

Environmental Impact Statement

Office of Environmental Quality Control
Office of the Governor
550 Halekuanaloa Street
Tahiti Office Building, Third Floor
Honolulu, Hawaii 96813

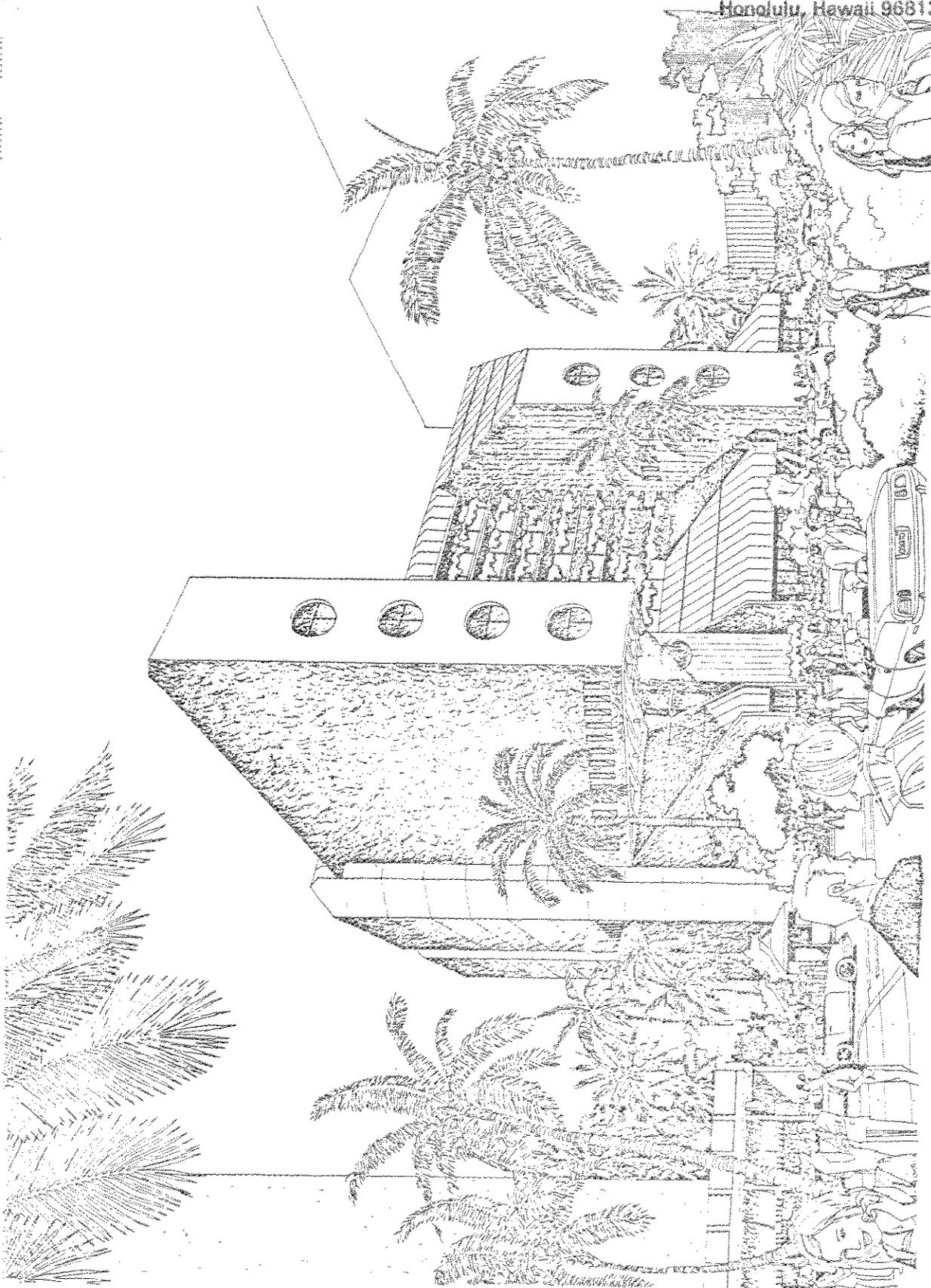


OA
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for the proposed
WAIKIKI TENNIS-COMMERCIAL BUILDING
WAIKIKI, CITY & COUNTY OF HONOLULU
S & M PARTNERS, Developer

July, 1977

Office of Environmental Quality Control
Office of the Governor
550 Halekauwila Street
Tani Office Building, Third Floor
Honolulu, Hawaii 96813



waikiki commercial bldg.

The Revised Environmental Impact Statement for the Proposed Tennis-Commercial Building, dated September, 1977, contains various changes to reflect the comments received during the environmental impact statement review period. In most cases, the revised pages (indicated by a large R in the upper right hand corner of the page) represents a clarification or elaboration of the original data provided. Section XIII has been added to the Revised EIS; this Section identifies and reproduces letters received during the EIS review period and immediately after the letter, the applicant's disposition is provided.

The following pages have been revised and incorporated into this Revised Environmental Impact Statement: i, viii, x, I-4, I-8, I-10, II-4, III-15A, II-15B, III-55, III-66, IV-1A, IV-1B, IV-3, Title page for Section VI, Title page for Section IX, X-3, the entire Section XIII.

SUMMARY

Project Description

The developer, S & M Partners, proposes to construct an 11-story (170.0' elevation at top of roof) tennis-commercial building on a 1.317 acre property situated on the makai-Diamond Head corner of Kuhio Avenue and Seaside Avenue in Waikiki.

Plans call for the development of an 11-story (170.0') tennis complex and commercial building containing the following facilities:

1. Approximately 58,000 square feet of commercial space on the first and second floors.
2. Supporting parking facilities for approximately 300 automobiles on floors 3, 4 and 5.
3. 34,620 square feet of office space will be provided on the 6th floor.
4. Twelve (12) championship tennis courts meeting United States Lawn Tennis Association specifications. There will be four (4) courts on the roof and eight (8) indoor courts (4 courts each on levels 7 and 8). The two indoor four-court clusters will require 6 vertical floors of building (one indoor court floor will be equivalent to 3 floors or 35' in height).

The property is designated as a "Resort Commercial Precinct" under the Waikiki Special Design District (Ordinance No. 4573). No change in land use designation is required for the development.

Probable Impacts of the Proposed Project

1. Impact on the Site's Physical Geography. The proposed action is not anticipated to affect the existing topography and soils of the

existing site. Because the original topography has been modified by man's previous action and development, it is not anticipated that this development would further create negative impacts on the project site.

2. Impact on the Site's Flora and Fauna. The flora and fauna of the project site will be altered. There will be the loss of several trees within the project site; however, this will be unavoidable. Project plans call for the retention of approximately 35 coconut trees around the perimeter of the project site. Furthermore, in the long-term future, planned landscaping will mature and will complement the building's design.

The avifauna will be temporarily displaced (during construction); however, in time it is expected that the avifauna will return as in the case of other project sites.

3. Impact on Air Quality. The air quality analysis was based on diffusion calculations using worst case meteorological conditions. Based on this analysis, it was determined that the project will have a small impact on the air quality within the immediate area. Calculations for the peak hour carbon monoxide concentrations under worst case conditions indicate that in 1995 there will be approximately 6-7.5% increase in the carbon monoxide concentrations with the project at four receptor locations. However, it should be acknowledged that these predicted carbon monoxide concentrations under normal trade wind conditions, would be approximately 1/4 of the values identified on Table 1, page III-8.

Fugitive dust and debris will be created during construction.

However, standard control measures will include frequent wetting of loose soil areas with water or oil as necessary. Once construction is completed, however, the building itself will emit pollutants (directly) only in form of small air conditioner losses which should have no significant impact on the air quality of the area.

4. Impact on Noise. It was concluded from the noise impact study that the proposed Waikiki Tennis-Commercial Building will not be detrimental or excessive and will generally be masked or blend in with the background noise in the neighborhood. Additionally, under normal use, the noise from the parking operations and the tennis activities will not violate Department of Health's noise standards.
5. Impact on Socioeconomic. The proposed project will eliminate two businesses within the project site. Presently there are a total of six commercial establishments within the project site. These include a car rental firm, hair-styling salon, beauty shop, storage lot for a car rental firm, lunchwagon (transient), and a sidewalk jewelry vendor (transient). It is anticipated that the hair-styling salon and the beauty shop will be dislocated and will not be re-established. This would result in the loss of approximately ten jobs.

The remaining businesses are expected to relocate and find suitable properties elsewhere.

Residential Impact. Presently there is an apartment operation (Seaside Surf Hotel) located in a 2- and 5-story building on the project site. At the time of the on-site investigation or survey, 25 of the 39 units were rented. The proposed project will displace approximately 38 residents residing in these apartments. The

resulting impact would be clearly to negate the present functions of the apartment complex which have been: (a) to provide a place to live for new residents of Hawaii recently arriving from the Mainland during the interim period of the arrival and the subsequent consolidation of employment and social contacts that enable them to move to a more permanent location; and (b) to provide the few long-term residents with what they consider desirable places to live at a price lower than would be charged at similar locations. Also, the approximate full-time-equivalent job presently associated with the rentals would be lost.

Tennis Impact. Specific economic impacts on commercial tennis facilities could not be determined. Basically, it is anticipated that impact on commercial tennis court facilities serving the visitor market would be affected. However, that effect must also be viewed in terms of court fees, the present solidarity and business at the existing facilities and the marketability of these other commercial tennis courts.

The public tennis courts are not anticipated to be affected.

Impact on Commercial Competition. It is anticipated that the proposed project will be viable and not create an over-supply of commercial space in Waikiki. This evaluation was based on the assumption that in 1974 the retail commercial space in Waikiki was at an equilibrium. Additionally, this evaluation included the effects of existing as well as proposed commercial projects in Waikiki.

Employment Impact. Drawing from experiences elsewhere in Waikiki,

operation of facilities within the proposed project (excluding office space) is conservatively estimated to involve 300 full-time and 60 part-time jobs.

6. Impact on Transportation. It was concluded that the existing highway system and the future highway system will be able to accommodate the future traffic volumes anticipated for the proposed project. The approximately 300 parking stalls will generate approximately 1,500 trips per day for the 12-hour period from 9:00 a.m. to 9:00 p.m., assuming parking turnover to average approximately 5. If the peak hour is 10 per cent of the daily volume of 1,500 trips, the number of trips generated would total only 150. The one combination exit and entrance along Seaside Avenue will be adequate to accommodate the approximately 300 parking stalls for the proposed building.
7. Impact on Services and Facilities. The proposed project would generally increase the private demand for public services and facilities. Because the demand for gas and electricity will vary according to the tenants in the commercial and office area, the analysis did not include specific quantities. The following utilities were determined to be adequate: gas, telephone, electricity, water, and sewer. Drainage is adequate for the area as identified by the Department of Public Works. Solid waste collection and disposal will be provided by a private firm. Fire and police facilities will be adequate to accommodate the project needs.
8. Impact on Scenic Views and View Planes. It is not anticipated that the proposed building will adversely affect the present views from other buildings adjacent to the project site. The site is

presently obscured by adjacent high-rise hotels and buildings which will still remain higher than the proposed building height (170'). The present roadway, pedestrian and hotel lanai views consist of high-rise structures in Waikiki and thus, this project would do little but to add to the high-rise view. There will be a loss of the low profile configuration of the existing site; however, landscaping and building design are expected to create a visual atmosphere which would enhance the sides of the building and the perimeter of the property.

9. Historical and Archaeological Considerations. There are no known historical or archaeological interest within the project property.
10. Natural Hazards. The project property is not located in any zone of natural hazards. It is located within the 100-year flooding area of the Ala Wai Canal. However, its distance from the Ala Wai Canal will likely reduce any adverse impact of damage to the building.
11. The Relationship of the Proposed Action to Land Use Plans, Policies and Controls for the Affected Area. The proposed project is generally consistent with the applicable and established goals and policies of the State and County. A review of the State land use designation, City and County General Plan designation and zoning and the Waikiki Special Design District ordinance indicated that the proposed project is consistent with these established policies.

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I. PROJECT DESCRIPTION

"Project description which shall include the following information, but need not supply extensive detail beyond that needed for evaluation and review of the environmental impact:

1. a detailed map (preferably U.S.G.S. topographic map) and related regional map;
2. statement of objectives;
3. general description of the action's technical, economic, social, and environmental characteristics;
4. use of public funds or lands for the action;
5. phasing and timing of action;
6. summary technical data; diagrams; and other information necessary to permit an evaluation of potential environmental impact by commenting agencies and the public;
7. historic perspective."

Environmental Impact Statement Regulations, Environmental Quality Commission, State of Hawaii. Sub-Part E., 1:42 Content Requirements, b.

The developer, S & M Partners, proposes to construct an 11-story (170.0' elevation at top of roof) tennis-commercial building on a 1.317 acre property situated on the makai-Diamond Head corner of Kuhio Avenue and Seaside Avenue in Waikiki.

A. Project Location

The site for the proposed Waikiki Tennis-Commercial Building is located in Waikiki, Honolulu District, Island of Oahu (see Figure 1). The site lies in the approximate center of the Waikiki area (see Figure 2) which is located 2.8 miles southeast of downtown Honolulu. Figure 3 locates the site in relationship to the streets in the Waikiki area.

The project property is identified by Tax Map Key 2-6-22: 04, 05, 19, 21, 22, 25, 28, 31, 32, 33 and a portion of 24, totaling 57,359.2 square feet or 1.317 acres.

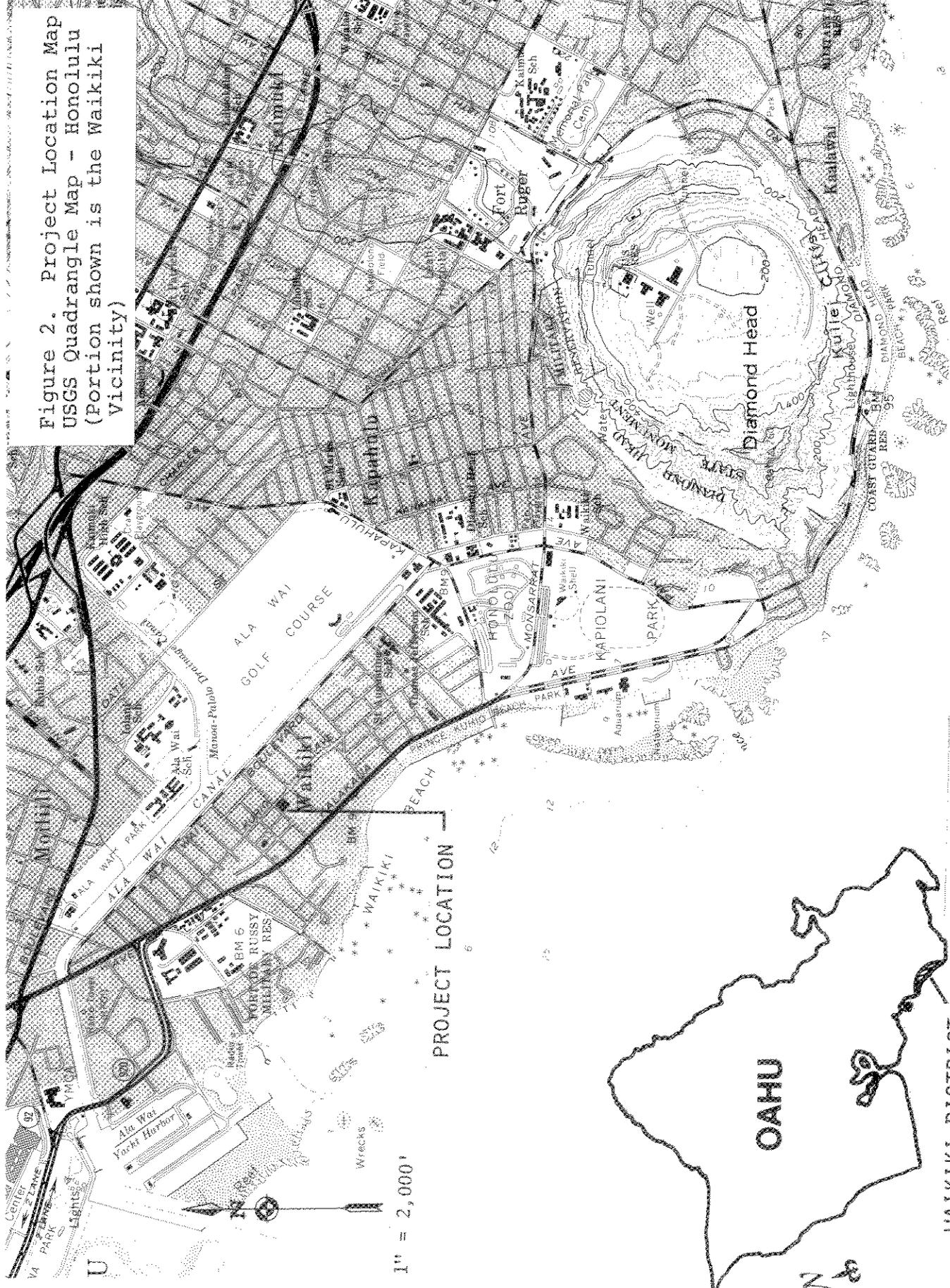
B. Statement of Objectives

The proposed Waikiki Tennis-Commercial Building is expected to provide additional business, office, and commercial accommodations in the Waikiki area. Plans for the building also include the development of championship tennis facilities which would primarily accommodate the needs of the Waikiki visitors who are tennis enthusiasts.

The site for the project is well located in the approximate center of Waikiki. It is within easy access (walking distance) of most Waikiki hotels and presently there is a continuous flow of pedestrian traffic in the area. The developer found that this was amongst the most available and desirable sites in Waikiki for commercial development.

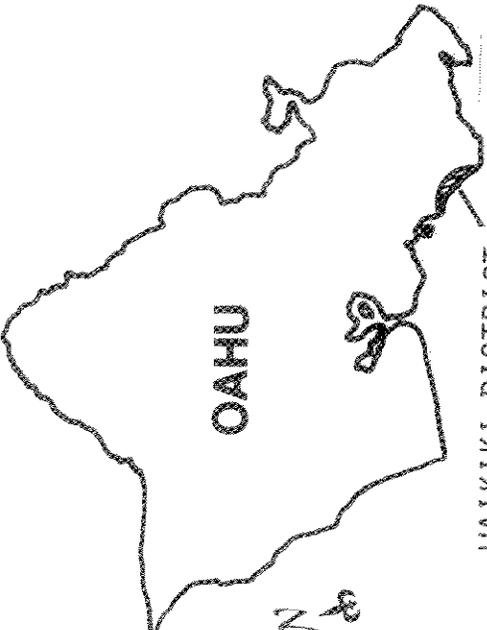
The market demand for the proposed tennis facilities was evaluated by Harris, Kerr, Forster & Company, Certified Public Accountants (April, 1977). Briefly, the report concluded that: (1) there is a large number of visitors

Figure 2. Project Location Map
 USCS Quadrangle Map - Honolulu
 (Portion shown is the Waikiki
 Vicinity)



1" = 2,000'

PROJECT LOCATION



WAIKIKI DISTRICT

Scale 1" = 3.0 miles

who are tennis-playing enthusiasts who would play tennis if there was the opportunity and availability of "good" tennis facilities in Waikiki, (2) an evaluation of existing public and private tennis courts and facilities indicate that their accessibility is poor, court availability is not acceptable, and the physical facilities are inferior to those proposed by the project; and (3) the management of such a tennis complex by a large hotel chain in Waikiki would likely enhance the appeal and increase revenue to the overall hotel chain.

C. General Description of the Action's Technical, Economic, Social, and Environmental Characteristics

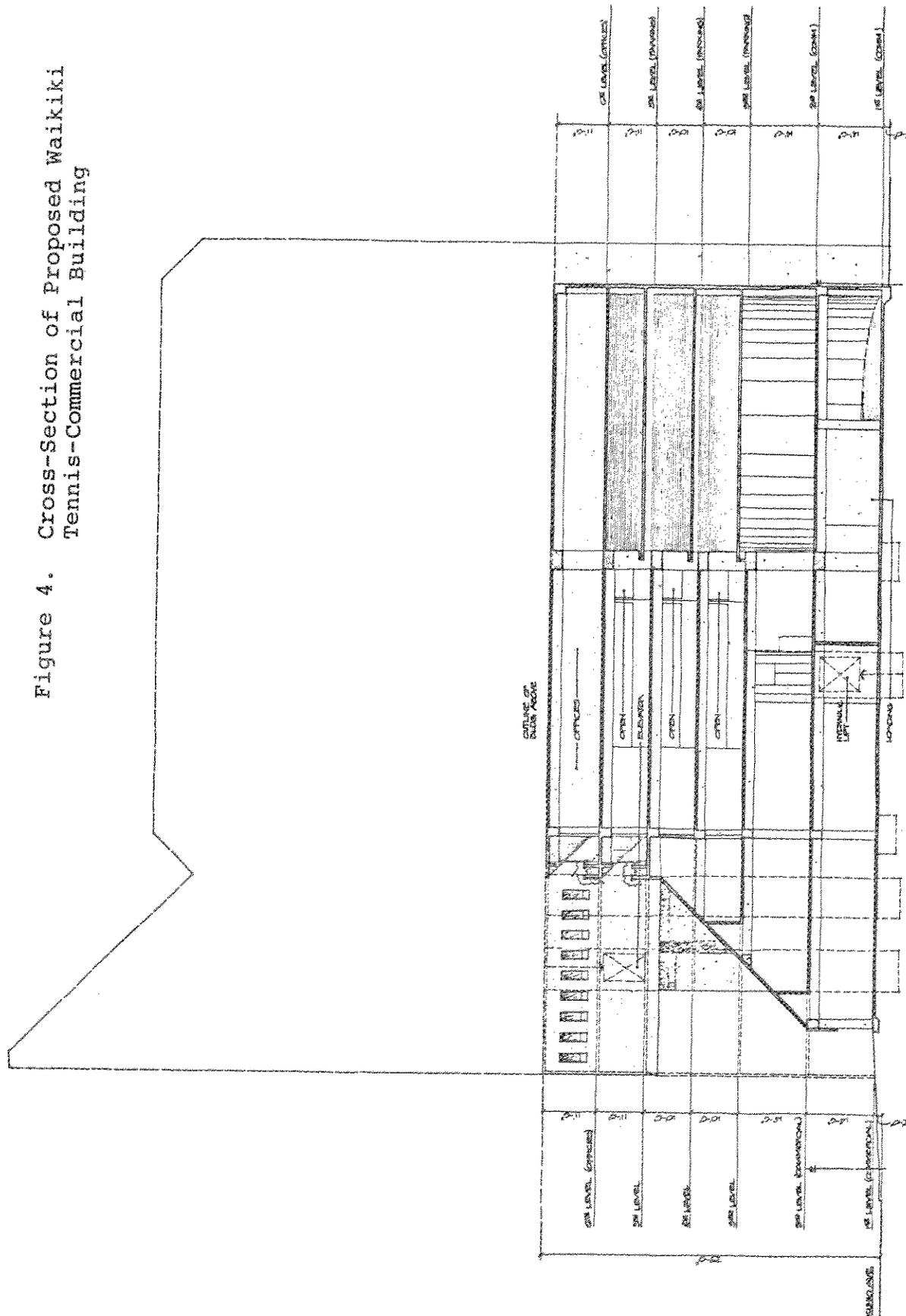
As mentioned above, the plans call for the development of an 11-story (170.0') tennis complex and commercial building containing the following facilities:

1. Approximately 58,000 square feet of commercial space on the first and second floors.
2. Supporting parking facilities for approximately 300 automobiles on floors 3, 4 and 5.
3. 34,620 square feet of office space will be provided on the 6th floor.
4. Twelve (12) championship tennis courts meeting United States Lawn Tennis Association specifications. There will be four (4) courts on the roof and eight (8) indoor courts (4 courts each on levels 7 and 8). The two indoor four-court clusters will require 6 vertical floors of building (one indoor court floor will be equivalent to 3 floors or 35' in height).

