of Water Supply Beretania Complex Project, Honolulu, O'ahu; p. 94
[2] DEIS Chapter 6 Other Impacts and Issues; p. 6-3

The DEIS states that, "Although three potential redevelopment scenarios were evaluated, the final use of the Project Area is unknown and unresolved and will be determined by the developer selected via the RFP process. As such, the exact nature and extent of environmental impacts, particularly on archaeological and historic resources and hazardous materials, is currently unknown. Resolution will occur once a specific development is proposed. At that time, further investigation into these issues will be conducted, with the evaluation based on the proposed improvements…. Further evaluation will be needed to assess impacts to historic architectural features and buildings, including the underground bomb shelter and tunnel system. These evaluations must be conducted in consultation with and approved by the State Historic Preservation Division" (emphasis added).

Historic Hawai'i Foundation Comments on Effect on Historic and Cultural Resources

Historic Hawai'i Foundation is extremely concerned that the assessment of effects and commitment to appropriate treatments and mitigation measures are not addressed in the DEIS. Instead, BWS has chosen to delay and delegate responsibility to an unknown future development partner. This lack of clarity and commitment fails to incorporate meaningful preservation measures into the project. Siting and design parameters should be outlined in the project requirements, carried into the RFP and made a requirement of the development. The selection of the development partner should include criteria that address how well the proposers understand the setting and require the proposers to describe how they would avoid, minimize and mitigate effects on historic and cultural resources. In prior comments, Historic Hawai'i Foundation recommended developing a Preservation Plan for all historic resources on the BWS campus as an appropriate mitigation measure.

Therefore, Historic Hawai'i Foundation strongly recommends that these measures be addressed in the Final EIS and implemented via the RFP process, selection of the developer and project design and execution. Furthermore, we strongly recommend that the project use, siting, design and preservation commitments include a consultation process that includes parties with an interest in the preservation of resources rather than relying solely and exclusively on consultation with SHPD.

Very truly yours,

Kiersten Faulkner
Executive Director

Copies via email:

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HHF PLANNERS
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VIA EMAIL: kiersten@historichawaii.org

September 9, 2020

Ms. Kiersten Faulkner
Executive Director
Historic Hawai'i Foundation
680 Iwilei Road, Suite 690
Honolulu, Hawai'i 96817

Dear Ms. Faulkner:

Board of Water Supply Beretania Complex Redevelopment
Draft Environmental Impact Statement
Waikīkī Ahupua'a, Kona District, Island of O'ahu
TMK: (1) 2-1-036: 001 and 005 (portion)

Thank you for your letter dated July 7, 2020 in response to the Draft Environmental Impact Statement (DEIS) for the above referenced project. We offer the following responses to your comments.

Project Scope

Comment 1: Historic Hawai'i Foundation is pleased to see that the Board of Water Supply restricted the project area to those portions of the property covered with surface parking, thus avoiding the historic buildings and structures on the makai portions of the property. Historic Hawai'i Foundation agrees with the project limits and the exclusion of the known historic buildings from the redevelopment site.

Response: Acknowledged

Identification of Historic and Cultural Resources

Comment 2: Historic Hawai'i Foundation is concerned that the DEIS only addresses the first two steps—identification and evaluation of significance—and does not include evaluation of potential effect and commitments to appropriate treatment measures for historic properties. Instead, BWS proposes to leave those critically important actions to the eventual developer.

Response: In their Historic Resources Evaluation for the BWS Beretania Complex Modernization (July 2019), MASON evaluated the potential effect of each of the three development scenarios. The evaluation of potential effect was presented in the MASON

report (Appendix D) in Tables 2 (Scenario 1), Table 3 (Scenario 2) and Table 4 (Scenario 3). These evaluations of potential effect were presented in Table 4-8 (p. 4-26) of the DEIS. The table has been modified to more accurately reflect MASON's evaluation of potential effect for each of the three scenarios.

Regarding commitments to appropriate treatment measures, see Response to Comment 5.

Comment 3: Historic Hawaiʻi Foundation appreciates the effort that has identified historic and cultural resources within and adjacent to the Project Area. We agree with the identification of these historic properties.

Response: Acknowledged

Comments on Effect on Historic and Cultural Resources

Comment 4: Historic Hawaiʻi Foundation is extremely concerned that the assessment of effects and commitment to appropriate treatments and mitigation measures are not addressed in the DEIS. Instead, BWS has chosen to delay and delegate responsibility to an unknown future development partner. This lack of clarity and commitment fails to incorporate meaningful preservation measures into the project. Siting and design parameters should be outlined in the project requirements, carried into the RFP and made a requirement of the development. The selection of the development partner should include criteria that address how well the proposers understand the setting and require the proposers to describe how they would avoid, minimize and mitigate effects on historic and cultural resources. In prior comments, Historic Hawaiʻi Foundation recommended developing a Preservation Plan for all historic resources on the BWS campus as an appropriate mitigation measure.

Response: As stated previously, assessment of effect is included in Table 4-8 of the DEIS. See response to Comment 5 for commitments to treatment and mitigation.

Comment 5: Therefore, Historic Hawaiʻi Foundation strongly recommends that these measures be addressed in the Final EIS and implemented via the RFP process, selection of the developer and project design and execution. Furthermore, we strongly recommend that the project use, siting, design and preservation commitments include a consultation process that includes parties with an interest in the preservation of resources rather than relying solely and exclusively on consultation with SHPD.

Response: Prior to issuance of the RFP, BWS will work with historic architect MASON to develop design guidelines that will help avoid, minimize, and mitigate the impacts on historic and cultural resources. The proposed guidelines may include, but shall not be limited to setbacks, open space requirements, landscape treatments, and exterior finishes and colors of new structures. These guidelines will be incorporated into the RFP and made a requirement of the redevelopment plan.

Thank you for your participation in this process. Your letter and this response will be reproduced in the Final EIS. If you have any questions, please contact me at sezer@hhf.com or by phone at 808-457-3158.

Sincerely,

HHF Planners

Scott Ezer, Principal

cc: Mike Matsuo, BWS
Keane Kakuda, AHL