The property is designated as a "Resort Commercial Precinct" under the Waikiki Special Design District (Ordinance No. 4573).¹ No change in land use designation is required for the development.

¹ See Appendix A, Waikiki Special Design District, Ordinance No. 4573, (maps).

Figure 4. Cross-Section of Proposed Waikiki Tennis-Commercial Building



waikiki commercial bldg.
 CROSS-SECTION
 1/32" = 1.0'

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Department of Public Works, City and County of Honolulu, provided the following response as it related to drainage (see page X-6):

"Drainage facility in the area is adequate; however, Seaside Avenue has many "holidays" where storm runoff collects and ponds. Interior drains from the development may connect to the existing drain manhole on the intersection of Seaside and Kuhio (same corner)."

The water line connections will be to either a 12" existing line along Seaside or to a 16" existing line along Kuhio, wherever it is more appropriate.

The gas line connection will be similar; the hook-up will be at Seaside to a 4" line or at Kuhio to a 4" line.

The telephone hook-up will be to a 4" line at the Ewa-Makai end of the building.

Electricity will be tapped from an existing HH-13A, which is located between the Waikiki twin theatre complex (Waikiki 1 and 2) and the project property. (HH-13A comes from HH-13 at the Ewa-Makai corner of the property.) From HH-13A, lines enter the building to an electrical room, controlled by Hawaiian Electric Co. The building's power is then tapped from this room. An existing HECO transformer located in the middle of this property will be moved in a direct line to a 10' x 12' easement created just off the sidewalk at Kuhio Avenue.

The plans for improving the sewer system to accommodate this project have been approved (see Appendix B). The hook-up is to an existing 8" lateral and then to an existing 12" sewer line on Seaside Avenue running towards Kuhio Avenue. At Kuhio Avenue, this line is connected (existing) to a 16" line running in a Diamond Head to Ewa direction on the property. About 200' from the Ewa end of the property, a new by-pass has been installed connecting the 16" line to a 20" line running parallel. Relating to the adequacy of the sewer facility,

the Department of Public Works, City and County of Honolulu (response dated June 6, 1977, on page X-6) commented: "Sewer facility is adequate to serve the proposed development."

The Landscaping Concept.¹ The Landscaping Plan is laid out to invite the pedestrian into and around the building. The pedestrian meanders through the clusters of coconut and other trees, which grow out of warm-toned, brick-paved malls. Almost every one of the nearly 3 dozen coconut trees growing along the perimeter of the property will be retained. The few trees standing in the middle of the property have been removed. Large trees will be planted along the entire walkway to provide an almost continuous canopy along Seaside Avenue, Kuhio Avenue and Duke's Lane. For interest, movement, and the cooling effect, water, in the form of shallow ponds, has been introduced at two locations. (See Exhibit C, Preliminary Landscape Plan on page XIII-18.)

Ventilation of Parking Floors and Tennis Courts. All parking floors and indoor tennis courts will be naturally ventilated. Trade winds enter the building from Duke's Lane-Kuhio end and vent out through the Seaside end. Mechanical ventilation for the parking floors will be used as needed by Code Requirements.

Solid Waste. Solid waste will be collected and disposed by a privately retained refuse company.

Vehicular Access. To achieve the highest level of safety and to prevent any significant congestion on the main arterial (Kuhio Avenue), a combination exit and entrance will be located on Seaside Avenue approximately 170 feet from the Kuhio Avenue intersection. This location is more suitable than one on Kuhio Avenue, since access to a parking lot from a major highway always contributes to

¹ Description of Landscaping Concept by Boone & Associates, Inc.

congestion as well as traffic accidents. This is because motorists entering the lot must slow down, causing traffic on the major highway to also slow down. If the parking spaces are all occupied, other motorists waiting to enter the parking garage will use one lane of the major highway as a storage lane, thus eliminating or curtailing one lane of the major highway for the movement of traffic.

Land Clearing and Construction Activities will include:

1. Demolition and removal of existing buildings and vegetation (save the coconut palm trees).
2. Minor grading will be undertaken. (Land clearing will be done in two increments).
3. Pile driving during the foundation stage.
4. Construction of the building.

D. Use of Public Lands and Funds

No public lands and/or monies will be utilized for the proposed Waikiki Tennis-Commercial Building. The role of government will be limited to the review of applications for various approvals, permits and certifications of plans prior to the implementation of the project. These approvals and permits necessary are identified in Section XII of this EIS.

E. Phasing and Timing

The developer has established the following phasing for the design, engineering, and construction work.

Final Working Drawings	September-November, 1977
Building Department Submission	December, 1977 - February, 1978
Start of Construction	February, 1978
End of Construction	February, 1979

F. Project Background

The chronology of the Environmental Impact Statement and supportive studies are as follows:

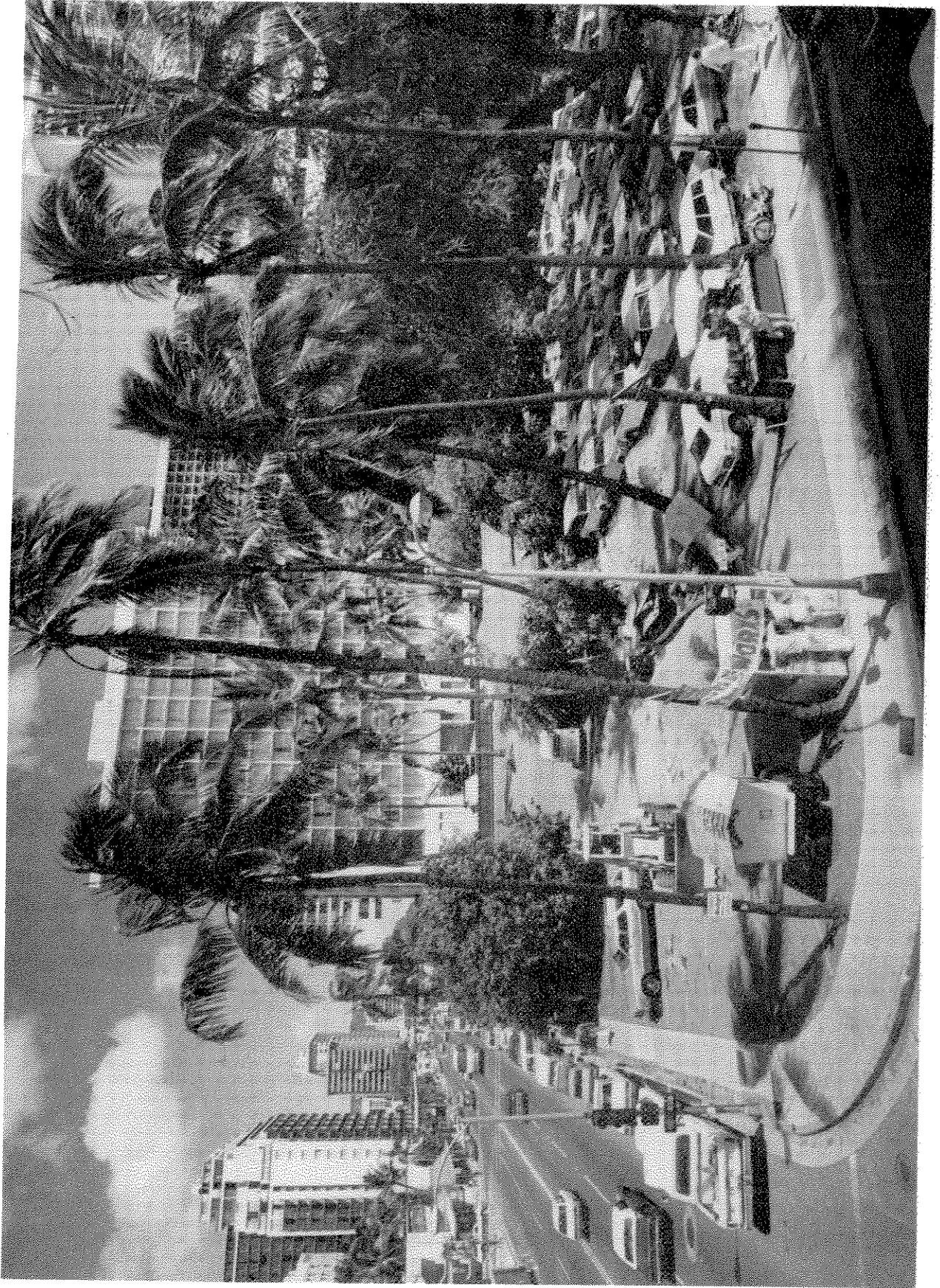
1. Department of Land Utilization prepared the Environmental Impact Statement Assessment/Determination Notice. The Notice is dated April 22, 1977.
2. EIS Determination Notice appears in the EQC Bulletin of May 8, 1977.
3. Boone & Associates, Inc. requested from various governmental and private agencies comments on the Environmental Impact Statement Assessment/Determination Notice. The request is dated May 24, 1977.
4. Deadline date for comments on the EIS Assessment/Determination Notice is set for June 27, 1977.
5. Response from Boone & Associates, Inc. to the agencies commenting on the EIS Determination Notice, July 5, 1977.
6. Support studies for the Environmental Impact Statement were prepared May, June, 1977.
7. Submittal of the Environmental Impact Statement, July 20, 1977.
8. Deadline for comments on the Environmental Impact Statement, August 22, 1977.
9. Submittal of the Revised Environmental Impact Statement to Environmental Quality Commission (20 copies) and the Department of Land Utilization (5 copies), September 6, 1977.

II. DESCRIPTION OF THE EXISTING SITE CONDITIONS

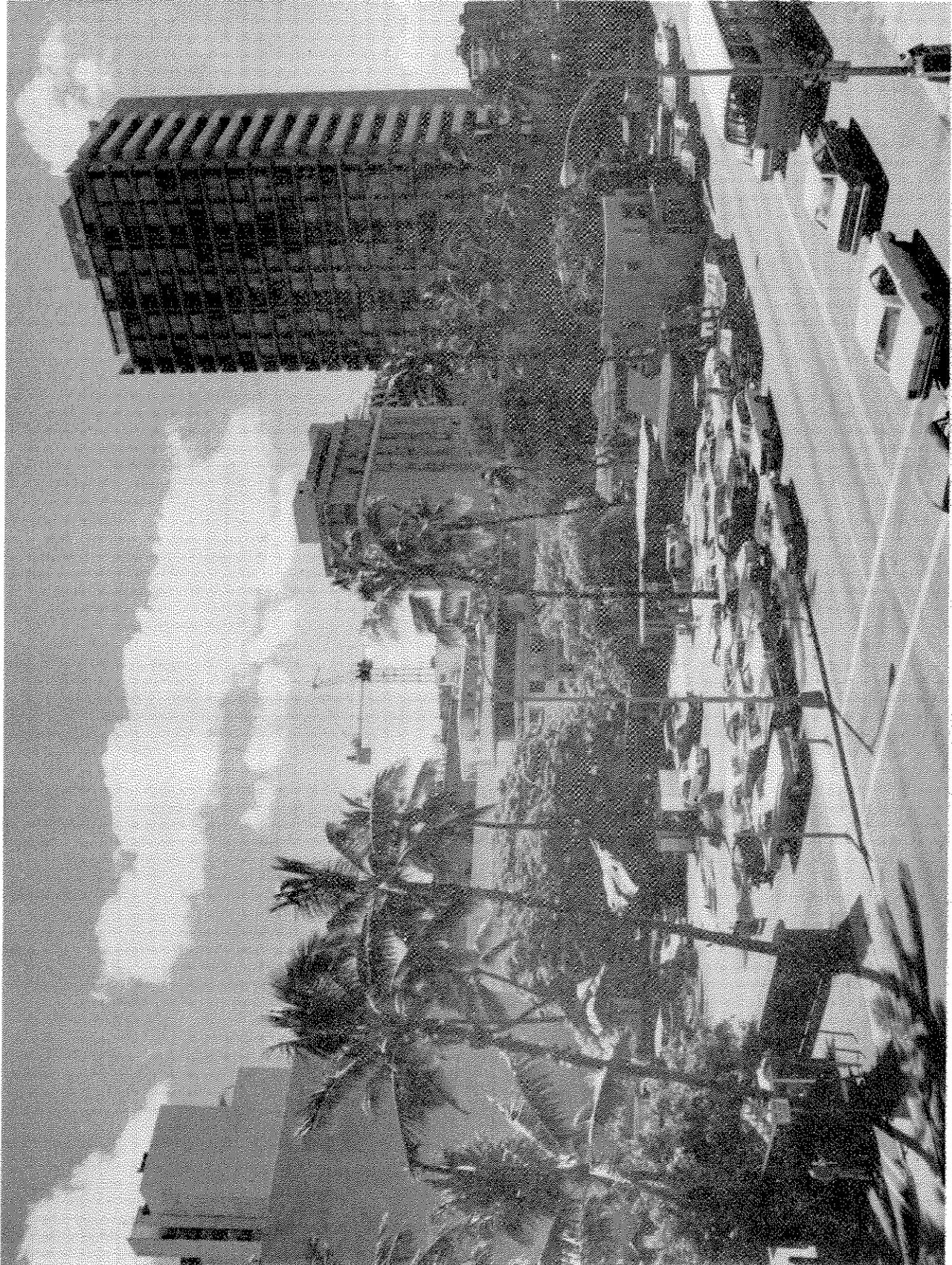
The proposed project site is level and lies approximately 5 feet above sea level. It does not have any unique or unusual topographic or natural features. Photographs 1 and 2 show the project site (taken June 30, 1977); (1) looking from the Kuhio Avenue and Seaside Avenue intersection towards Diamond Head, and (2) showing the portion of the property which fronts Kuhio Avenue in an Ewa direction, respectively. As can be seen by these photographs, approximately 35 coconut palm trees are located along the project property's perimeter. Some cultivated shrubs and a few hao trees are found in the approximate center of the project site, along the sides of the various structures on the property. Various other trees (smaller banyan trees and a shower tree) are found along the property's boundary, adjacent to Duke's Lane.

Presently the existing uses on the project site fall into two categories-- residential and commercial. The Seaside Surf Hotel is the sole "residential" establishment on the property. The Hotel is located in the makai-Ewa corner of the subject property. It is an older five-story apartment-type establishment which essentially is rented on a monthly basis. At the Diamond Head end of the 5-story structure (perpendicular to that structure) is a 2-story walk-up apartment building. This building is part of the Seaside Surf Hotel and contains several apartment units and laundry facilities. A total of 34 units are located in these two buildings. The apartment manager's office and a beauty salon are located on the ground floor of the five-story building, and fronts Seaside Avenue. In addition to these residences, there is a vacant two-bedroom wooden house (partially collapsed) on the project property (see Figure 5).

The remaining portions of the property are used by five commercial enterprises. The commercial uses include a hair-styling center, a small storage lot

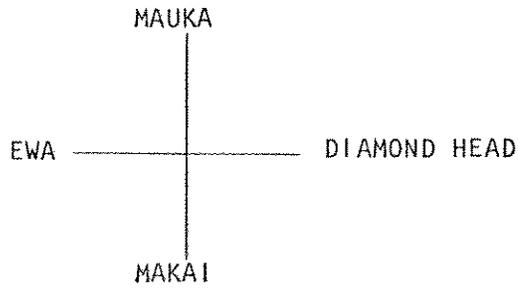


Photograph 1. (Taken June 30, 1977). View of the project site from the Kuhio Avenue and Seaside Avenue intersection, towards a Diamond Head direction.

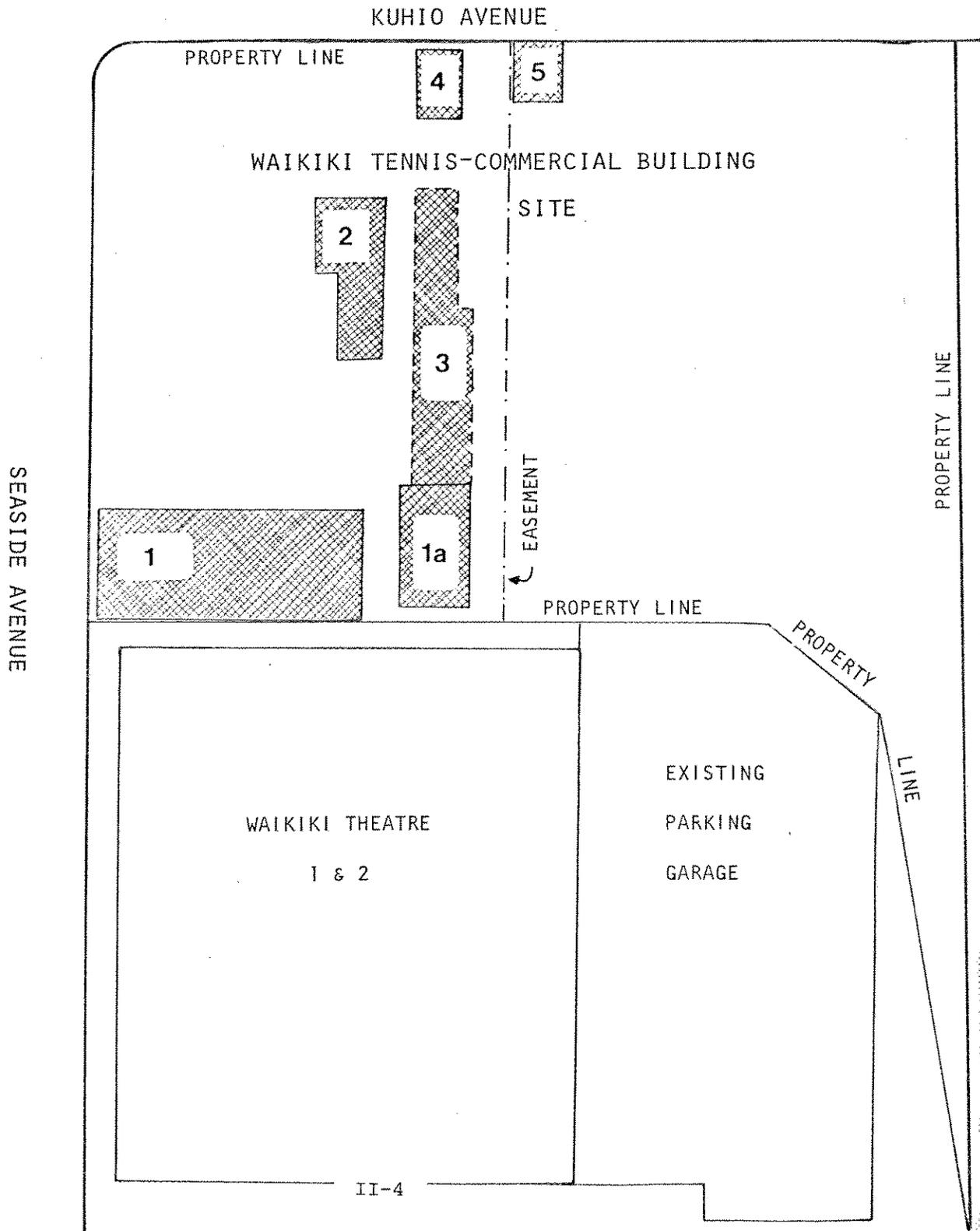


Photograph 2. (Taken June 30, 1977). Portion of the project site which fronts Kuhio Avenue. Taken in an Ewa-makai direction from Kuhio Avenue.

Figure 5. Location of Structures on the Waikiki Tennis-Commercial Building Site



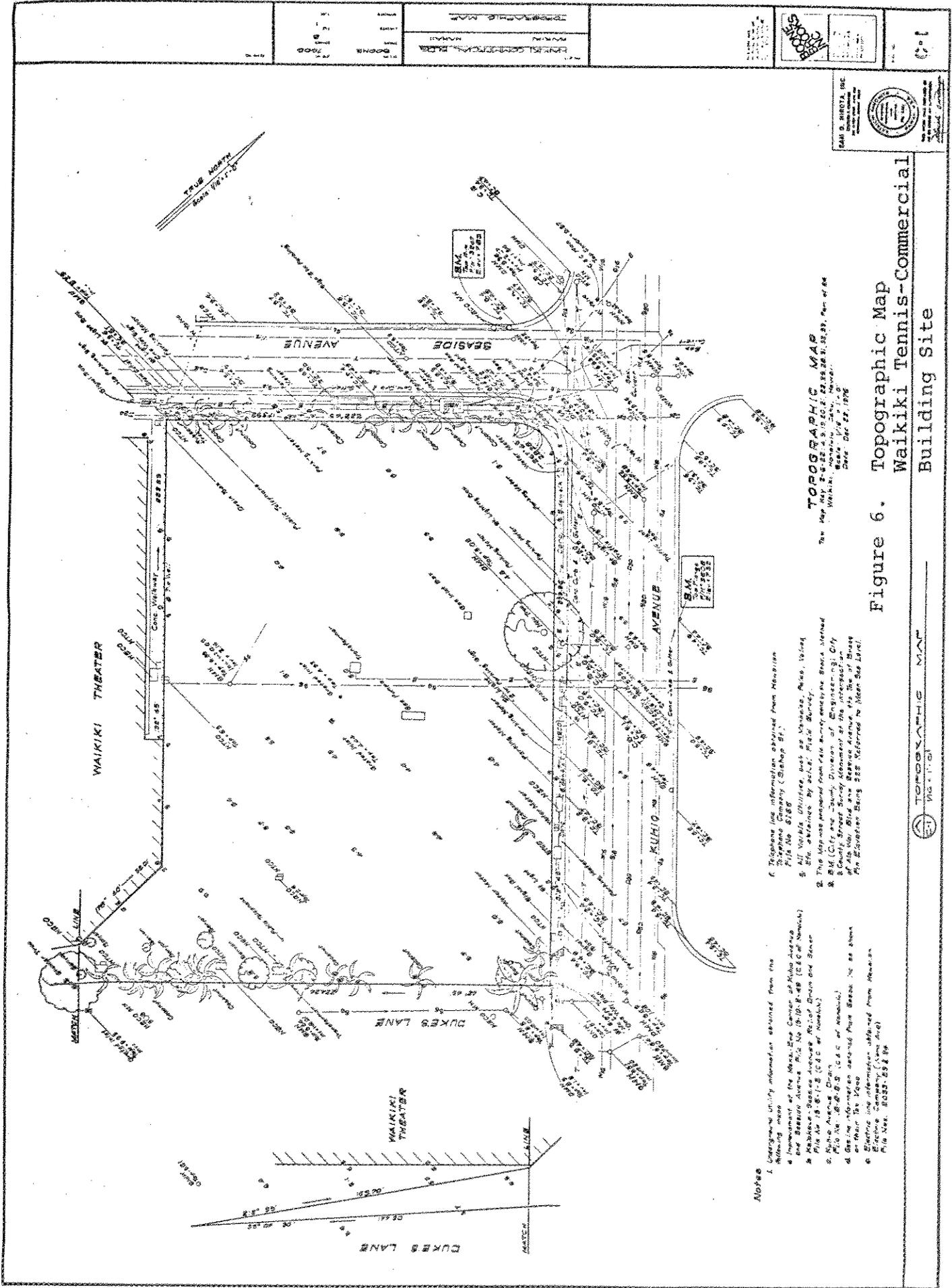
- 1 & 1a = Seaside Surf Hotel
- 2 = Vacant two bedroom house (partially collapsed)
- 3 = Workshed enclosed with fence and tin roof
- 4 = Two story hair salon
- 5 = Budget Rent-A-Car Sales Office



for a car rental firm, a lunchwagon (transient), a jewelry vendor (transient), and a car rental operation which includes sales, carwashing and gasoline servicing facilities, and a sizeable storage lot. The hair-styling center is housed in an older 2-story concrete building which fronts Kuhio Avenue (see Figure 5). This is a small building of approximately 1,000 square feet, and appears to be 40+ years old. A small storage lot for a car rental firm is located mauka of the Seaside Surf Hotel, see Figure 5 , and stores approximately 50 cars. Both the lunchwagon and jewelry vendor are transient-type businesses which normally set up their operations (along Seaside Avenue) in the morning, and remove their operations from the property at the end of the day. The car rental firm takes up the Diamond Head half of the property. Their operations include a small wooden structure (where rental of the cars and the office is housed), gasoline pumps, a portable type car wash, and a wooden workshed with corrugated tin roof.

Adjacent Uses. The subject property is in the heart of the Waikiki District. It abuts (on the makai side) a twin theatre complex (Waikiki 1 & 2) and the theatres' parking structure. Directly across Seaside Avenue from the site is a high-rise hotel, Marine Surf Waikiki and a first-class restaurant (Matteo's). Directly across Kuhio Avenue is a group of small business establishments (housed in two- and three-story buildings). Diagonally across the intersection of Kuhio and Seaside is a recently constructed high-rise condominium building (Royal Kuhio). In the Diamond Head direction, the property is separated from Coral Reef Hotel (another high-rise building) by Duke's Lane.

Figures 3 and 6 show the existing site topography and the site's relationship to the major hotels in Waikiki, respectively.



TOPOGRAPHIC MAP
 Waikiki, Honolulu, T.H., Hawaii.
 Scale 1/4" = 1'-0"
 Date Dec 27, 1976

**Figure 6. Topographic Map
 Waikiki Tennis-Commercial
 Building Site**

- Notes**
1. Underground utility information obtained from the following map:
 - a. Improvement of the Maunaloa Center at Kaha Avenue and Seaside Avenue, File No. 19-10-1-88 (C.C.C. of Honolulu)
 - b. Kaha-Avenue, Seaside Avenue, Kaha Drive and Seaside, File No. 19-10-1-8 (C.C.C. of Honolulu)
 - c. Kaha Avenue Drive, File No. 18-10-1-85 (C.C.C. of Honolulu)
 - d. Seaside Information obtained from Seaside, File No. 19-10-1-88 (C.C.C. of Honolulu)
 - e. Seaside Information obtained from Honolulu Electric Company, File No. 2027-55 & 56
 2. Topographic information obtained from Honolulu Electric Company (Sheet No. 57), File No. 2188
 3. All Waikiki Utilities, just as Waikiki, Aka, Waikiki, etc. obtained by actual field survey.
 4. The Map was prepared from data furnished by the Honolulu City and County, Division of Engineering, City and County Street Survey Department at the intersection of Kaha Avenue, Seaside Avenue, Kaha Avenue, and Seaside Avenue, File No. 2188 (C.C.C. of Honolulu)
 5. Information being 258 referred to Sheet No. 57.

TOPOGRAPHIC MAP
 No. 10



III. PROBABLE ENVIRONMENTAL IMPACTS OF THE PROPOSED PROJECT

Note: This Section has been prepared to combine three sections which are normally separate categories:

Description of Environmental Setting; the Probable Impact of the Proposed Action on the Environment; and Any Probable Adverse Effects Which Cannot be Avoided. Rather than treating a subject (e.g. air quality, noise) in three sections, it was felt that the text would be simplified and more orderly to permit the reviewer to continuously read under one subject heading the existing environmental conditions, probable impacts, and probable adverse effects.

"Description of environmental setting, including a description of the environment in the vicinity of the action, as it exists before commencement of the action, from both a local and regional perspective. Special emphasis shall be placed on environmental resources that are rare or unique to the region and the project site (including natural or man-made resources of historic, archaeological, or aesthetic significance); specific reference to related projects, public and private, existent or planned in the region shall be included for purposes of examining the possible overall cumulative impact of such actions. Proposing agencies and applicants shall also identify, where appropriate, population and growth characteristics of the affected area and any population and growth assumptions used to justify the action and determine secondary

population ~~and~~ growth impacts resulting from the proposed action and its alternatives. In any event, it is essential that the sources of data used to identify, qualify or evaluate ~~any~~ and all environmental consequences be expressly noted."

"The probable impact of the proposed action on the environment. Consideration of all phases of the action and consideration of all consequences on the environment; secondary ~~or~~ indirect, as well as primary or direct shall be included. The interrelationships and cumulative environmental impacts of the proposed action and other related projects shall be discussed in the EIS. It should be realized that several actions, in particular those that involve the construction of public facilities or structures (e.g., highways, airports, sewer systems, water resource projects, etc.) may well stimulate or induce secondary effects. Such secondary effects may be equally important as, or more important than, primary effects, and shall be thoroughly discussed to fully describe the probable impact of the proposed action on the environment. The population and growth impacts of an action shall be estimated if expected to be significant, and an evaluation made of the effects of any possible change in population patterns or growth upon the resource base, including land use, water, and public services, of the area in question. Also, if the proposed action constitutes a direct or indirect source of pollution as prescribed by any governmental

agency, necessary data shall be incorporated in the EIS.

"Any probable adverse environmental effects which cannot be avoided. Any adverse effects such as water or air pollution, urban congestion, threats to public health or other consequences adverse to environmental goals and guidelines established by Chapters 342 and 344, Hawaii Revised Statutes or any revision thereof and amendments thereto shall be included. This should be a brief summary of any adverse impacts including those effects discussed in paragraph (e) which are adverse and unavoidable under the proposed action. Also, rationale for proceeding with a proposed action, notwithstanding unavoidable effects, must be clearly set forth in this section."

Environmental Impact Statement Regulations, Environmental Quality Commission, State of Hawaii. Sub-Part E., 1:42 Content Requirements, c., e., and f.

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A. Impact on the Site's Physical Geography

Topography. The project property is level and lies 5.5 feet above sea level. Having been developed previously, it is assumed that the original topography has been modified by man's action. No prominent natural topographic features are found on the project site.

The proposed action is not expected to affect the existing topography of the site. The site will remain level with landscaping along the sides of the building and Kuhio and Seaside Avenues.

Soils. The Soil Conservation Service (SCS) has generally determined the series for lands on Oahu. The SCS publication, Soil Survey Interpretation - Islands of Kauai, Oahu, Maui, Molokai, and Lanai, State of Hawaii, shows that the soils of the project property consist of soils in the Jaucas series (specifically, Jaucas sand, 0 to 15 percent slopes, JaC). A brief description of the Jaucas soil series is provided below:

"This series consists of excessively drained, calcareous soils that occur as narrow strips on coastal plains, adjacent to the ocean. These soils occur on all the islands of this survey area. They developed in wind- and water-deposited sand from coral and seashells. They are nearly level to strongly sloping."

The plans call for a pile-driven foundation to support the proposed building. This is necessary due to the high water table and the load bearing caused by the size of the building.¹

Prior to construction, a soil study for the site will be prepared. This study will include results of soil borings so that the site's specific soil

¹ Traditional building practices in Waikiki makes it necessary for this method to be used.

conditions can be reviewed and appropriate engineering measures (to achieve stability) can be taken.

Climate. The climate in the Waikiki area is considered to be dry, mild and uniform. The annual average rainfall for Waikiki is approximately 20 inches. The temperature, much like the rest of the island, is mild and uniform, ranging from 60°F (January - mean low temperature) to 85°F (mean high temperature) in the summer months.

The observed surface winds¹ show that the predominant wind direction and higher wind speeds are from a north, north-east, and east direction (66.7% of the time), and averages 11.2 knots per hour. Although 13% of the time winds blow from the north to west quadrant, these winds have lower wind speeds, 5.75 knots. The yearly mean wind speed is 9.7 miles per hour.

B. Impact on the Site's Flora and Fauna²

The flora presently existing on the project property can be placed in three categories: (1) coconut palm trees (approximately 35), small banayan trees, and other trees which are located along the perimeter of the property; (2) cultivated plants (mock orange, plumeria, octopus plant) and shrubs found around the Seaside Surf Hotel; and (3) some coconut trees, shrubs, and hao trees located within the center of the property. The trees found along the perimeter of the project site (see Figure 6) will be retained.

¹ It should be noted that surface wind data is recorded at a limited number of stations on Oahu. In relation to other stations, the Honolulu International Airport is the nearest to the site. It was determined that wind conditions at the project site would most likely be represented by the data recorded at the Honolulu International Airport due to the similarly observed wind directions in Waikiki.

² No detailed field surveys on the flora and fauna were conducted. The findings and conclusions in this section was based on the landscape architect findings, general site observations, and literature research.

The remaining trees and plants found on the site are not considered rare or endangered and are found in various locations throughout Oahu. Their removal is not expected to be significant or adverse.

The fauna on the site is limited to a few species of rodents and various birds which migrate and possibly nest in the area. Rodents include the House mouse (Mus musculus), Roof rat (Rattus rattus), and Norway rat (Rattus norvegicus). On various site visits, the more commonly observed avifauna included the Common Mynah, Pigeons, Doves (both Barred and Spotted), House Sparrow, and Cardinals. Other birds which may nest or visit the project site (but were not observed) include the House Finch, Mockingbird, Golden Plover, Ricebird and White-eye.¹

None of these birds are endemic and/or endangered species.

The avifauna is not expected to be significantly or adversely affected. Construction, site work, and the removal of trees (used for nesting) will cause the birdlife to relocate. Upon completion of the project and the appearance of trees (as provided for by the landscape plan), the avifauna should return, generally in proportion to the amount of trees and nesting/feeding areas found within the project site.

Conclusion. The flora and fauna will be altered. There will be a loss of various trees within the project site, however, this will be unavoidable. In the long-term future, the landscaping will mature and will likely beautify and complement the building. The avifauna will be temporarily displaced, but again, in time should return to the project site.

¹ Based on the Atlas of Hawaii, Department of Geography, University of Hawaii, 1973.

C. Impact on Air Quality

An "Air Quality Study for the Proposed Waikiki Tennis-Commercial Building at Waikiki, Oahu", was prepared by Barry Root, Air Pollution Consultant, in June, 1977. The purpose of the air analysis was to assess the short and long-term air quality impacts of this proposed project by treating it as both a direct and indirect source of air pollutants. Only the area in the immediate vicinity of the project was considered in evaluating these impacts. Provided below, are portions of Root's study, as well as the overall conclusions. This study, as well as other supportive studies prepared for this project are available for public review, at the Environmental Quality Commission's office, and the Main Branch of the State Library. The study has also been provided to those reviewers, State Department of Health, Environmental Center (University of Hawaii), and American Lung Association of Hawaii, whose expertise and/or principal interests are in this area.

Direct Emissions. Given the nature of this proposed building, it is not, in itself, likely to be a major direct source of air pollutants. It is true that the construction of any new building will produce a certain amount of wind-blown dust and debris, but this adverse effect on air quality is very local and short term. In air pollution terms, emissions of this nature are termed "fugitive dust" and Chapter 43 of the State of Hawaii Department of Health Rules and Regulations stipulates the kinds of control measures that are to be employed to reduce these emissions. Primary control measures include frequent wetting of loose soil areas with water or oil as necessary, good housekeeping on the jobsite, and the possible erection of dust catching barriers if nearby local

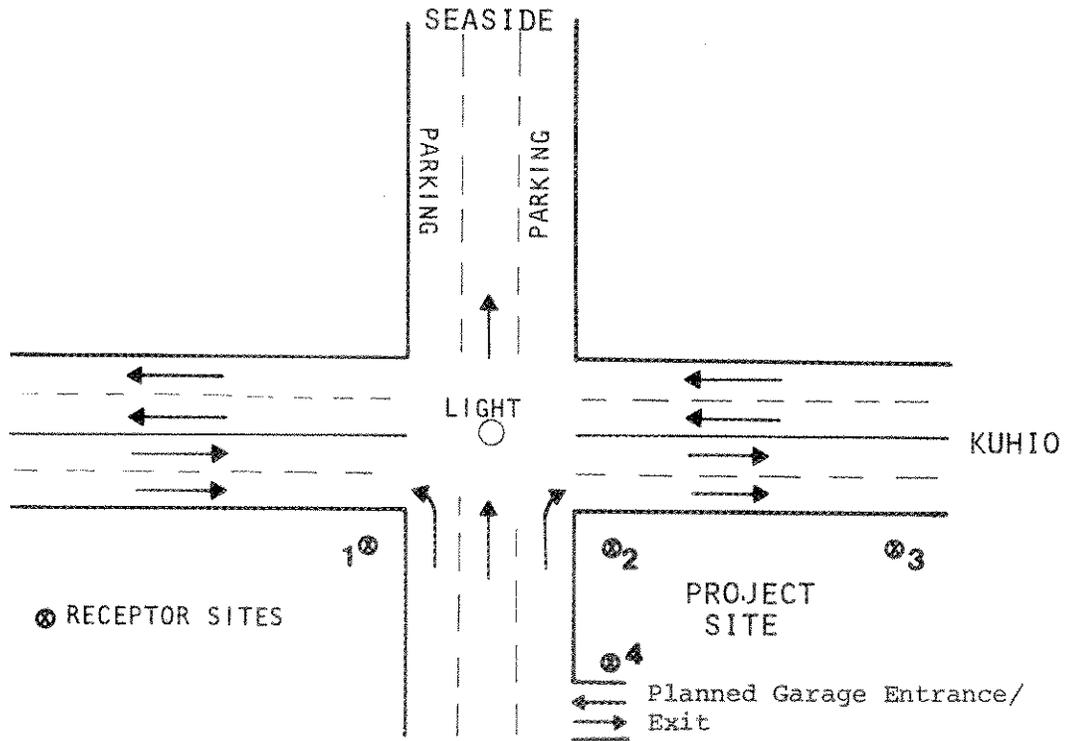
residents are being subjected to airborne particulate levels above the State of Hawaii limit of $100 \mu\text{g}/\text{m}^3$ for any 24-hour period.

Once construction is completed, however, the building itself will emit pollutants only in the form of small air conditioner losses which should have no significant impact on the air quality of the area.

Indirect Emissions. The main air quality consideration in evaluating the impact of this project is not construction, but utilization. With three floors of parking, this building will constitute a major indirect source of air pollutant emissions in that it will attract hundreds of automobiles on a daily basis. Utilization of the proposed building will result in additional automobile traffic in the streets which will in turn produce slightly increased emissions of carbon monoxide, hydrocarbons, and nitrogen oxides into the atmosphere in the vicinity of the project site.

Carbon Monoxide Impact Analysis. Utilizing the EPA-developed method (Guidelines for Air Quality Maintenance Planning and Analysis, Volume 9: Evaluating Indirect Sources) for predicting peak hour ambient levels of carbon monoxide from street traffic, a detailed carbon monoxide concentration was carried out for four potentially significant receptor sites near the project site. Sites 1 and 2, (see Figure 7) on the makai side of the Kuhio/Seaside intersection, were selected because they would be expected to have the highest peak hour CO concentrations under worst case conditions with or without the project throughout the time period (1978 and 1995) considered. Site 3, on the makai side of Kuhio Avenue, was selected to show peak hour CO concentrations along the sidewalk in front of the proposed project. Site 4 on the Diamond Head side of Seaside Avenue near the entrance and exit gates of the proposed parking garage was selected to give an indication of expected CO values on that side of the building. Each site is on the sidewalk about 3 meters from the nearest traffic lane.

Figure 7. Air Quality Study Receptor Sites



(Not to Scale)

Calculations for sites 1 and 2 assumed a green to cycle ratio of 0.6 in the Kuhio Avenue direction for the traffic signal at the Kuhio/Seaside intersection. This signal now appears to be operating on demand during peak hour which allows traffic to flow more freely than would be the case for any fixed cycle. The G/cy ratio of 0.6 was one of several ratios observed but it results in the most conservative CO forecasts. Traffic downstream was assumed to move at 15 mph although speeds faster than this are possible even during peak hour. Again this assumption tends to produce more conservative CO estimates. For Sites 3 and 4 street traffic capacities for both Kuhio and Seaside Avenues were assumed to be 800 vehicles per lane per hour under free flow or stop and go conditions (Level of Service E).

A background CO value of 4 mg/m³ was assumed for 1978, but by 1995 this value is expected to be reduced by the same proportion as auto emissions, i.e. to about 0.7 mg/m³.

Results of the analysis of carbon monoxide generated by street traffic are shown in Tables 1 and 2. Table 1 shows the worst case peak hour situation at the receptor sites selected. As can be seen from the table there will be only a small difference between expected CO concentrations with or without the project. In 1978 carbon monoxide concentrations at each of the sites can be expected to exceed the State of Hawaii one-hour standard of 10 mg/m³ under worst case conditions. At sites 1 and 2 near the intersection CO values more than three times the allowable State standard could occur. No values as high as the Federal limits are expected, however, and by 1995 CO emission controls on automobiles are expected to lower emissions from traffic at that time to values at or below allowable State limits.

Carbon monoxide levels for the eight-hour time average are more difficult to predict using simple models because both traffic and meteorological conditions

TABLE 1

PEAK HOUR CARBON MONOXIDE CONCENTRATIONS (mg/m³)
 UNDER WORST CASE CONDITIONS AT SELECTED
 RECEPTOR SITES^a

<u>Site</u>	<u>1978</u>		<u>1995</u>		<u>State of Hawaii Standard</u>	<u>Federal Standard</u>
	<u>Without Project</u>	<u>With Project</u>	<u>Without Project</u>	<u>With Project</u>		
1	30.8	33.0	9.1	9.8	10	40
2	31.7	34.3	9.3	10.0	10	40
3	11.0	11.2	3.2	3.4	10	40
4	12.1	13.5	3.4	3.7	10	40

TABLE 2

PREDICTED EIGHT HOUR MAXIMUM CARBON MONOXIDE
 CONCENTRATIONS (mg/m³) AT SELECTED RECEPTOR SITES^a

<u>Site</u>	<u>1978</u>		<u>1995</u>		<u>State of Hawaii Standard</u>	<u>Federal Standard</u>
	<u>Without Project</u>	<u>With Project</u>	<u>Without Project</u>	<u>With Project</u>		
1	18.5	19.8	5.5	5.9	5	10
2	19.0	20.6	5.6	6.0	5	10
3	6.6	6.7	1.9	2.0	5	10
4	7.3	8.1	2.0	2.2	5	10

^aSee Figure 7 for location of receptor sites.

can fluctuate greatly in that time period. The EPA guidelines suggest that a "meteorological persistence factor" of 0.6 be used to convert peak hour concentrations into expected eight-hour averages. Results of the use of this factor are shown in Table 2. On an eight-hour basis, 1978 predicted CO values for all sites are well above State of Hawaii limits and for sites 1 and 2 predicted values are higher than the less stringent Federal standard. Even by 1995 eight-hour CO levels in excess of permissible State levels are expected at the sites near the intersection. While this is a significant problem, it is very important to note that this situation is expected to occur with or without the proposed project.

Garage Traffic. Carbon monoxide emissions from the parking garage during peak hour will contribute only 0.4 mg/m³ to ground level CO concentrations directly downwind from the building and this peak value will occur about 190 meters downwind from the site. (See Table 3). By 1995 this value is expected to be insignificant. No air pollution problems are expected at elevated receptors directly downwind from the parking garage.

Conclusion. All of the foregoing statements concerning carbon monoxide concentrations are based on conservative diffusion calculations using worst case meteorological conditions. Predicted CO concentrations under normal trade wind conditions would be about one fourth of the values shown in this report.

Given that Waikiki Special Design District Plans already provide for a development of this nature and given that the worst case carbon monoxide concentrations produced by the additional traffic generated by the project are not likely to cause substantial changes in the expected air quality of the area, it seems reasonable to conclude that from an air pollution standpoint this building represents an environmentally-responsible addition to Waikiki's commercial area.

TABLE 3

PEAK HOUR CARBON MONOXIDE CONCENTRATIONS (mg/m³)
 AT ELEVATED LOCATIONS DIRECTLY DOWNWIND FROM
 THE PROPOSED PARKING GARAGE

Parking Level	Elevation Above Ground (m)	1978				1995				State of Hawaii Standard	Federal Standard
		Downwind Distance (m)				Downwind Distance (m)					
		15	25	40	100	15	25	40	100		
5	15	6.0	4.5	3.0	1.5	1.8	1.4	.9	.5	10	40
4	12	8.4	6.3	4.2	2.1	2.5	1.9	1.3	.6	10	40
3	9	8.0	6.0	4.0	2.0	2.4	1.8	1.2	.6	10	40

D. Impact on Noise

Ronald A. Darby and Associates prepared a noise impact report, dated June 18, 1977, for the proposed Waikiki Tennis-Commercial Building. Many sections of this noise impact study have been incorporated below. This study, as well as other supportive studies prepared for this project is on file for public review at the Environmental Quality Commission's office, and the Main Branch of the State Library.

The Existing Noise Environment. In the environs of the proposed project, the exterior ambient noise levels are dominated primarily by the street noises mentioned above. The dominate noise experienced by pedestrians and occupants of naturally ventilated low rises facing the roads are from the direct sound transmission path of passing vehicles, typically 70 dBA to 90 dBA maximum levels from accelerating automobiles and buses respectively when less than 50 feet away. Between vehicle passes in the early morning, these listeners may typically experience a quiet time with minimum noise levels of 50 dBA to 55 dBA. Of particular concern is the background noise existing in high-rises which are adjacent to the proposed project and potentially will experience greater impact than the nearby low rises.

(Figure 8 orients the reviewer to the level of dBA as it relates to familiar sound.)

Noise measurements were therefore made in Hotel #1 (see Figures 9 and 10) on a 12th floor lanai during the most potentially sensitive times - the evening, night, and early morning hours. It was observed that occupants in this hotel and all nearby high rise hotels had lanai doors closed apparently to mitigate the noise and for security purposes. The closing of the door in the test room (Hotel #1), reduced the interior noise level by about 15 dBA - for example from 55 dBA to 40 dBA during relatively quiet periods. EPA

FIGURE 8

Sound Levels and Human Response

Common Sounds	Noise Level (dB)	Response
	150	
Carrier deck jet operation Air raid siren	140	
	130	
— Jet takeoff (200 feet) Thunderclap Discotheque	120	
— Auto horn (3 feet)	110	
Garbage truck	100	
Heavy truck (50 feet) City traffic	90	
Alarm clock (2 feet) Hair dryer	80	
Noisy restaurant Freeway traffic Man's voice (3 feet)	70	
Air conditioning unit (20 feet)	60	
Light auto traffic (100 feet)	50	
Living room Bedroom Quiet office	40	
Library Soft whisper (15 feet)	30	
Broadcasting studio	20	
	10	
	0	

This decibel (dB) table compares some common sounds and shows how they rank in potential harm to hearing. Note that 70 dB is the point at which noise begins to harm hearing. To the ear, each 10 dB increase seems twice as loud.

Source: Environmental Protection Agency, "Facts About Noise "

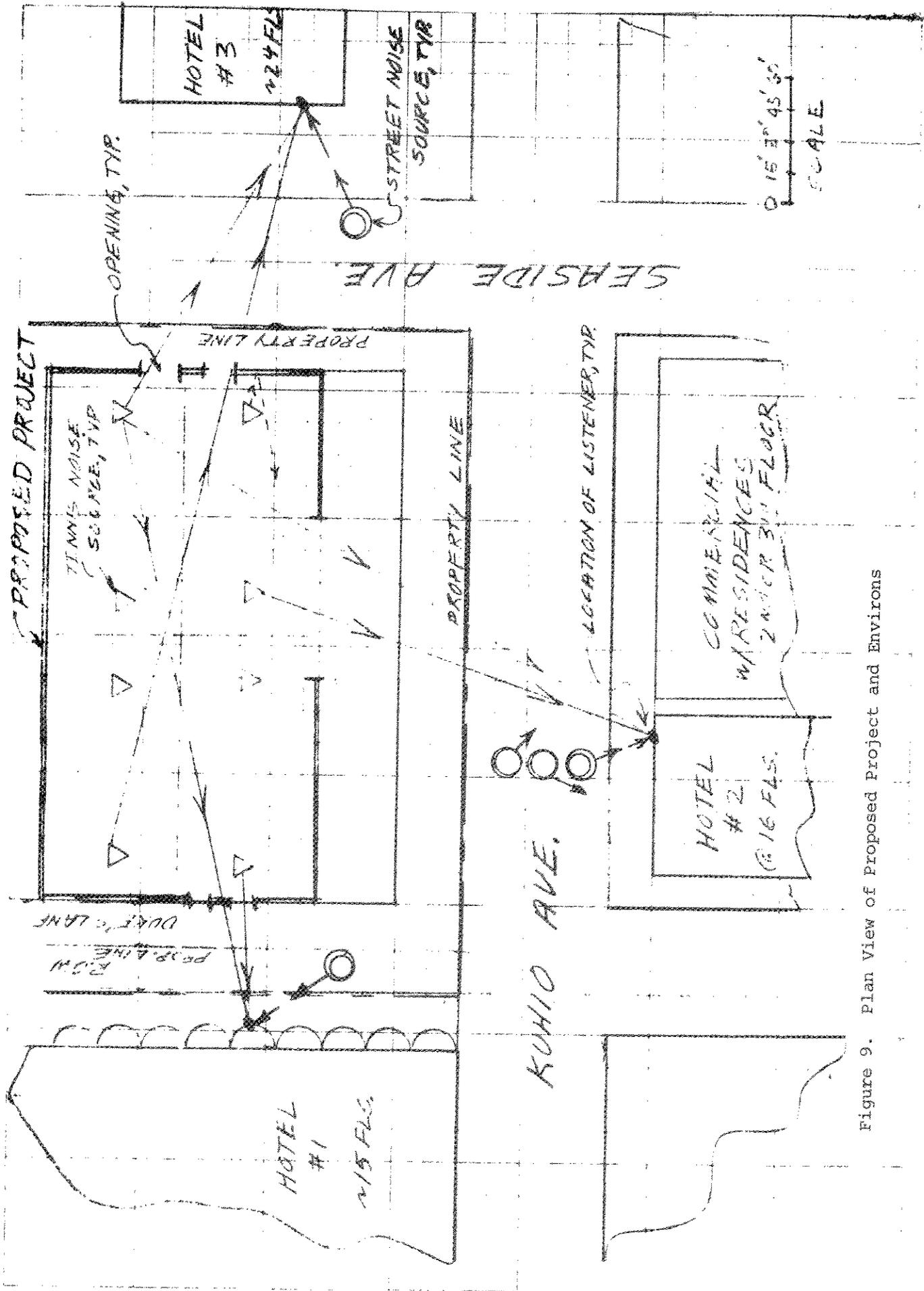


Figure 9. Plan View of Proposed Project and Environs

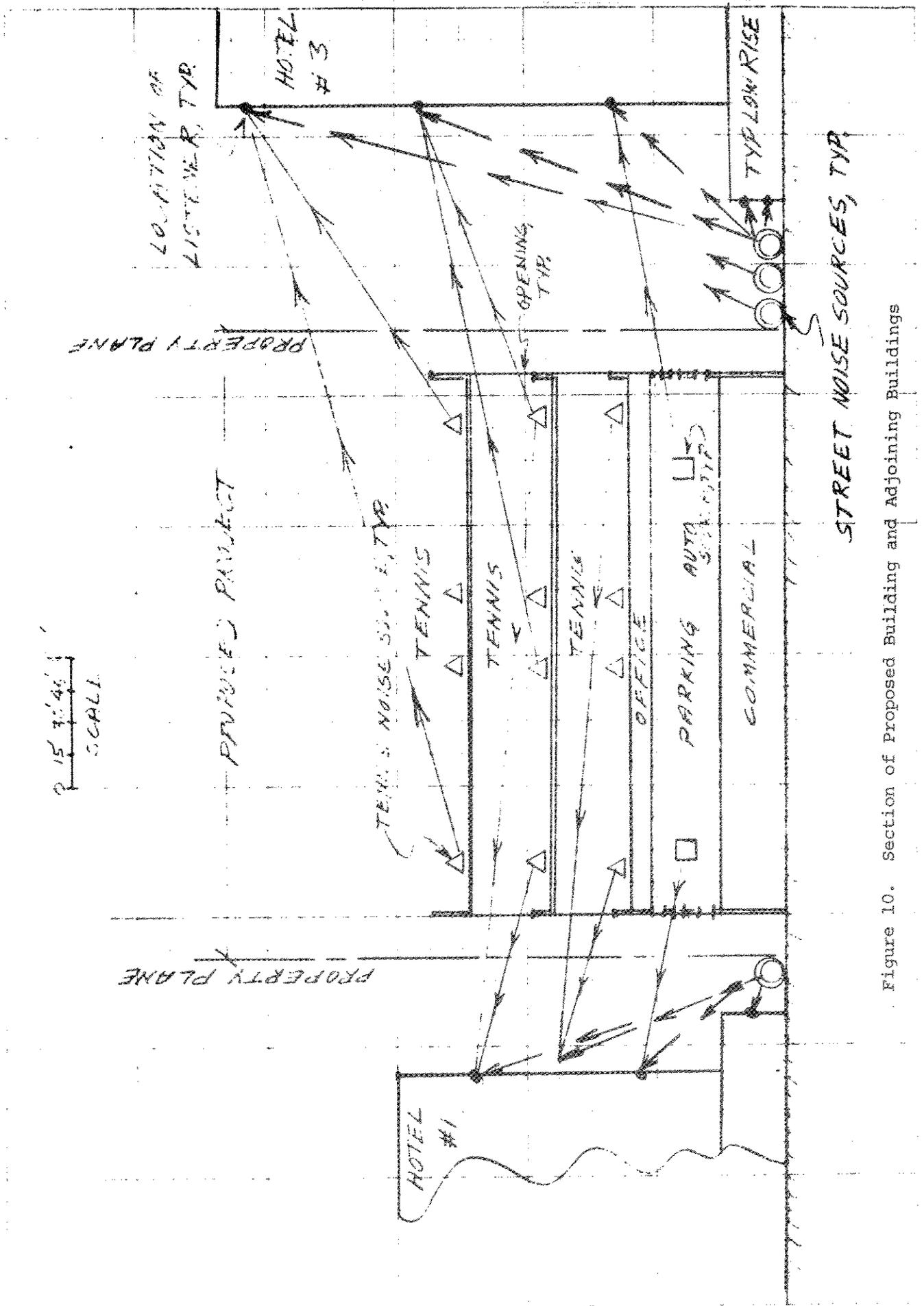


Figure 10. Section of Proposed Building and Adjoining Buildings

considers interior noise levels in sleeping quarters greater than 45 dBA as potentially detrimental to health and welfare based partially on sleep and rest interference criteria. In general, it will be assumed that the average occupant of hotels in this neighborhood will close their lanai doors and utilize the air conditioning systems to further provide masking noise over any residual intruding noises from the outside.

Figure 11 summarizes the noise measurements made and compares them with threshold noise limits in existing local noise regulations. It can be readily seen that the normal background noise levels in this neighborhood exceed the background levels; not the legal threshold limits. It is to be emphasized that the background levels are predominantly dominated by normal motor vehicles and people activities typical of those in a major urban resort area and not by the gross negligence of violators of noise regulations.

Construction Noise. The noise associated with the demolition of the building will be evident for a very short period. (Normally the demolition and clearing away of the building takes place within one work week.) It is anticipated that the hotel on the site will be demolished by conventional methods, i.e. bulldozer or wrecking ball.

The economic effects of the anticipated construction noise on the adjacent hotels have been evaluated in public hearings conducted by the Department of Health in determining acceptable levels of construction noise in an urban setting. All construction companies are required to employ all practicable means to mitigate noise impact on adjacent residential sectors. The actual economic impact of this specific project on the adjacent hotels has not been examined.

The Characteristics and Level of Noise From Tennis Activities. Analysis of sounds from tennis activities shows the primary noise sources are voice communications (and exclamations); the impact of the ball on the racket; and

the impact of the ball on metal fencing. Based on noise measurements of various tennis court conditions, it was concluded that the potentially dominant intrusive noise source with the tennis activities in the proposed project is the human voice, yet the distinctive ball impact noise may serve as a basis for annoyance for some individuals.

The Projected Noise Impact of Tennis Activities on the Neighborhood. The sounds in the proposed tennis spaces shown in Figures 11 and 12 will be the voices of the players and the impact sound of the ball on the racket. The total sound level is of course highly variable depending on the number of people playing tennis, how good they are at the game, and how vocal they are.

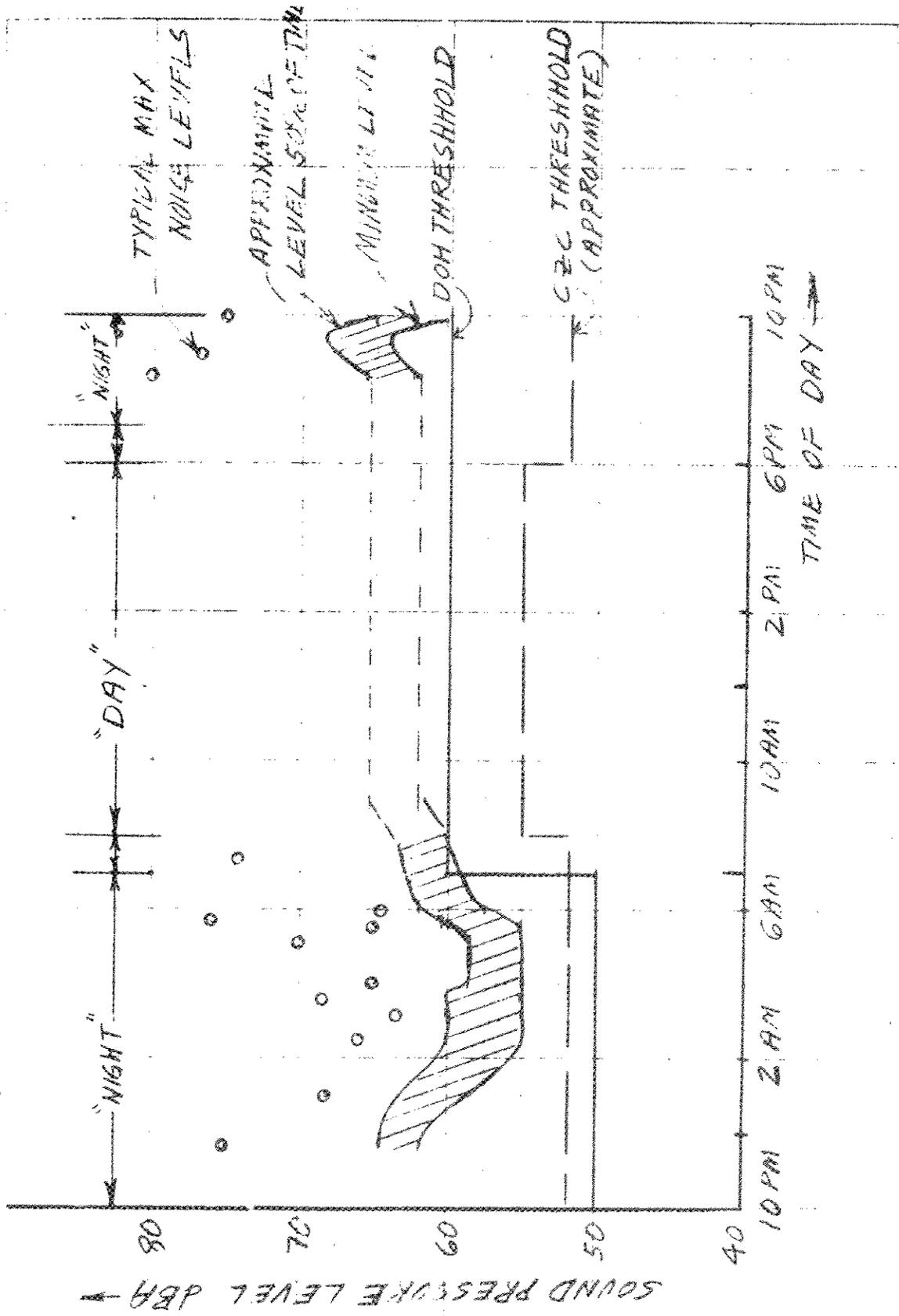


Figure 11. Summary of Background Noise Measurements from 12th Floor Lanai of Hotel Adjoining the Project Site

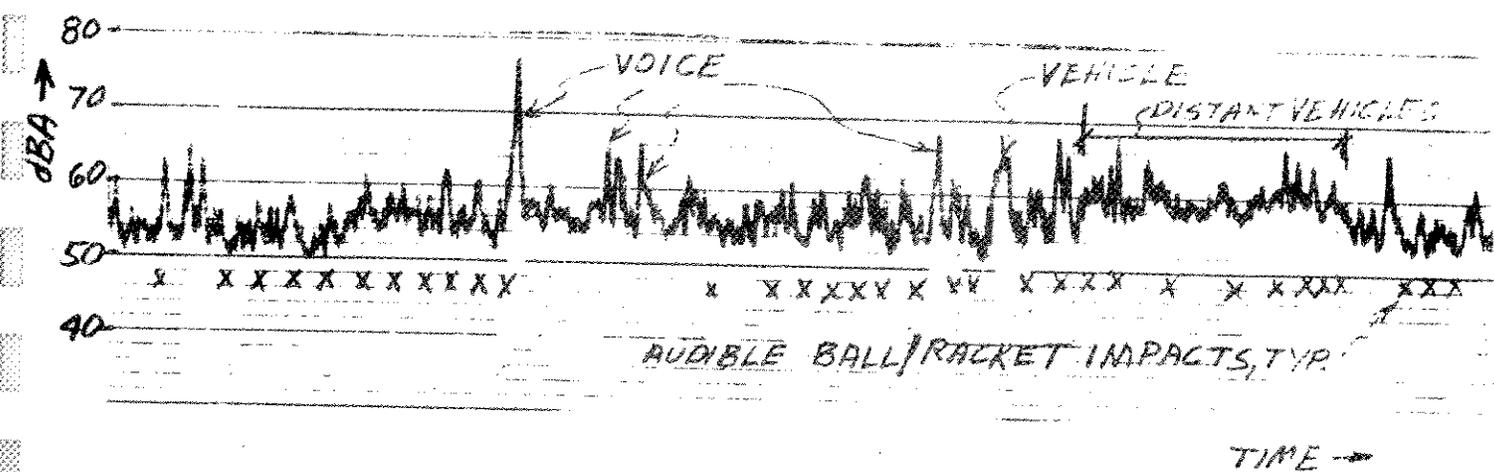


Figure 12a. dBA vs. Time Plot, Kailua Recreational

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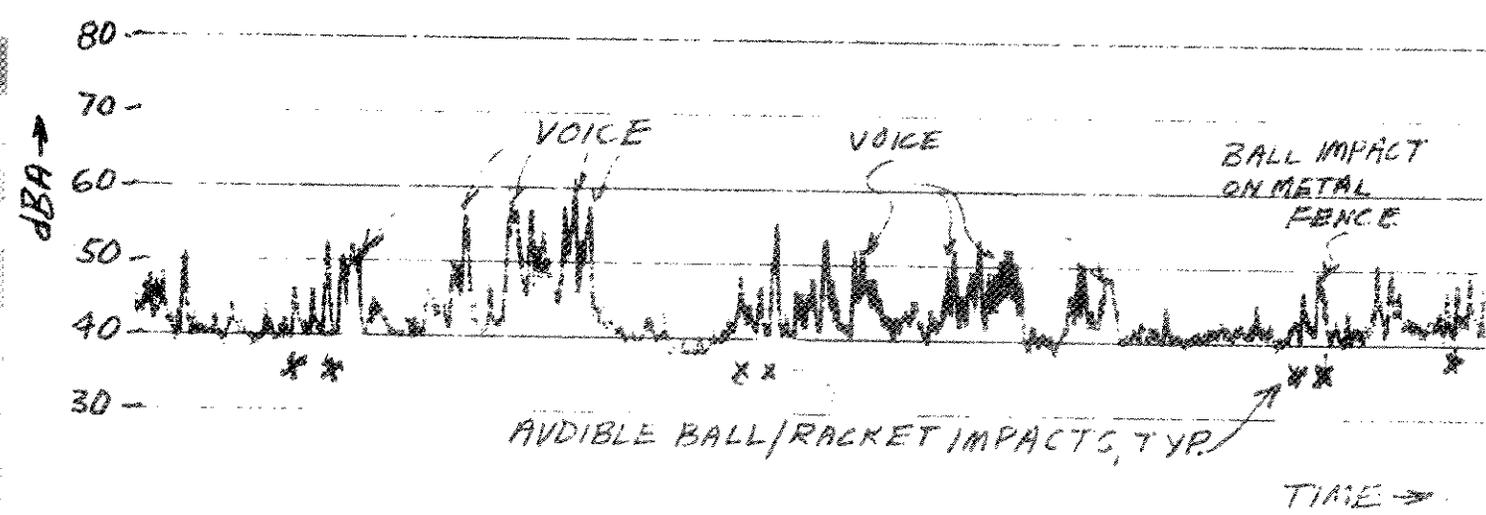


Figure 12b. dBA vs. Time Plot, Kaneohe Yacht Club

It seems reasonable to assume the noise level record in Figure 12 would be a typical, maximum worst case for the roof top tennis activity. These sounds from the roof top tennis playing should never be heard at street level or in the neighboring low rises because no direct sound transmission paths exist and the residual levels reaching the street will be less than the existing background noise. It is also believed that during the day-time the background noise from the streets will mask roof top tennis activity sound on the lanais of all the adjoining high rises. At nighttime, roof top tennis noise may be discernable on the lanais of Hotel #1, depending upon the detail relationship between the two buildings and the acoustic shielding from a parapet wall.

Sounds emanating from the openings in the enclosed tennis spaces will be similar in level to those from the roof top and will generally be masked by the background noise at all locations except at night for locations on certain lanais on Hotel #1 when the tennis courts nearest the hotel are used. For this situation, during the quietest period (2 AM to 6 AM), noise levels equal to the background level may occur on these lanais. Assuming that hotel guests will have their lanai doors closed, there should be no interference with sleep. When the high background noise is taken into account, the DOH noise regulations should not be exceeded by tennis activity noise at any property plane.

Preliminary Evaluation and Recommendation for Parking Operations Noise.

Tire squeal noise in indoor parking structures has been the cause of complaints from persons residing in adjacent properties in Hawaii where year around open windows are the norm. Tire squeal is produced by high-frequency vibration of tire-tread elements when cornering a vehicle. The factors which influence the inception and intensity of tire squeal noise include: road surface texture, vehicle forward speed, vehicle weight, tire-tread design, and slip angle (difference between tire steering angle and direction of vehicle movement).

In order to investigate the severity of the problem, simple acoustic measurements were made in the Gold Bond and Hawaiian Regent parking garages. A 1975 Ford Granada (4-door sedan) was used to generate tire squeals at 2 to 15 MPH. Based upon the observations made, rough projections were made of probable noise impact caused by tire squeal in the proposed facility.

1. Parking Areas

Peak noise levels of the squeals produced within the parking areas will probably exceed DOH day-time and night-time threshold levels of 60 and 50 dBA respectively at the property planes along Duke's Lane, Kuhio Avenue, and Seaside Avenue. This is due to the high peak source levels of the tire squeals (70 to 90 dBA), the reverberant nature of the parking garage, and the openings in the building's exterior walls fronting these property lines. The duration of the tire squeal noise above the DOH threshold levels during hard cornering could range from 0.5 to 2 seconds. On the assumption that only rough textured concrete surfaces (coarse brush finish) are used throughout the vehicular circulation paths within each parking level, tire squeal noise should be limited to vehicles cornering at speeds in excess of 10 MPH. Assuming a maximum duration of 2 seconds above DOH thresholds per tire squeal, it would require the generation of an average of 3 squeals per minute during a 20 minute time interval to theoretically violate the DOH regulations. It is possible that a violation could technically occur since each property line would be exposed to three levels of parking and a minimum number of 4 turns is required for the vehicular circulation pattern per level. Therefore, in the worst case of 15 speeders within the three parking levels per 20 minute period, DOH noise regulations could be technically violated

at the three property planes of interest. In order to avoid this possibility of DOH rule violation, the probability of high speed (in excess of 10 MPH) cornering should be reduced by controlling the width and turning radius of the cornering rights-of-way in the circulation paths and/or by the introduction of speed bumps. Whichever method is selected, the use of a rough textured surface in combination with speed control should be sufficient to reduce tire squeal noise impact probabilities to negligible levels in consideration of the background noise levels at the project site.

2. Up/Down Ramps:

Though the circular ramp is enclosed and is near the center of the building, consideration must be given to tire squeal noise causing a strong reverberant field and emanating from the top and bottom openings. The Down Ramp has a significantly smaller inner curb radius (14.7 FT) than that of the Gold Bond Building (20.6 FT). Because of this shorter turning radius, lateral forces on a vehicle like the 1975 Granada should increase by approximately 40%. Hence, tire squeal may occur at speeds as low as $\frac{102}{(20.6)} \times 14.7 \times \frac{1}{2} = 8.5$ MPH for a vehicle comparable to the Granada on a rough textured ramp surface. Due to the larger turning radius of approximately 27.2 FT, Up Ramp speeds less than 11.5 MPH should not generate 1975 Granada tire squeal noise for rough textured surfaces. Hence, the Down Ramp appears to be the worst case of the two in respect to the possibility of tire squeal generation.

Noise abatement measures such as the following should be considered:¹

¹ These suggestions are not meant to imply definite solutions to the Down Ramp tire squeal noise impacts which may occur. However, it is felt that the intrusive noise impacts can be reduced to acceptable levels in view of the high background noise levels characteristic of the site in Waikiki.

- a. Increase the lateral incline (bank) of the down ramp by approximately 5° greater than that of the down ramp in the Gold Bond Building to reduce the increased lateral forces on the tire treads caused by the shorter turning radius.
- b. Use circumferential rather than radial brush strokes on the concrete ramp surfaces to increase the lateral coefficient of friction and to reduce the slip angle, and hopefully increase the maximum speed at which tire squeal occurs.¹
- c. Research and use alternate ramp surface material (asphaltic concrete for example) which may have more desirable tire squeal properties than concrete.
- d. Use positive speed control devices.²

Conclusions and Recommendations. The following conclusions were made in regards to the noise impact of the proposed project:

1. The noise emanating from the proposed project will not be detrimental or excessive and will generally be masked or blend in with the background noise in the neighborhood.
2. Under normal use, the noise from the parking operations and the tennis activities will not violate DOH regulations.

It is recommended that:

1. All practical efforts be made to reduce tire squeal in the ramp and parking area as outlined above.
2. At night, the courts closest to Hotel #1 on all levels should not be used if there are noise complaints.

¹ Plans for the parking areas do incorporate this feature.

² Speed control devices (e.g. speed bumps) will be incorporated if there is a speeding problem.

3. No acoustic treatment be initially implemented, but if problems occur which management controls cannot resolve, implement the following noise abatement measures:

- a. Install solid shutters or doors on the openings in the tennis and parking spaces facing Hotel #1 which could be closed at night if there were complaints. Any solid material with a weight of at least one pound per square foot would be acceptable. Seals and gasketing are not necessary.
- b. Apply one inch average thickness of cellulose fiber spray-on (e.g. TCI-75 or K-13) on the upper wall surfaces in the circular parking ramp.
- c. Apply acoustic absorption material with a minimum NRC of 0.7 on the ceiling of the tennis spaces. This treatment would reduce the reverberant noise field by 5 to 6 dB in those spaces and because of communication between players would reduce the total emitted noise energy very significantly.

E. Socioeconomic Impacts

A report identifying the socioeconomic impacts of the proposed project was prepared by Robert N. Anderson, Ph.D., in June, 1977. Unlike the other two supportive reports cited earlier, this socioeconomic impact report is being provided basically in its entirety. This is being incorporated as such because (1) the nature of the data and its presentation is clearly understandable and does not entail technical jargon; (2) the data is summarized and succinctly discussed; and (3) the socioeconomic impacts are a major concern because it deals with resident relocation and economic aspects of the project. Because this report is included below, no separate, support study for socioeconomic impact is filed with the Environmental Quality Commission.

1. Present Socioeconomic Functions of the Property

The present socioeconomic functions of the property are basically in two categories - residential and commercial. The Seaside Surf Hotel is the sole "residential" establishment on the property, and six commercial enterprises presently use other portions of the property. The commercial uses include beauty salon, a hairstyling center, a small storage lot for a car rental firm, a lunchwagon, a jewelry vendor, and car rental operation which includes sales, carwashing and gasoline servicing facilities, and a sizeable storage lot.

Residential Function: The Seaside Surf Hotel is located in the makai-Ewa corner of the subject property. It is an older five-story apartment-type establishment (a two-story walkup structure Diamond Head, perpendicular to the five story building is also part of the hotel) which essentially rents on a monthly basis. In early May, 1977, at the time of our on-site investigation, 25 of the 39 units were rented. The balance were either being used for storage or could not be rented until necessary repairs were made. Rental rates were \$140 per month for the 13 occupied studios, \$170 for the 10 occupied one-bedrooms, and \$300 per month for the two two-bedrooms.

The accompanying Tables 4 through 10 are somewhat self-evident in their description of the residents of the property. (Residents of 2 of the 25 units were not found at home during four call-backs, so the data describe only the residents of 23 of the 25 occupied units.)

The basic observations obtained from these seven tables are: (1) about half of the occupants were young (25 years of age or younger), with a fairly even age distribution for the rest; (2) two out of three were

Table 4. NUMBER OF PERSONS PER UNIT

Persons per Unit	Units
One	13
Two	9
Three	0
Four	<u>1</u>
Total Units	23

Table 5. TYPES OF OCCUPANCY

Household Type	Units
One Person	13
Husband-Wife	1
Two Relatives (parent, sibling)	2
Not Related, occupying same unit	<u>7</u>
Total	23

Table 6. AGE, SEX AND LENGTH OF RESIDENCE IN SEASIDE SURF HOTEL

Age	Length of Residence								Total						
	Less than 2 months		2-6 months		7-11 months		1-3 years			3+ years					
	Male	Female	Male	Female	Male	Female	Male	Female		Male	Female				
Under 18								1							1
18-25	4	6	1	1	1	1									14
25-34	1		2				2	1							6
35-44			3				2								5
45-59	1		1	1			1		1						6
60+									1			1			3
Subtotal	6	6	7	2	2	1	3	6	2	2	0	2	2	0	35
Total	12		9		4		8		2			2			35

Table 8. MONTHLY INCOME PER RESIDENT

Less than \$300 per month	9	(4 retired; 1 disabled)
\$300-\$500 per month	9	
More than \$500 per month	8	
Unemployed	4	
Under eighteen years of age	1	
Refused to respond	<u>4</u>	
Total	35	

Table 9. ETHNIC BACKGROUND

Haole (Caucasian)	31
Hawaiian	1
Other, non-local	2
Not stated	<u>1</u>
Total	35

Table 10. OCCUPATION

Artist, Designer, Decorator, Actor	7
Hotel and Restaurant Service	9
Tour Director, Pedicab Driver	3
Office and Sales	3
Other (Student, Nurses' Aid)	2
Retired, Disabled, or under 18	7
Unemployed	<u>4</u>
Total	35

short-term (less than three years) residents of the State of Hawaii, and one-third of the occupants had been in the state less than a year; (3) only nine of the residents (one-fourth) had resided in the hotel for more than a year, indicating a highly transient population and a rapid turn-over in the occupancy of most units; (4) 20 out of the 23 apartments were occupied by persons living alone (13 units) or by persons who are neither conjugal nor affinal kin (7 units); (5) the income level of the apartment dwellers was fairly low (twenty-six persons receive salaries or pensions, and eighteen of this number received \$500 a month or less); (6) most of the occupations indicated were of the semi-skilled or non-skilled categories not requiring a great amount of preparation on the part of the worker and requiring little effort for training for these positions (which are thus easily filled when an employee terminates); (7) all but four of the residents were haoles (Caucasians); (8) only one was receiving government welfare assistance. Because of the high turn-over rate and the older age of the long-term residents, no real sense of community has developed at the hotel. The most that could be said in that regard is that the tenants seem to get along well together within the complex.

In summary, the typical profile of the resident of the apartment would be that of a young (under twenty-five) male or female houle who has recently arrived in Hawaii, employed at a low-paying job (either not possessing the skills needed for a higher paying job or not yet able to locate a higher paying job utilizing the skills possessed by the person). It can also be assumed that the average person would vacate the hotel within the next twelve months. However, it must be also pointed out that the above profile (especially regarding length of

residence in the hotel) is not typical for about one-third of the occupants, and any broad generalization regarding the establishment must also take these persons into account.

Commercial Functions: The beauty salon is located on the bottom floor of the Seaside Surf Hotel facing Seaside Avenue. There is one full-time employee and the owner/manager who works part-time. The clientele consists of about half tourists and half Waikiki residents.

The hair-styling center is located on the makai side of Kuhio Avenue. The firm has another location in Kailua. The structure being used on the subject property is an older two-story cottage of approximately 1,000 square feet, which has been remodeled to accommodate the business. The proprietor has stated that \$10,000-\$15,000 has already been spent on improvements to the location, with more planned if the firm could be certain of remaining at the present location. The shop has eight hair specialists employed on a full-time basis, in addition to a full-time secretary and receptionist. It is estimated that gross sales range between \$240 and \$800 per day. The shop is open 6 days per week.

A car rental firm's sales office, car-wash, gasoline and storage area presently occupies the largest portion of the property. The firm's management indicates that sales and employee numbers would not be negatively impacted by having to relocate, so a description of those aspects of the present operation would not be germane to this study.

The lunchwagon is a camper that has been converted by the owner-operator into a fast food "station" operating on the mauka-Diamond Head corner of the property that is sublet from the car rental firm.

The hours of operation are from 7:00 p.m. to 3:00 a.m. daily. The owner is the sole employee. Sales are hot sandwiches and soft drinks sold mostly to tourists walking along Kuhio Avenue.

Another car rental firm presently uses about 6,000 square feet of the property adjacent to Seaside Avenue for storage purposes. Approximately fifty cars were being stored at this location.

A jewelry vendor, selling necklaces and other assorted Hawaiian trinkets, is located along the sidewalk facing Seaside Avenue. One person is employed and sales are almost exclusively to tourists. The vendor indicated that it was a desirable location, but not as good as those located along Kalakaua Avenue.

2. Anticipated Impacts

The impacts of a socioeconomic nature within the context of this report are limited to (a) the dislocation of the present residents, (b) the effect on commercial tennis facilities, (c) the dislocation of present commercial tenants, (d) the accompanying increase competition for certain commercial activities in the Waikiki District, (e) the impacts of the office facilities, and (f) the impacts of jobs created by the project.

Residential Impact: Tables 11 through 15 summarize the perceptual, emotional, and attitudinal effects of the anticipated displacement of the 35 residents in the 23 apartment units surveyed. Basically, the tenants considered the building to be economically, socially, and locationally desirable. A majority of the tenants are not pleased with the prospects of relocating, for 74 percent indicated they had not anticipated relocation prior to 1978, unless they are forced out

Table 11. WHAT ARE SOME POSITIVE ATTRIBUTES OF THE SEASIDE SURF HOTEL?

Item	Responses (some persons gave more than one)
Low rent and costs	15
Convenient (near work, in Waikiki, close to "where it's at")	23
Desirable place to live (good neighbors, clean, safe neighborhood)	14
Special attention from the hotel	3
No particular reason	1

Table 12. AWARE OF PLANS TO DEMOLISH THE SEASIDE SURF HOTEL?

Not at all	10
Some, but don't know details	11
Yes, in detail	<u>2</u>
Total	23

Table 13. IF YOU HAD TO LEAVE THIS HOTEL, WHERE WOULD YOU CHOOSE TO RELOCATE?

Waikiki	18
Elsewhere in Hawaii	1
Mainland	2
Uncertain	<u>2</u>
Total	23

Table 14. RELOCATION WOULD BE CAUSED BY PROPOSED DEVELOPMENT?

Yes	17
No	4
Uncertain	<u>2</u>
Total	23

Table 15. SERIOUS HARDSHIPS IN CASE YOU MUST RELOCATE?

Yes, financial	10
Yes, emotional	2
Yes, it is hard to find a new place	8
No	<u>8</u>
Total	28 (some persons responded more than once)

by the proposed development. On the other hand, residents of one-third of the units indicated that forced relocation would not pose serious hardships for them, generally because they anticipated moving anyway.

The data shows that the apartments have been used as a somewhat short-term place of residence for most of the tenants, who are self-supporting, but often with fairly low incomes. The major problem faced by the present tenants due to their forced relocation would be financial in nature. They realistically perceive very few opportunities to find equivalently located housing at similar prices. Further, many are particularly concerned that they would be forced to pay far higher deposits than the nominal amounts required by the Seaside Surf Hotel.

In summary, the residential impact would be clearly to negate the present functions of the apartment complex, which have been: (1) to provide a place to live for new residents of Hawaii recently arrived from the Mainland during the interim period between their arrival and the subsequent consolidation of employment and social contacts that enable them to move to a more permanent location; and (2) to provide the few long-term residents with what they consider desirable places to live at a price lower than would be charged at similar locations. Also, the approximate full-time-equivalent jobs presently associated with the rentals would be lost.

Tennis Impact: A total of 12 tennis courts are to be built in the proposed project - four outdoor and the rest indoor. Present plans call for the courts to serve the guests of one or two major Waikiki hotels and thereby essentially provide the hotels with added guest

facilities, although Hawaii residents and guests of other hotels would also be accommodated at a higher court fee. At present the resident and tourist populations of Waikiki generally play tennis at six different locations - 3 private and 3 public. The private facilities are at a Waikiki hotel (Ilikai), a site near the airport (Tennis Factory), and another on King Street. The public facilities are the Diamond Head Tennis Center, the Ala Moana Park Courts and the Kapiolani Tennis Courts.

The private hotel facility in Waikiki presently has seven courts available to both hotel and non-hotel guests. The hotel offers no regular transportation service for non-guest players. Generally speaking, these courts are not used at full capacity except from 8:00-9:00 a.m. and 4:00-5:00 p.m. Court fees are \$3.00 per hour for guests and \$4.00 per hour for non-guests. The hotel offers limited tennis "packages" and some conference tennis tournaments, although plans are being made to increase such activities in the future. This particular hotel advertises itself as a "tennis resort", so it would seem that a tennis-playing tourist vacationing in Waikiki would tend to stay there.

One possible explanation for the lack of intensive use is the hotel's poor location with respect to the "heart" of Waikiki. However, given the fact that a private non-Waikiki facility draws more than half of its business from Waikiki tourists, location per se is not a full explanation. In contrast to the hotel facility, the non-Waikiki facility provides free transportation to and from its location. However, this is not considered to be a sufficient explanation. A more adequate

explanation is the natural reluctance of competing hotels to send their guests to the site of a competitor, even if it is just to use the tennis facilities, simply because of the very real possibility of losing them to such competition. In contrast, they are not reluctant to send their guests to independent, non-hotel tennis facilities, such as the non-Waikiki facility.

If the tennis courts at the Waikiki hotel were being used to full capacity, one could reasonably assume that there exists an "unfulfilled" demand for resort tennis in the Waikiki area. Such, however, is not the case. Thus, any additional tennis complex in the Waikiki area would lessen the appeal of one of its amenities which presently draws guests to that particular hotel.

It was concluded that the proposed facility will negatively affect this Waikiki "tennis resort", but only slightly. The lack of detailed data available to us prevents us from making a more specific conclusion.

The tennis complex located in the industrial area near the airport has 3 indoor and one outdoor courts, plus 6 practice lanes. Due to its distance from Waikiki, the operation appears to be unappealing to tourists, especially considering that no transportation to and from Waikiki is provided by the operation, although plans are being made to do so for a fee in addition to the regular court fees. In any case, it appears that the management of the complex is directing most of its marketing efforts to the resident market rather than to the tourist market. The present operation charges high court fees for non-members, including tourists (\$12.00 per court per hour except between midnight and 7:00 a.m. when it is 1/2 price). Recent promotional efforts to sign

up members have included offering cheaper rates for the first 75 people who purchase memberships in specific membership classes, and the current promotional tie-in with a local savings and loan association. There have been some promotional efforts to attract tourists by placing brochures in certain hotels, but our observations indicate they have generally been unsuccessful, since the major portion of the users of the facility are members, or at least non-tourist patrons.

Given that the proposed facility, in terms of tennis, is predominantly directed at the non-resident market, and given the apparent inability of the tennis establishment near the airport to effectively reach the tourist market, it seems unlikely that the proposed tennis facility will noticeably affect this tennis site. Whether it fails or succeeds, such eventualities could not be attributed to the proposed facilities.

Another commercial tennis complex is located atop Payless Store at 2220 South King Street. There are four lighted outdoor courts, one automatic ball machine alley, lockers, showers and restrooms. Hours are 8:00 a.m. to 10:00 p.m. seven days a week. A \$25.00 per year membership fee reduces the court fees to \$3.00 per hour for members, versus \$4.00 per hour for non-members. Transportation is provided at no charge for tourists from Waikiki to the facility. Patronage appears to be about half tourists and half residents. Hotel guests using the facility generally come from the Kahala Hilton, the Hyatt Regency, and the Sheraton Waikiki. Court usage is heaviest on weekends (mostly non-tourist players), week-day early mornings (8:00-11:00 a.m.), and evenings (3:00-10:00 p.m.).

The negative impact of the proposed tennis facility on the King Street

courts, given the fact that the target market for both consists largely of tourists, would most probably be substantial. However, the possibility exists that the King Street courts may be able to effectively compete with lower court fees, despite the greater distance from Waikiki, although, the "time" cost of going to the King Street courts (transportation fees are not charged) may be sufficient to dissipate possible court fee disadvantages of the proposed facility. Only actual experience will demonstrate the relative magnitude of these market considerations. Nevertheless, it is entirely possible that the King Street courts would be forced out of business by the existence of the proposed facility. On the other hand, if the airport tennis facility were to close, the King Street courts could possibly continue as a viable business by picking up a portion of the former clientele of the complex near the airport.

The public facilities primarily affected by the proposed facilities are the Ala Moana Park Courts (10 unlighted outdoor courts), the Diamond Head Tennis Center (7 unlighted, outdoor courts), the Kapiolani Tennis Courts (4 lighted, outdoor tennis courts). These courts, as is the case at most public tennis facilities on Oahu, are very heavily used. Approximate figures for daily usage are 350, 245 and 172 people per day, respectively, for the 3 facilities. The percentage of tourists at each facility is 40 percent at the Ala Moana Park facility, 15-20 percent at the Diamond Head Tennis Courts, and only a negligible number of tourists at the Kapiolani Park facility. Tourist usage undoubtedly would be substantially greater if there were not considerable waiting time to gain court access. The necessary waiting is such that an undetermined, but probably sizeable, number of tourists

and residents do not even attempt to use existing facilities. In other words, it is generally conceded that additional public courts would be justified in terms of meeting public demand for available courts.

A petition is actively being circulated by tennis players in the Waikiki, Diamond Head, and Ala Moana areas that urges Governor Ariyoshi to release funds for the construction of more courts in the area. The petition, in part, reads that "...tourists use facilities designated for local people. Specifically...in the Waikiki area." Furthermore, the petition states that "the demand on the courts would be tight if only the residents were to play, but with the addition of tourists, the situation is impossible. The Waikiki area has thousands of hotel rooms constantly in use, but these area hotels have only six tennis courts." In other words, residents are concerned about the tennis court situation in Waikiki, and to an extent blame tourists for this problem.

A possible solution would be to build more public facilities in the area. However, as was noted in a recent report prepared for the Department of Parks and Recreation, "recent experience has been that, as new courts become available, they are immediately filled and the number of players waiting isn't even reduced." In other words, the slight lowering in waiting time resulting from more available courts, combined with an increasing population draws out more players, and thus the shortage of courts is hardly alleviated. Furthermore, it appears unlikely that a substantial number of public courts in the Waikiki area will be added in the near future.

It can be concluded that the proposed facility would have a small positive impact on the present public facilities. However, it is not believed that waiting times will substantially decrease, for pent-up demand is so strong that diverted players will be replaced by others presently playing less frequently.

Commercial Dislocation: In examining the problems involved in the forced relocation of the present commercial tenants of the property, the initial conclusions made have been confirmed in interviews with the principals of the firms facing forced relocation. The following paragraphs represent an assessment of the dislocation impacts.

The hair-style center and the beauty salon would not be likely to re-open at new locations. This results in part from the lack of resilience capacity on the part of these firms, as well as from the economic losses that would be incurred. Both firms require rather specialized settings that are readily available to their clients. Such settings are rare, particularly at rental rates that leave the businesses as feasible enterprises. Closure would mean the loss of about 12 jobs, although a few jobs would develop in the Waikiki area in response to the increase in business to be experienced by competing, existing firms as clientele switch to these other firms. However, most of the employees thus displaced are likely to face difficulties in finding equivalent jobs, for there tends to be an "oversupply" of beauticians in Honolulu. Furthermore, both firms are not likely to retrieve a substantial portion of their respective investment in equipment and furnishings.

A final conclusion concerning the possibilities of relocation for the

jewelry vendor, the lunchwagon, or the use of the car storage space was unable to be reached. The outcome obviously depends on the success of these businesses in securing other locations and on the charges they would be paying. In any case, only two jobs are involved, and no capital equipment losses will be incurred.

No significant negative impact on sales or employment is likely for the car rental outlet. Given the resources of the firm, these activities will necessarily be relocated, with likely increases in operating costs. Since the new site is likely to be more remote from Waikiki, the firm may well be forced to increase its employee numbers slightly in order to effectively transport cars and customers to and from its new location. A particular problem facing this firm is to locate a site where gasoline storage and dispensing will be possible.

All in all, it was estimated that the net job losses due to displacement to total about 10. This does not account for the new jobs to be created by the proposed facility, nor does this figure allow for the multiplier effect, which would increase the impact to about 13.

Impact on Commercial Competition: In addition to the commercial impact on existing tennis facilities previously discussed, other commercial activities in the Waikiki area potentially may be hurt by the increased competition offered by the retail outlets to be housed in the proposed development.

Analysis of this impact is based on data from previous studies, as well as a few necessary, but reasonable assumptions. It is felt that the development will not noticeably affect sales levels at non-Waikiki outlets.

In other words, it is assumed that tourists lodged in Waikiki will continue to spend the same fraction of their daily expenditures outside Waikiki as they have in the past. (To the extent that this assumption is violated in reality, the analytic consequences are not considered significant, for it is anticipated that the bulk of the retail space in the project would be occupied by two retailers who are also prominent at Ala Moana Shopping Center. Consequently, the non-Waikiki commercial impact, excepting for tennis, may well be limited to the transfer of employees within existing firms as well as less shopping congestion at the non-Waikiki locations.)

The analytic procedure that follows is to estimate the expansion of demand for relevant retail services in comparison to the expansion of the supply of such business activities. The time period for these comparisons will be for 1974 to 1980. The beginning period is selected as a time in which most retail operations in Waikiki were experiencing relative prosperity. The ending year is selected because it is a realistic estimate of the date when the proposed development will be in operation.

Since 1974 the retail commercial space in Waikiki, excluding parking and office space, has been expanding rapidly. Proceeding in time from the 96,000 square feet offered by Hemmeter Center to the maximum estimate of 160,000 square feet at the Sanpo development now being planned, a generous estimate of such new space generated by 1980 would be 599,000 square feet. The proposed project would add another 58,000 square feet, for a total expansion in supply of 657,000 square feet.

The calculation of demand expansion over the same time period is a far

more complex effort, requiring estimates of tourist expenditures in Waikiki. In order to do this, the total tourists coming to Hawaii, the amount of visitor-days in Waikiki, the effect of a ceiling on the number of hotel rooms in Waikiki, the amounts such tourists spend at non-Waikiki locations on Oahu, and the amount of floor space required for the remaining Waikiki expenditures must be estimated. The following paragraphs deal with these estimations.

The total number of visitors to the state came to about 2,786,000 in 1974, which increased to approximately 3,220,000 in 1976. A recent econometric model constructed for the City Department of General Planning provided a conservative estimate of 3.9 million visitors to Hawaii in 1980. This figure was considered to be the very lowest of reasonable estimates, and thus it was used in examining the impact of the proposed facilities on existing retail outlets in Waikiki. (Less impact would occur in a period of more rapid growth.)

There is no reason to believe that the average characteristic profile will significantly change for Hawaii's visitors, but there is good reason to believe that Oahu's share of the total visitor days will decline, largely because of the limits on hotel room growth in Waikiki. This shift was estimated by conservatively estimating that the occupancy rates in Waikiki will not increase, but that the number of rooms will increase by about 2,500 from 1976 to 1980. Assuming that seasonal patterns do not change, this means that Oahu's share would decline from the .65 proportion in 1974 to about .59.

There are solid reasons to argue that daily expenditures will increase (due to expanding real incomes), as well as reasons to believe that a

decline will occur (due to a weakening in the quality of visitor profile). It was concluded that the best course of estimation is to assume that such expenditures will remain constant (in 1974 dollars). Also, it was assumed that the length of stay will remain constant, essentially for similar reasons.

As a practical matter, and as a part of our deliberately conservative approach, resident (non-tourist) purchases are not included in the following analysis. In any case, lack of data in this topic area could easily lead to errors of estimate that could actually exceed the actual magnitude of such impacts.

Table 16 shows the results of the estimating procedure for demand expansion as discussed thus far. The increased demand converts to the itemized amounts shown in Table 17. Earlier studies in 1973 by Real Estate Research Corporation are the basis for converting total expenditures on Oahu into itemized expenditures in Waikiki. It is felt that their original estimates are valid, and we consider that our application of them to the time period in question is a conservative estimating procedure. The figures for sales per square foot were derived from earlier research performed, and exceed the "rule-of-thumb" figures encountered in real estate circles. It was found that the resulting figure of increased demand for floorspace of 680,000 square feet was a highly conservative estimate that has proceeded from cautious estimating procedures.

Not all portions of the increased supply of floorspace will be used for the retail purposes noted in Table 17, for some space will be leased by banks, airline ticketing agencies, etc. Based on our knowledge there is

Table 16. TOURIST EXPENDITURES* ON OAHU, 1974 AND 1980

	Total Visitors	Length of Stay in Days	Oahu Share	Daily Relevant Expenditures*	Total Oahu Expenditures
1974	2,786,000	10	.65	\$28.21	\$510,945,000
1980	3,900,000	10	.59	28.21	649,112,000
Change	1,114,000	-0-	-.06	-0-	138,168,000

*Excludes room charges, ground and air transportation, and tours, in 1974 dollars.
 [Figures may seem inconsistent due to independent rounding.]

Table 17. INCREASED DEMAND FOR WAIKIKI COMMERCIAL FLOORSPACE,
1974 TO 1980, IN SQUARE FEET

Items	Oahu Share	Waikiki Share		Annual Sales per Square Foot	Demand for Commercial Floorspace
		Percent	Dollars		
Meals	\$59,218,000	x 65 =	\$38,492,000	÷ \$140 =	275,000
Clothing	27,329,000	x 55 =	15,031,000	÷ 150 =	100,000
Entertainment	16,946,000	x 85 =	14,404,000	÷ 150 =	96,000
Gifts and Souvenirs	23,410,000	x 75 =	17,558,000	÷ 100 =	176,000
Other	11,264,000	x 60 =	6,758,000	÷ 80 =	84,000
Total (or Average)	\$138,167,544	x 62 =	\$85,664,000	÷ 126 =	680,000

Note: Columns may not add due to independent rounding.

no reasonable method of estimating demand for such space, but such use will effectively lower the relevant supply.

Even if the projected supply of 657,000 square feet were to be used in the manner described in Table 17, the estimated demand for 680,000 square feet indicates that the expansion of supply is essentially balanced by an expansion in demand. Thus, it was concluded that the proposal by S & M Partners would not bring about significant economic impact on the owners of competing floorspace, including space already in existence or in the final planning stages. In economic terms, the market would be approximately in equilibrium, assuming that it was in 1974.

Office Facilities Impact: The proposal envisions providing either 70,000 or 35,000 square feet of office space. A defensible means of estimating the impact of this increased office space cannot be determined. The bulk of it will likely be used by one or two tenants that are presently housed in nearby offices. The apparent oversupply of office space in Downtown Honolulu seems to be rapidly dwindling, as business optimism leads to a willingness to expand office facilities, even as rental rates are increasing. This means that businesses which have the alternative of locating in Waikiki or Downtown will be tending to locate in Waikiki. However, it should be noted that the rental of office space in recent projects in Waikiki has been a problem for the developers, at least in comparison with the ease in renting suitable retail space. The lack of available reliable data on office space, occupancy rates, and the relation of demand for office space to increases in overall economic activity prevents us from reaching even

tentative conclusions about this type of impact. The only possibly useful estimate of demand for office space comes from industry "rules-of-thumb" which suggest that Honolulu can expect to absorb between 80,000 and 250,000 square feet of such space annually. The wide range of such figures and their lack of substantive base do not provide an opportunity for further analysis.

Employment Impact: An undetermined number of jobs will be involved in the construction of the project. Since these are essentially short-term in nature, the far greater job impact will be in terms of actually operating the retail businesses (not including office space, but including the parking and tennis facilities). It is not possible to estimate such number with precision at this time, since the final mix of tenants has not been determined. However, drawing from experiences elsewhere in Waikiki, operation of facilities within the proposed project (again excluding office space) is conservatively estimated to involve 300 full-time and 60 part-time jobs.

It would not be accurate to claim that this many jobs will actually be created by the project, for without it competing establishments would experience higher volumes of business (increased congestion from the tourists' viewpoint) and thus expand their employee numbers by a portion of the jobs that would otherwise be offered at the proposed project. A more accurate statement would be to say that such jobs are created by the increased demands of the tourist sector of the economy. The proposed project is one of many normal responses of the commercial market to such increased demand. The project would thus facilitate the conversion of such increased demand into sales and jobs in the state's economy.

3. Intended Tenant Mix

Our analysis of impact also leads us to conclude that the intended mix of tenants is likely, simply because the marketing appears feasible. Overall, the mix of tenants anticipated by the developer to be realistic and in line with the realities of present and anticipated available floorspace in the Waikiki District as well as being in accord with conservative estimates of economic demand for floorspace geared to serve the Waikiki tourist market.

The decision between the two alternative use mixes will depend on whether agreement is reached with a major hotel to lease the 12-court tennis facilities over a long term. The spreading of investment risk would be appealing from the developer's point of view.

F. Impact on Transportation

Existing Highway System. The existing highway system serving the Waikiki District is shown on Figure 13. The streets in light lines are local streets primarily for access to abutting properties and are intended for local traffic. The local streets have been included to relate its effect on the major highway system and its impact at the local level. However, with the conversion of the street system to a one-way operation, the traffic load is spread over more streets, and these local streets assume the role of major collector streets.

Except for Ala Moana Boulevard, a Federal-aid highway, the existing highway system is administered by the City and County of Honolulu. As shown on the plan, the major highway system consists of Ala Moana Boulevard, McCully Street, Kalakaua Avenue, Kuhio Avenue, Ala Wai Boulevard and Kapahulu Avenue.

Future Highway System. The future highway system is set forth in the Waikiki Special Design District Plan and is shown on Figure 14. Since the existing highway system establishes the foundation of the future highway system and

these highways must continue in use, the future highway was developed by the addition of new facilities built onto or added to the existing system with improvements to the present highways of higher standards and designs for future traffic volumes. With these improvements, the future highway system will mitigate at a future time, any possible undesirable traffic congestion.

The future highway system proposed the widening of several streets and the extension or construction of additional new facilities. Streets proposed for widening include Kalia Road, Kalakaua Avenue, Ala Wai Boulevard and Kapahulu Avenue. Kuhio Avenue from Kaiulani Avenue is proposed to be widened and extended to connect with Kapahulu Avenue. A major Waikiki by-pass route along the mauka side of the Ala Wai Canal is proposed to connect Ala Moana Boulevard and the H-1 Freeway to reduce the through traffic. Thus, the major highway system to serve the Waikiki District has already been planned, providing the District with a workable and well integrated system.

Impact on Traffic Volume. For the Waikiki District only, traffic counts obtained from various traffic surveys conducted by the Department of Transportation Services of the City and County of Honolulu (Table 18) show that traffic crossing the Lewers Street Screenline extending from Kalakaua Avenue to Ala Wai Boulevard increased at an even lower rate of 1.32 per cent per year for the period from 1967 to 1975.

With the establishment of the Waikiki Special Design District regulating land use and growth, traffic crossing the Lewers Street Screenline should be considerably lower than the present rate of 1.32 per cent per year. With a 66.9 per cent reduction in hotel rooms than is permitted under existing zoning, the rate of growth of traffic should not exceed 0.44 per cent or less than one-half per cent per year. The 0.44 per cent increase per year is equivalent to an increase of only 8.8 per cent or 7,873 vehicles crossing the screenline within the 20 year period from 1975 to 1995.

Table 18.

24 Hour Traffic Volumes
Lewers Street Screenline

Year	Ala Wai Blvd.	Kuhio Avenue	Kalakaua Ave.	Total Screenline Count
1975	30,351	22,647	36,473	89,471
-----	-----	-----	-----	-----
1973	30,816	19,725	33,493	84,034
-----	-----	-----	-----	-----
1971		15,413*	30,061*	
1970		15,118	36,648	
-----	-----	-----	-----	-----
1967	26,024	17,146	37,729	80,899
-----	-----	-----	-----	-----
1963	16,070			

* Converted to one-way operations

Table 19.

Peak Hour Volumes - 1975

<u>Ala Wai Blvd.</u>	<u>Kuhio Avenue</u>	<u>Kalakaua Avenue</u>	<u>Total</u>
1,913	1,345	2,200	5,458

To assure that a sufficient margin of safety is built into the analysis, the present and higher rate of growth of 1.32 per cent per year will be used so that this rate of growth will still be valid for the future. At the rate of growth of 1.32 per cent per year, the traffic volume crossing the screenline will increase by 26.4 per cent or 23,620 vehicles within the 20 year period from 1975 to 1995 for a total screenline volume of 113,091 vehicles. Assuming the worst situation whereby the increase in traffic will be equally distributed between Kuhio Avenue and Ala Wai Boulevard, the capacities of these streets will be able to accommodate the additional traffic volumes.

The existing capacities of the major streets in Waikiki may be considered to be equal to its peak hour volumes. The 1975 peak hour volumes at the intersections are shown in Table 19.

These capacity figures, however, are conservative when compared to the maximum observed traffic volumes recorded as early as 1961 on similar classifications of highways throughout the United States. On four-lane one-way highways, (Ala Wai Boulevard, for example) the highest hourly volumes ranged from 653 vehicles per lane to 958 vehicles per lane. These are average volumes per lane, so that the total hourly volumes for the four lanes ranged from 2,612 vehicles to 3,832 vehicles. On five-lane one-way highways, the highest hourly volumes ranged from 477 vehicles per lane to 619 vehicles per lane for a total hourly volume ranging from 2,385 to 3,095 vehicles. It may be pointed out that one of the major streets in the United States reporting the highest hourly volume in 1961 on a five-lane one-way highway is South King Street in Honolulu, Hawaii. In 1961, South King Street recorded an average volume of 619 vehicles per hour per lane and an ADT of 30,000 vehicles. From traffic counts conducted by the Department of Transportation Services of the City and County of Honolulu in 1972, South King Street recorded a total peak hour volume of 3,521 vehicles for an

average volume of 704 vehicles per hour per lane, and an ADT of 37,387 vehicles.

Assuming the 26.4 per cent increase in traffic volume will occur by 1995, the peak hour volume at the screenline will rise from 5,458 to 6,899. With equal distribution between any two combinations of streets, Kalakaua Avenue and Kuhio Avenue or Kuhio Avenue and Ala Wai Boulevard, each street must be able to accommodate a peak hour volume of 3,450 vehicles. Inasmuch as all the major streets are or can be converted to a four-lane one-way street, their actual total capacities for each street will range from 2,612 to 3,832 per hour, based on the assumption that the actual capacities of the major streets in the Waikiki District will be within the range of 653 to 958 vehicles per hour per lane as observed in 1961 on similar classifications of highways throughout the United States. The existing highway system, therefore, will be able to accommodate the present as well as the future traffic volumes, with no consideration being given to the beneficial consequences resulting from the establishment of the Waikiki Special Design District.

The future highway system will mitigate at a future time, any possible undesirable traffic congestion. Other factors also will influence and mitigate at a future time any possible undesirable traffic congestion. These include the following:

1. Should visitor arrivals exceed the capacity of the ultimate number of hotel rooms limited by the Waikiki Special Design District, much of the living units occupied by permanent residents will be converted to tourist use. Tourists own or drive very few automobiles.
2. Since traffic seeks its own level, much as water, the motoring public will find its own alternate route and avoid the Waikiki District.
3. The energy crisis will encourage the trend towards smaller cars and the use of public transportation.

Distribution of Traffic - Peak Hour. Using the data from the traffic volume counts, the variations in daily time patterns may be illustrated as shown in Figure 15. Unlike most urban or rural highways, the travel pattern on the streets of Waikiki does not depict two distinct peak travel periods, usually one in the morning and one in the afternoon. Instead, the duration of the peak travel period extends for a longer period of time. For Kalakaua Avenue, the peak travel period may be said to begin at 8:00 a.m. and extend over the entire period until 6:00 p.m. in the afternoon. In fact, the morning peak hour does not occur until midday, between 12:00 noon and 1:00 p.m. This longer period represents not only travel to and from home or the hotels but also non-home based travel to Waikiki.

This special characteristic is of greater importance in determining the ability of the streets to accommodate an increased volume of traffic without exceeding the capacities of the streets. The significant difference in peak hour characteristics would result in an equalization and spacing of the traffic load. Resort facilities to accommodate primarily the tourists, therefore, will cause only a mild traffic impact on the highway during the peak commuting hours. Typically, the peak commuting hours on a highway are hours of subdued activity at a resort facility. The peak hour of activities at a resort facility occurs during the daytime between the peak commuting hours of a highway or during the evening hours, with the daytime peak hour being a higher percentage of the evening peak hour.

Parking is a major problem in vehicular transportation and the Waikiki Tennis-Commercial Complex will provide sufficient spaces to accommodate the number of cars without depending on curb parking. Approximately 300 parking spaces will be provided, more than are required by the Comprehensive Zoning Code.¹

Since the tennis facilities, in all probability, will be leased to a hotel

¹ More spaces are being provided because otherwise less than a full parking floor would have had to be built. Also, the evening traffic patterns currently in practice can make full use of the surplus parking spaces.

operator, most of the players will be tourists from the hotels in Waikiki. These tourists and visitors own or drive very few automobiles and there is no necessity for these players to drive to the proposed tennis complex. The number of parking spaces provided, therefore, should be valid for the future, taking into consideration the use of the facilities by hotel guests, the energy crisis, the trend towards fewer and smaller cars and the increased availability, improvement and use of public transportation.

Public Transportation. The major problems of noise, air pollution, land use, traffic congestion and safety are caused by the automobile. Consequently, changes in the mode of travel and planning for less reliance on the automobile are essential for improving the environment of the Waikiki District. Fortunately, adequate public transportation service is available in the District. Average headway is approximately 10 minutes during the peak hours and 15 minutes during the off-peak hours. As previously stated, there is now increasing dependence on the use of public transportation. The energy crisis and the consequent enforced use of public transportation and other modes of travel should bring about considerable relief to the present and future traffic problems.

Special Concerns. During the consultation period, several comments were raised on potential traffic related problems. These comments and the disposition to these comments (provided by the traffic consultant are provided below).

1. Evaluation of the ingress and egress locations and consideration to any access planned for Kuhio Avenue. (Comment from Department of Transportation Services, City and County of Honolulu.)

Disposition: The layout and the number of exits and entrances will affect the capacities of the abutting streets and the usual procedure is to determine the peak traffic volume to be assigned to each exit and entrance. However, in this instance, since the facilities are designed

to accommodate the tourists, most of whom will walk from the hotels in Waikiki, there will not be any distinct peak traffic flow or volume using the parking facilities. The traffic flow in and out of the parking garage will be relatively constant throughout the day, with a slightly higher peak during the daytime between the peak commuting hours of a highway or during the evening hours. The traffic generated by the parking facilities, therefore, will cause only a mild traffic impact on the abutting street during the peak commuting hours.

The 300 parking stalls will generate approximately 1,500 trips per day for the 12 hour period from 9:00 a.m. to 9:00 p.m., assuming parking turnover to average approximately 5. If the peak hour is 10 per cent of the daily volume of 1,500 trips, the number of trips generated would total only 150. Thus, only one combination exit and entrance need be provided for the 300 parking stalls.

So as to achieve the highest level of safety and to prevent any significant congestion on the main arterial (Kuhio Avenue), the combination exit and entrance will be located on Seaside Avenue approximately 170 feet from the Kuhio Avenue intersection. This location is more suitable than one on Kuhio Avenue, since access to a parking lot from a major highway always contributes to congestion as well as traffic accidents. This is because motorists entering the lots must slow down, causing traffic on the major highway to also slow down. If the parking spaces are all occupied, other motorists waiting to enter the parking garage will use one lane of the major highway as a storage lane, thus eliminating or curtailing one lane of the major highway for the movement of traffic.

2. "Changes in the flow of traffic over Kuhio and Seaside Avenues may result

as construction materials and heavy equipment are transported to the development site. The impact of traffic and circulation during the construction period (the extent of which might be indicated) ought to be detailed in the document." (Comment from Department of General Planning, City and County of Honolulu.)

Disposition: Under the regulations of the Waikiki Special Design District, open space for the project amounts to 50 per cent at the ground level. The construction of the proposed project, therefore, will present less of a problem than the construction of other hotels and apartments on Kuhio Avenue prior to the establishment of the Waikiki Special Design District. Since the construction of these hotels and apartments with a higher height limit and less open space did not result in changes in the traffic flow over Kuhio Avenue and the side streets, the traffic flow over Kuhio and Seaside Avenues will not be affected. Furthermore, the delivery of construction materials and the transport of heavy equipment are not movements that occur daily. Once the heavy equipment are transported, the equipment will remain at the site until they are no longer needed. With a large open space for the storage of materials and heavy equipment, the impact of traffic and circulation on Kuhio Avenue during the construction period will be minimal and it will be possible to protect the public and highway user and to move the maximum volume of traffic through the construction site with safety and minimum inconvenience, nuisance and delay.

G. Impact on Support Services and Facilities

The proposed project will generally increase the demand for public and private support services and facilities. Because the demand for such services (e.g. gas, electricity) will vary according to the tenants in the commercial and office area, the analysis below does not specify the amount of energy or

services to be required. Additionally, this section is brief because utilities were previously mentioned (see pages I-5 and I-7).

Drainage is adequate in the area. Catch basins to accommodate on-site drainage will be provided. It is acknowledged that the project site is within the flood zone of the Ala Wai Canal, but the historical effects have been minimal in impact.

Private utilities such as gas, telephone, and electricity will adequately serve the project. The retained project consultants have met with the appropriate officials of each utility and have determined that the building's needs can be accommodated by hooking-up to existing lines located within the property site or to lines at Seaside or Kuhio Avenue.

The water demand will approximately equal the present demand of the existing residential and commercial usage. The water line connection will be to a 12" existing line along Seaside, or to a 16" existing line along Kuhio.

Plans for the sewer system have been approved. (See Appendix B). The Department of Public Works, City and County of Honolulu, has indicated that the sewer facility can adequately serve the proposed development.

Solid waste collection and disposal will be provided by a private refuse company.

Fire Protection Services. The Fire Department has commented (page X-5) that fire protection services in Waikiki are adequate and are served from the Waikiki, Pawa, and McCully Fire Stations with supportive services from the Kaimuki, Makiki, Kakaako, and Palolo Fire Stations. Additionally, the plans will meet the existing building and fire codes.

Police Services. The Police Department has indicated (page X-12) that during construction and upon completion of the project, an increase in called-for

services is expected. They state that: "Present police services provided for that area should be adequate to handle the expectant increase." The Police Department also stated concern regarding noise and traffic congestion complaints. As addressed previously, both these areas of neighborhood complaints are possible. However, noise abatement measures have been addressed. Traffic congestion is usually caused by accidents or road work activity, both of which will be controlled by hours of operation and scheduling of material deliveries.

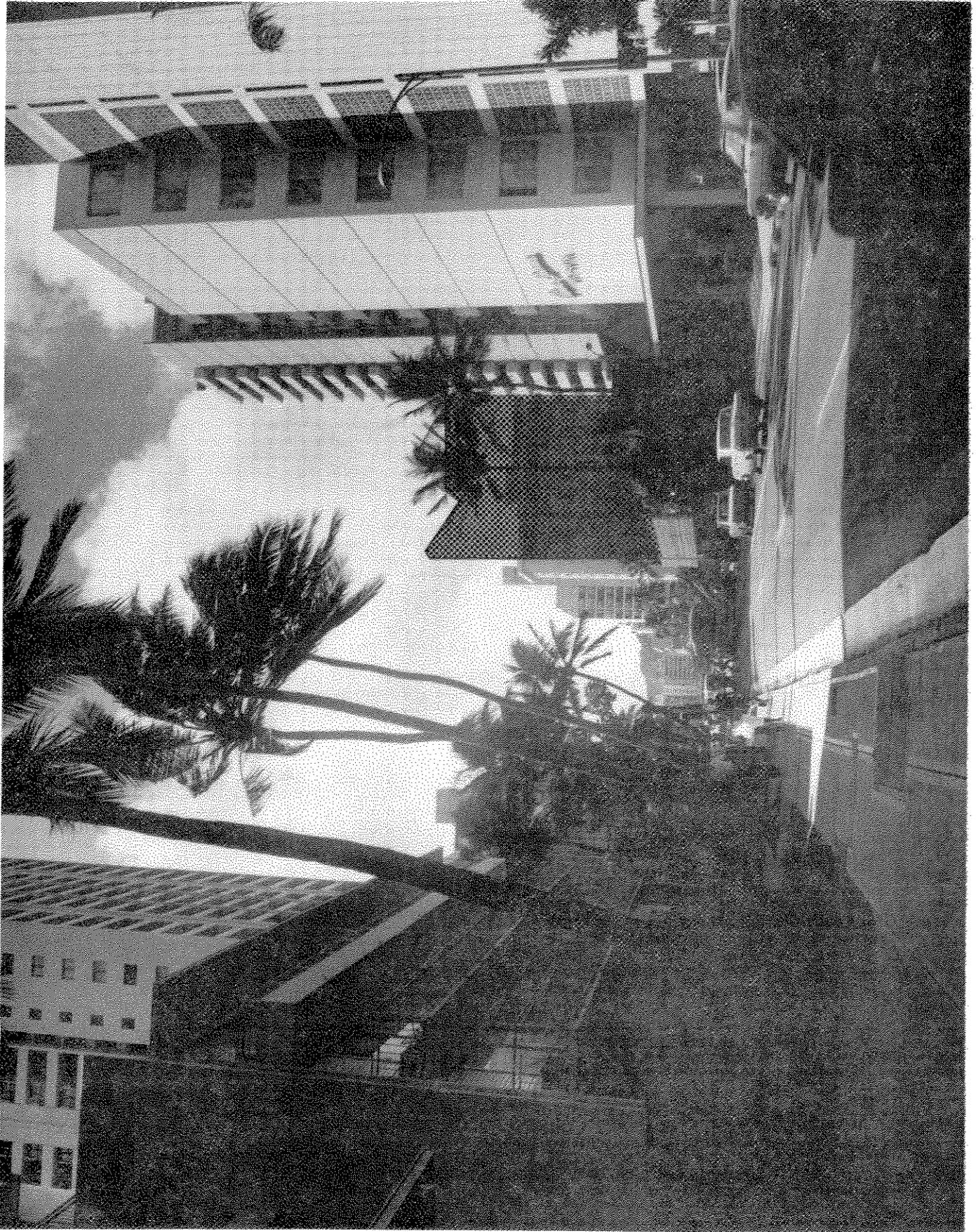
Emergency Medical Services. The location of the project places it within easy access and relatively short distances from several major hospitals in the city. These include: Kaiser Hospital, Kapiolani Hospital, and Queen's Hospital. Other private and public ambulance services are located throughout the city and in the Waikiki area to respond to emergency health care.

H. Impact on Scenic Views and View Planes

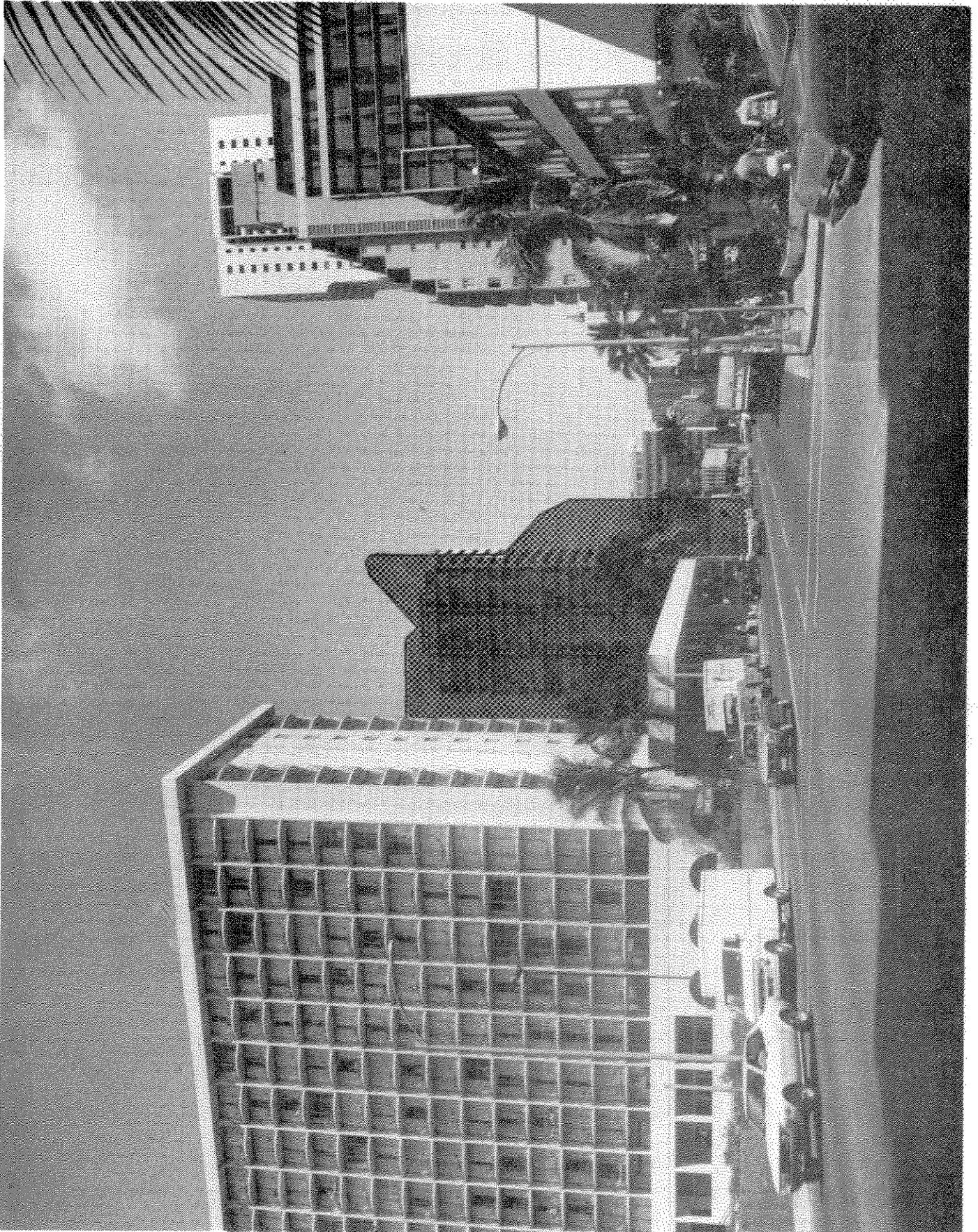
The impact on the scenic view and view planes is difficult to evaluate because of the subjective nature of this aspect. Individual perception, values, and judgments will differ and, therefore, no "absolute" positive or negative benefits can be determined in this area. Instead, Photographs 3 and 4 are provided to the reviewer (the proposed Waikiki Tennis-Commercial Building is superimposed) so that visual assistance can be rendered to evaluate this impact.

Photograph 3 provides the view from the pedestrian level on Kuhio Avenue in the Diamond Head direction. Presently, almost all of Diamond Head is obscured from the pedestrians' view from this position. The view is one of the many high-rise buildings (primarily hotels) in that direction (predominantly the Coral Reef).

Photograph 4 provides the view from the pedestrian level again on Kuhio Avenue



Photograph 3. Visual mass of the project building looking east on Kuhio Avenue.



Photograph 4. Visual mass of the project building looking west on Kuhio Avenue.

looking at the site in an Ewa direction. Here again, the view is one of high-rise buildings (which are located on Seaside Avenue or front Kalakaua Avenue).

Other view corridors can be assessed as follows:

Mauka view: The Waikiki Theatre Complex (1 & 2) and the adjacent parking structure obscure the mauka view from hotel rooms makai of the Theatre below Kalakaua Avenue. The hotel rooms on the upper floors of hotels in a direct mauka-makai line of the project would have a view over this project.

Evaluation: Because the building will be 170.0' high, the mauka view (which consists of condominiums along the Ala Wai Canal and the lower University area against the backdrop of the mountains and ridges forming Manoa Valley) will not be severely altered. Presently very little of this view is noticeable (except from high floors of about two hotels and the top deck of the Theatre's parking garage) and the view is obscured by the Waikiki Theatre Complex and parking garage.

Makai view: The makai view from the hotels directly mauka of the site are presently that of high-rise buildings primarily along Kalakaua Avenue and along Waikiki Beach. It is anticipated that with the construction and completion of the building the view will be altered so that the proposed building will become more prominent; other than that, the essential view of Waikiki high-rises will remain.

The views from the Coral Reef Hotel and Marine Surf Hotel (specifically the lanais of rooms facing the project site) will be altered. Rather than looking down on the present low profile of the commercial/residential areas, the view will now be one of looking onto a high-rise building.

In general, it is felt that the views and view planes will not significantly be altered, because the site is obscured by the adjacent high-rise hotels and buildings which will remain higher than 170', the height of the proposed building. The present roadway, pedestrian and hotel lanai views consists of high-rise structures in Waikiki and thus, this project would do little but add to this high-rise view. There will be a loss of the low profile configuration of the existing site; however, landscaping and building design will create a visual atmosphere which will enhance the sides of the building and the perimeter of the property.

I. Historical and Archaeological Considerations

There are no known sites of historical and/or archaeological interests within the project property. Additionally, there are no known sites or structures adjacent to the site.

J. Natural Hazards

The site is not located within the established tsunami zone; nor is there historical knowledge of severe tsunamis affecting the Waikiki area.

The site is not within an earthquake hazard area. Past knowledge of this area indicates that Waikiki has been affected by earthquakes to the extent Oahu is affected by seismic activity normally originating from the Island of Hawaii or its vicinity. Such earthquakes are infrequent and are not severely felt; and in many cases are barely noticeable by many visitors.

The project property is within the 100-year flood area of Ala Wai Canal (as pointed out by the U.S. Corps of Engineers). However, the location of the

property (approximately 700+ feet) makai from the canal would significantly lessen the impact of this 100-year flood event. In any case, the building plans must be approved by the Department of Public Works and Department of Land Utilization, as it relates to flood hazard districts.

The Corps of Engineers also provided (August 22, 1977) the following flood hazard information during the EIS review period:

"To supplement our previous comments (letter dated 27 June 1977), the flood insurance study which will determine the 100-year flood elevation in the project area is tentatively scheduled to be completed in Fiscal Year 1978. However, preliminary information is currently available and the floor elevation (7.5 feet, mean sea level datum) of the first floor of the planned building is approximately equal to the 100-year flood elevation."

IV. THE RELATIONSHIP OF THE PROPOSED ACTION TO LAND USE
PLANS, POLICIES, AND CONTROLS FOR THE AFFECTED AREA

"Discussion of how the proposed action may conform or conflict with objectives and specific terms of approved or proposed land use plans, policies, and controls, if any, for the area affected shall be included. Where a conflict or inconsistency exists, the Statement shall describe the extent to which the agency or applicant has reconciled its proposed action with the plan, policy, or control, and the reasons why the agency or applicant has decided to proceed, notwithstanding the absence of full reconciliation."

Environmental Impact Statement Regulations, Environmental Quality Commission, State of Hawaii. Sub-Part E., 1:42 Content Requirements, d.

The proposed project is generally consistent with the applicable and established goals and policies of the State and County.

State Land Use. The State land use designation for the project site is urban. The present and proposed use is consistent with an urban land use designation.

Development Plan for the Waikiki-Diamond Head Area, City and County of Honolulu. During the EIS review period, the Department of General Planning, City and County of Honolulu, provided the following information regarding the Development Plan:

"Under the Development Plan (DP) for the Waikiki-Diamond Head (Section "A") area adopted by Ordinance No. 3167, the proposed tennis complex and commercial building is within an area designated for Off-Street Parking use. However, under the Comprehensive Zoning Code of the City and County of Honolulu, the properties programmed for the proposed development are zoned Resort Commercial, which allows commercial recreation facilities."

General Plan - City and County of Honolulu, Statement of Objectives and Policies. In January, 1977, the City Council adopted the General Plan - Statement of Objectives and Policies. This section of the new General Plan establishes a guide for the County's growth and direction of development, and takes into consideration such topics as population, economic activity, the natural environment, housing, transportation and utilities, physical development and urban design, public safety, health and education; and culture and recreation.

Evaluation of these objectives and policies identified one section (under Economic Activity, Objective B. To Maintain the Viability of Oahu's Resort Industry) which is applicable to this project. These policies are discussed below.

"Policy 1.

Provide for the orderly growth of the resort industry by designating appropriate areas of the Island for resort use, including but not limited to Waikiki, Queen's Beach, West Beach, Kulima, and Makaha."

This policy is indirectly applicable to the project in that the commercial/ tennis uses are supported by the Waikiki resort development. The "orderly growth" of the Waikiki resort is consistent with Policy 1.

"Policy 2.

Encourage the resort industry to provide a high level of services to visitors."

The project will provide commercial and tennis facilities to visitors. The tennis facilities will provide championship courts for visitors' use. Such

a first-class facility is unavailable in the Waikiki area. Thus the commercial and tennis facilities will provide a "high level of service to visitors".

"Policy 3.

Preserve the well-known and widely publicized beauty of Oahu."

Not applicable on island-wide basis, but in terms of specific site improvements, the finished structure will enhance a situation considered in a deteriorating state.

"Policy 4.

Provide public, and encourage private, improvements to facilities in Waikiki."

The project is felt to be consistent with this policy inasmuch as this project can be considered a private improvement to visitor facilities (recreational) in Waikiki.

"Policy 5.

Discourage further high-density development in Waikiki."

The project is a high-density development and is inconsistent with this Policy.

The General Plan designates the site for commercial use. The project is consistent with the General Plan.

The Waikiki Special Design District (WSDD) - County Ordinance No. 4573.

The Waikiki Special Design District (WSDD) was established by Ordinance No. 4573 in March, 1976. The WSDD sets forth requirements relating to land uses, design controls, a circulation plan, urban design guidelines, and height, setback, and density regulations. (See Appendix A, WSDD maps.)

The project is consistent with the WSDD use precinct designation (also the zoning) -- Resort Commercial Precinct. The plans also reflects the setback,

height, and other quantitative design controls.

The developer must obtain a Development Conformance Certificate indicating conformance with the design guidelines and setbacks established in Ordinance 4573.

The project is not located within the Special Management Area (SMA) as established by Ordinance 4529.

Environmental Protection Policies, The environmental protection, Chapters of the Hawaii Revised Statutes (Chapters 341, 342, 343, and 344) were reviewed. Chapter 341, HRS, establishes the Office of Environmental Quality Control, the Governor's Environmental Council, and the University of Hawaii's Environmental Center. This Chapter is not applicable to the project.

Chapter 342 gives the Director of the Department of Health the authority to establish state rules and regulations regarding air pollution, water pollution, noise pollution, solid waste pollution, and other forms of pollution. The rules and regulations established by Chapter 342 must be complied with.

Chapter 343 establishes the Environmental Quality Commission and requires environmental impact statement (EIS). In regards to the Waikiki District, Chapter 343 states that an EIS shall be required for;

"All actions proposing any use within the Waikiki-Diamond Head area of Oahu, the boundaries of which are delineated on the development plan for the Kalia, Waikiki, and Diamond Head areas (map designated as portion of 1967 city and county of Honolulu General Plan Development Plan Waikiki-Diamond Head [Section A], which will probably have significant environmental effects."

The preparation of this EIS is in compliance with the EIS requirement.

Chapter 344, HRS, establishes State environmental policies. A review of these policies revealed that they are not applicable to these specific policies.

V. ALTERNATIVES TO THE PROPOSED ACTION

"Any known alternatives for the action which could feasibly attain the objectives of the action - even though more costly - shall be described and explained as to why they were rejected.

For agency actions, this discussion must include where relevant, those alternatives not within the existing authority of the agency.

A rigorous exploration and objective evaluation of the environmental impacts of all reasonable alternative actions, particularly those that might enhance environmental quality or avoid or reduce some or all of the adverse environmental benefits, costs, and risks shall be included in the agency review process in order not to prematurely foreclose options which might enhance environmental quality or have less detrimental effects. Examples of such alternatives include: the alternative of no action or of postponing action pending further study; alternatives requiring actions of a significantly different nature which would provide similar benefits with different environmental impacts; alternatives related to different designs or details of the proposed action which would present different environmental impacts; alternative measures to provide for compensation of fish and wildlife losses, including the acquisition of

A. Site Alternatiives

The developer has not considered an alternative site(s) for the proposed project. However, in preparation of this Environmental Impact Statement, an examination of the available sites in the adjacent area was made. It was found that there are no privately owned, vacant parcels of land (equivalent or larger in size) of this project site in the area bounded by Ala Wai Canal, Waikiki Beach, Lewers Street and Kaiulani Avenue. Those sites outside this area were felt to be too distant for the visitor market segment who would be in walking distance of the site.

Several parcels could be consolidated and made available for this type of development; however, these parcels are less central in location and would duplicate the dislocation of residents or businesses.

The developer found this project property to be developable and to have advantages in regards to its location, size, and accessibility to the recreation and commercial market segments anticipated as their clients.

B. Hotel Use

The primary reasoning for not attempting to build a hotel in the area is the Resort Commercial Zoning. Such a use would need zoning approval and based on the goals of limiting growth in Waikiki (based on the number of hotel rooms), would come under critical scrutiny of State and County agencies. Additionally, the size of the project property (and the need for appropriate setbacks) would limit the capacity and size of such a hotel. Such a hotel use would also need to maximize the number of hotel rooms, thus would likely attain the 280 foot height limit set forth for this precinct (Ordinance No. 4573).

Other reasons for not planning a hotel in this area include: (1) greater water and sewage needs for the hotel; (2) The Waikiki hotel inventory (existing and proposed units) already equals that recommended for 1980 by the Waikiki

Improvement Association; (3) there are already several hotels adjacent to the project site.

C. Use Alternative

Alternative use of the project site was also evaluated in the event that twelve tennis courts as proposed were not found viable economically. This alternative would involve the change of building use to: (1) rooftop tennis of 4 courts, (2) 58,000 square feet of retail commercial space, (3) 105,000 square feet of office space, and (4) parking for 486 vehicles. (The parking would be commensurate with the increase of office or commercial space).

The resulting impacts from such a tenant mix would be:

1. Impact on the Physical Geography: Same as discussed in Section III.A.
2. Impact on the Flora and Fauna: Same as discussed in Section III.B.
3. Impact on Air Quality: Slightly more adverse, with the additional cars adding to the traffic along Seaside and Kuhio Avenues and within the parking floors. The State of Hawaii eight-hour maximum carbon monoxide concentrations will be exceeded in both the proposed plans and the higher density tenant mix alternatives at two receptor sites (it should be noted that even without the project the State 8-hour maximum CO concentrations standards would be exceeded).
4. Impact on Noise: Essentially the same impact will occur. The noise abatements would still be applicable.
5. Impact on Socioeconomic: (See Appendix C). The impacts would remain the same except that (1) it is questionable whether a smaller (4 court roof facility) would be economically viable since the same support facilities would be needed for four or eight courts; (2) if the number of courts is reduced to 4, the probable impact on competing private facilities in Waikiki would be negligible; and (3) there may be some

difficulty in renting the office space unless it offers particularly attractive features, such as proximity to other activities and availability in large blocks.

6. Impact on Transportation: Essentially the same impact; except that the number of cars moving in and out of the entrance of the building will increase to 228 trips (rather than 150) during peak hour. The traffic consultant, Henry T. Au, has determined that the increase in the number of trips can be accommodated by Seaside Avenue and the existing street system. Also, one entrance will be sufficient for the increased number of vehicles.
7. Impact on Support Services and Facilities: Essentially the same impact as described.
8. Impact on Scenic Views and View Plane: Same as discussed in Section III.H.
9. Historical and Archaeological Considerations: Same.
10. Natural Hazards: Same.

It can be concluded that if the tenant mix is altered by deleting two floors of tennis and increasing the office space and parking levels, there would be essentially the same impacts as the proposed building and tenant mix.

D. No Action

No action would mean that the proposed project would not be implemented and the existing uses, trees, and structures would remain on the project site. It would be likely, however, that within several years, other developers will pursue the development of this parcel for the very reasons (e.g. accessibility, zoning) cited in this report. Eventually, such a high-rise use would be foreseen due to such development pressures.

VI. THE RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S
ENVIRONMENT AND THE MAINTENANCE AND
ENHANCEMENT OF LONG-TERM PRODUCTIVITY

"A brief discussion of the extent to which the proposed action involves trade-offs between short-term environmental gains at the expense of long-term losses, or vice versa, and a discussion of the extent to which the proposed action forecloses future options, narrows the range of beneficial uses of the environment, or poses long-term risks to health or safety shall be included. In this context, short-term and long-term do not necessarily refer to any fixed time periods, but should be viewed in terms of the environmentally significant consequences of the proposed action."

Environmental Impact Statement Regulations, Environmental Quality Commission, State of Hawaii. Sub-Part E., 1:42 Content Requirements, h.

As more fully described in Section III, Probable Environmental Impacts of the Proposed Project, several short-term losses to the physical and socioeconomic environment will occur. Losses relating to the physical environment include the removal of various trees and plants presently on the site, and the dislocation of avifauna during the construction period. Of greater importance is the socioeconomic losses. These include the dissolution of two businesses*located in permanent structures on the site; a total of 12 jobs will be lost due to the closing of these businesses. Four other businesses (two located in non-permanent and transient type structures, (a rental car business, and a car storage area) will also be dislocated. There will be a displacement of approximately 38 residents in the 25 apartment units presently being rented out in the four-story Seaside Surf Hotel on the project site.

In relationship to these short-term losses, the long-term benefits (or productivity) of the proposed project includes: a net increase of businesses within the project site, a net increase in the total number of jobs to be provided, and increased revenues to the State and City in form of taxes. The proposed project will be consistent with the present zoning, existing surroundings and proposed uses of the area, and will provide for additional tennis facilities which will add to the overall recreational facilities in the Waikiki District.

A total of 58,000 square feet of commercial space is planned for the proposed building. Additionally, 34,620 square feet of space for offices is planned. It is estimated that 300 full-time and 60 part-time jobs will be generated by the commercial area. (This excludes the employees in the office area.)

Sales made at the shopping center will increase revenue for the State (based on visitors' expenditures), as well as revenue based on the multiplier effect (normally ranging from 1:1 to 1:1.5) from employee wages. Revenue directly to the State will also include taxes from sales (4%), and payroll taxes (from

* These two businesses will not likely relocate elsewhere.

employees). Property tax will also increase, generating additional income to the City.

In addition to these economic benefits, it is felt that the proposed project is consistent with the urban land use and Resort-Commercial Precinct designations established for the site. The proposed plan for the building is consistent with the adjacent high-rise structures. The proposed building is not expected to infringe upon or be inconsistent with the present land uses and character generally found in the adjacent area.

The tennis courts (12) and facilities planned for the proposed building will provide private recreational facilities for the Waikiki area. Presently the Waikiki District lacks sufficient public and private recreational facilities. In many cases, visitors and residents compete for the existing recreational facilities in Waikiki. It is felt that the tennis courts proposed will allow visitors the opportunity to play tennis during their stay in Waikiki. With the availability of private tennis courts, the more affluent visitors and residents are likely to utilize this facility rather than patronize the more crowded public tennis courts.

At this time, no long-term risks to health or safety is expected. The proposed project will result in increases in traffic, air pollutants, and pedestrian activity; however, it is felt that such increases are not the basis of risks to health or safety.

The use of the project site for the Waikiki Tennis-Commercial Building will foreclose future land options. It is rare to downgrade the use of private property once the infrastructures and structures are established. (The investment in these improvements will result in increased property value, and therefore, the withdrawing of land from a high density urban use has limited economic appeal.) Therefore, realistically, the land is committed to this resort-commercial high-rise use, or in the long-term future an equal or higher use.

VII. MITIGATION MEASURES PROPOSED TO MINIMIZE IMPACT

"Description of any mitigation measures included in the action plan to reduce significant, unavoidable, adverse impacts to insignificant levels, and the basis for considering these levels acceptable shall be included. Where a particular mitigation measure has been chosen from among several alternatives, the measures should be discussed and reasons should be given for the choice made."

Environmental Impact Statement Regulations, Environmental Quality Commission, State of Hawaii. Sub-Part E., 1:42 Content Requirements, i.

Mitigation measures to reduce noise, fugitive dust, and traffic congestion are discussed in Section III., Probable Environmental Impacts of the Proposed Project. In addition to these specific measures, during construction a number of conventional methods are available and will be employed by the contractor to alleviate short-term adverse effects. Specifically, these methods would serve to mitigate erosion problems, fugitive dust, noise, siltation, and solid waste.

The following statutes, regulations, and legal requirements must be complied with:

- a. Grading permit pursuant to Ordinance 3968, City and County of Honolulu.
- b. Applicable building, fire, plumbing and electrical codes pursuant to the adopted uniform codes and regulations, Building Department, City and County of Honolulu.
- c. Public Health Regulations, Chapter 37, Water Pollution Control, State Department of Health.
- d. Public Health Regulations, Chapter 37-A, Water Quality Standards, State Department of Health.
- e. Public Health Regulations, Chapter 42, Ambient Air Quality Standards, State Department of Health.
- f. Public Health Regulations, Chapter 43, Air Pollution Control, State Department of Health.
- g. Public Health Regulations, Chapter 44-A, Noise Control for Oahu, State Department of Health.
- h. Public Health Regulations, Chapter 44-B, Community Noise Standards for Oahu, State Department of Health.

VIII. ANY IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES
(THAT WOULD BE INVOLVED IN THE PROPOSED ACTION
SHOULD IT BE IMPLEMENTED)

"Identification of unavoidable impacts and the extent to which the action makes use of non-renewable resources during the phases of the action, or irreversibly curtails the range of potential uses of the environmental shall also be included. The possibility of environmental accidents resulting from any phase of the action should also be considered. Agencies should avoid construing the term "resources" to mean only the labor and materials devoted to an action. "Resources" also means the natural and cultural resources committed to loss or destruction by the action."

Environmental Impact Statement Regulations, Environmental Quality Commission, State of Hawaii. Sub-Part E., 1:42 Content Requirements, j.

It is anticipated that the construction of the proposed building will commit the necessary construction materials and human resources (in the form of planning, designing, engineering, construction labor, landscaping, and personnel for the sales, management, services, offices, and maintenance functions). Some of the construction material could be reused if and when the complex is demolished; however, at the present time and state of our economy, it is felt that the reuse of much of these resources would be limited. The human resources expended for this project also will not be retrievable. The primary human resource, labor, will be compensated during the various stages of the project by the developer, shop keepers, and operators of the tennis facility.

In addition to construction material and labor resources, the services and merchandise sold in the building can also be considered resources which will be utilized or consumed by the purchasers or others.

The existing "resources" on the site which will be lost due to the proposed project include: (1) the loss of several trees and various cultivated plants within the project site; (2) the loss of the low-rise visual profile of the present building and businesses on the site; and (3) the demolition of the existing two concrete tile structures and wooden structures on the site.

The loss of these trees and buildings are unavoidable. The concrete structures appear to be sound, and are probably 30+ years old. These are being utilized as a residential/commercial structure and a commercial structure and are both occupied. The wooden structures include a vacant and apparently deteriorated residential structure, and open wooden carports in which the car rental firm utilizes as a garage/storage area. The demolition of these structures is not expected to result in a loss of significant resources, since the building

material and architectural design are not considered to be a cultural or historical resource. The loss of a few coconut trees are considered adverse, primarily because these trees are mature and stand over 25 feet high. The clearing of these trees will be irreversible; replanting of the trees would be uneconomical and would involve several problems considering their size, transportation, and removal/preservation difficulties. As mentioned earlier, approximately 35 coconut trees (along the perimeter of the site) will be retained. The Landscaping Plan also calls for large trees to be planted along the entire walkway to provide an almost continuous canopy along Seaside Avenue, Kuhio Avenue and Duke's Lane.

The loss of the present low-profile is also unavoidable and as stated in Section III, the proposed building will blend into the high-rise character or the surrounding buildings (located makai, Diamond Head, and Ewa of the property). There should be no adverse visual impact on Diamond Head (the most prominent natural landmark seen from the Waikiki District) from existing views along public thoroughfares and facilities. Views from the immediate adjacent hotel rooms (to the 15th floor or 200 feet) will be altered. However, considering that their present views are already of other high-rise hotels and buildings, it is not felt that this building will cause significant negative reaction to the occupants of those hotel rooms whose views are affected.¹

There is always a possibility of environmental "accidents" occurring due to individual negligence. For the most part, it is felt that compliance with grading, construction, and building ordinances, standards, and codes will minimize such accidents. Additionally, the plans drawn must be signed by several State and County agencies which verify the compliance of the plans to the State and City standards and codes.

¹ This is largely subjective, and differs based on personal involvement and values, judgments, perception, and priorities.

IX. AN INDICATION OF WHAT OTHER INTERESTS AND CONSIDERATIONS OF
GOVERNMENTAL POLICIES ARE THOUGHT TO OFFSET THE
ADVERSE ENVIRONMENTAL EFFECTS OF THE PROPOSED ACTION

"The Statement must also indicate the extent to which these stated countervailing benefits could be realized by following reasonable alternatives to the proposed action that would avoid some or all of the adverse environmental effects. In this connection, agencies or applicants that prepare cost-benefit analyses of proposed actions shall attach such analyses, or summaries thereof, to the Statement, and should clearly indicate the extent to which environmental costs have not been reflected in such analyses."

Environmental Impact Statement Regulations, Environmental Quality Commission, State of Hawaii, Sub-Part E., 1:42 Content Requirements, k.

The height, setbacks, and use of the proposed building was determined largely by the use precincts and design control established by Ordinance 4573, Waikiki Special Design District (see Appendix A). The determination of parking spaces and loading zones were based on complying with the Comprehensive Zoning Code. To this extent it is felt that the compliance and mitigation measures within governmental policies were inherent in the initial project design.

Discussion on the relationship of the proposed building to governmental land use plans, policies, and controls is provided in Section IV.

X. ORGANIZATIONS AND PERSONS CONSULTED AND THE REPRODUCTION OF
COMMENTS AND RESPONSES MADE DURING THE CONSULTATION PERIOD

*"The identity of all governmental agencies, other organizations
and private individuals consulted in preparing the Statement,
and the identity of the persons, firms, or agency preparing the
Statement, by contract or other authorization, must be disclosed."*

*Environmental Impact Statement Regulations, Environmental
Quality Commission, State of Hawaii. Sub-Part E., 1:42
Content Requirements, l. & m.*

A. Organizations and Persons Contacted in the Development of Plans

The following government agencies, private organizations, and professional groups were contacted in the development of plans for the proposed Waikiki Tennis-Commercial Building.

Relating to the sewer connection:

Wallace Miyahira, Director and Chief Engineer, Department of Public Works, City and County of Honolulu

H. J. Young, Chief, Division of Engineering, Department of Public Works, City and County of Honolulu

Francis Aona, Chief, Division of Sewers, Department of Public Works, City and County of Honolulu

Kazu Hayashida, Director, Department of Transportation Services, City and County of Honolulu

Shinji Soneda, Deputy Chief, Environmental Protection and Health Services Division, State of Hawaii

Chuck Fong, GASCO, Inc.

Francis Leong, Hawaiian Telephone Co.

F. Karimoto, Hawaiian Telephone Co.

Request for design evaluation:

Bruce Duncan, Department of Land Utilization, City and County of Honolulu

Relating to tennis information:

Peter Burwash, International

King's Courts

Gil Sherman, Tennis Factory

B. Retained Consultants for the Proposed Waikiki Tennis-Commercial Building

Project

Architect: Boone & Associates, Inc.

Architect/Designer: Warner G. Boone

Structural Engineer: Richard M. Libbey, Inc.

Engineer: Richard M. Libbey

Mechanical/Electrical Engineer: Frederick H. Kohloss & Associates, Inc.
Mechanical Engineer: Fred Kohloss
Electrical Engineer: Richard Leung

Civil Engineer & Land Surveyors (Land Court Consolidation Map):

Wright Harvey & Wright
Engineer: Shinya Yoshinaga/Tadashi Nakahara

Civil Engineer (Topographic Map/Sewer Connection):

Sam O. Hirota, Inc.
Engineer: Kataichi Ninomiya

Landscape Architect: Fowler Berman & Associates, Inc.
Landscape Architect: Don Bergman

General Contractor: Swinerton & Walberg Co.
Chief Engineer: Rehman Scholz

Model Maker: Architectural Scale Models
Model Maker: Paul Hirata

Attorney (Land Consolidation): Carlsmith, Carlsmith, Wichman & Case
Attorney: John Lezak

Environmental Consultants:

Environmental Impact Statement: Environmental Communications, Inc.

Traffic Consultant: Henry T. Au, Consulting Engineer

Socioeconomic Consultant: Robert N. Anderson, Ph.D.

Air Pollution Consultant: Barry D. Root, M.A., M.P.H.

Noise Consultant: Ronald A. Darby and Associates

C. Agencies and Persons Consulted in the Preparation of the EIS

The governmental and private agencies identified on Table 20 were contacted (see letter to these agencies on page X-5), and were requested to review and provide comments on the EIS Determination Notice (a copy of the Notice is in Appendix D). A deadline date of June 27, 1977, for comments on the EIS Determination Notice was set.

A total of 16 agencies commented and responses to those agencies having comments are provided on the following pages.

Table 20. Agencies and Persons Consulted in the Preparation of the EIS

<u>Agency/Organization</u>	<u>Copy of EIS Determination Notice¹</u>	<u>Date Comment Received</u>	<u>Response From Boone & Associates²</u>	<u>Copy of Comment on Page</u>
<u>City and County of Honolulu</u>				
Fire Department	X	6/7/77	X	X-5
Department of Public Works	X	6/9/77	X	X-6
Department of General Planning	X	6/10/77	X	X-9
Police Department	X	6/13/77	X	X-12
Department of Parks and Recreation	X	6/16/77	X	X-13
Board of Water Supply	X	6/20/77	X	X-14
Department of Transportation Services	X	6/29/77	X	X-15
Department of Land Utilization Design Branch	X	--3	--3	--3
<u>State</u>				
Department of Health	X	6/20/77	X	X-17
Department of Planning and Economic Development	X	6/23/77	X	X-18
Department of Land and Natural Resources	X	6/27/77	X	X-19
Department of Education	X	--	--	--
Office of Environmental Quality Control	X	--	--	--

¹Sent May 24, 1977.

²Sent July 5, 1977.

³The Department of Land Utilization prepared the EIS Determination Notice, therefore, no response to the EIS Determination Notice was appropriate.

Table 20. (Con't.)

<u>Agency/Organization</u>	<u>Copy of EIS Determination Noticelet</u>	<u>Date Comment Received</u>	<u>Response From Boone & Associates²</u>	<u>Copy of Comment on Page</u>
<u>University of Hawaii</u>				
Environmental Center	X	6/9/77	X	X-19
Water Resources Research Center	X	6/14/77	X	X-20
Hawaii Environmental Simulation Control	X	--	--	--
<u>Federal</u>				
Corps of Engineers, Department of the Army	X	6/29/77	X	X-20
<u>Private Organizations</u>				
American Lung Association of Hawaii	X	6/9/77	X	X-21
Waikiki Improvement Association, Inc.	X	6/23/77	X	X-22
Waikiki Residents Association	X	6/24/77	X	X-28
Outdoor Circle	X	--	--	--
League of Women Voters	X	--	--	--
Life of the Land	X	--	--	--
Oahu Development Conference	X	--	--	--
Hawaii Hotel Association	X	--	--	--

¹Sent May 24, 1977.
²Sent July 5, 1977.

BOONE & ASSOCIATES
 ARCHITECTURE
 ENGINEERING
 & PLANNING
 505 WARD AVE
 HONOLULU
 HAWAII 96814
 PH 537-2571

Example of letter sent to request comments on the
 EIS Determination Notice.

24 May 1977

FRANK F. PASTOR
 WATOR



FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU

1455 S. Beretania Street, Room 305
 Honolulu, Hawaii 96814

S. K. AUL
 Chief

June 3, 1977

Gentlemen:

SUBJECT: Consultation Process Prior to Filing the EIS for the Proposed
 Waikiki Tennis-Commercial Building, Waikiki, City and County
 Of Honolulu

Enclosed is a copy of the Environmental Impact Statement Preparation
 Notice for the proposed Waikiki Tennis-Commercial Building. At this
 time we would like to request comments from your department/association
 on this initial environmental document. We recognize your interest and
 would appreciate comments on the Preparation Notice prior to June 27,
 1977.

We would like to note that the Preparation Notice erroneously identifies
 the Environmental Impact Statement Preparation Notice as being pursuant
 to Ordinance 4529 (Interim Shoreline Protection). However, we note that
 a determination to prepare an Environmental Impact Statement with the
 Department of Land Utilization as the approving agency is based on the
 project being located within the Waikiki Special Design District (Ordin-
 nance 4573).

Your comments on the Environmental Impact Statement Preparation Notice
 should be provided to Environmental Communications, Inc., P. O. Box 536,
 Honolulu, Hawaii 96809. Should you require further information, please
 contact Environmental Communications, Inc., at 521-8391. If we are not
 contacted or receive no comments prior to June 27, 1977, we will assume
 that your department/association does not have significant comments or
 foresees any conflicts with this project at this time. Upon completion
 of the consultation process and review of the comments received, we will
 proceed to prepare the Environmental Impact Statement.

We appreciate your review and look forward to any comments you may provide.

Very truly yours,

BOONE & ASSOCIATES, INC.

Warner G. Boone
 Warner G. Boone, A. I. A.
 President

Enclosure

cc: Department of Land Utilization S & M Partners
 Environmental Communications, Inc.

WARNER G. BOONE, ARCHITECT, ENGINEER & PLANNER, 5 WARD AVE., HONOLULU, HAWAII

Environmental Communications, Inc.
 P. O. Box 536
 Honolulu, Hawaii 96809

Gentlemen:

SUBJECT: Consultation Process Prior to Filing the EIS for the Proposed
 Waikiki Tennis-Commercial Building, Waikiki, City and County
 of Honolulu

We received a letter from Boone & Associates, Inc. regarding the above
 subject matter wherein they requested that we submit our comments directly
 to you.

We have no specific comments or objections regarding this project since
 fire protection services in the Waikiki area are adequate from the Waikiki,
 Pawa, and McCully Fire Stations with supportive services from the Keolu,
 Makiki, Kakaako, and Palolo Fire Stations.

We strongly recommend that all legal requirements are met as well as
 installation of fire safety programs upon completion of the complex.

Should you require further information, please contact Assistant Chief
 Stanley W. G. Tom at 955-8304.

Very truly yours,

Anthony J. Lopez
 ANTHONY J. LOPEZ

Acting Fire Chief

cc: Boone & Associates, Inc.
 Department of Land Utilization

BOONE & ASSOCIATES

ARCHITECTURE
ENGINEERING
& PLANNING
505 WARD AVE
HONOLULU
HAWAII 96814
PH. 537-2571

5 July 1977

Anthony J. Lopez
Acting Fire Chief
Fire Department
City & County of Honolulu
1455 South Beretania Street, Room 305
Honolulu, Hawaii 96814

Dear Chief Lopez:

Subject: Environmental Impact Statement Preparation Notice for the
Proposed Waikiki Tennis-Commercial Building

Thank you for your letter of June 3, 1977 regarding the above mentioned Environmental Impact Statement Preparation Notice. The information provided in your letter will be useful in determining the impact of the proposed project on the existing fire station. Please be assured that all of the legal requirements relating to the installation of fire prevention and equipment and fire safety programs will be provided upon completion of the project.

Your comment, as well as this response, will be incorporated into the Environmental Impact Statement presently being prepared. Upon completion of this Environmental Impact Statement, a copy will be sent to you for your further review and comment.

Very truly yours,

BOONE & ASSOCIATES, INC.

Warner G. Boone
Warner G. Boone, A.I.A.
President

cc: Department of Land Utilization
S & M Partners
Environmental Communications, Inc.

WARNER G. BOONE, AIA - WAYNE M. NAKATA & PAISY M. TAMURA, ASSOCIATES

DEPARTMENT OF PUBLIC WORKS
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813



FRANK P. FARI
DIRECTOR

WALLACE NIYAHIRA
DIRECTOR AND CHIEF ENGINEER

ENV 77-255

June 6, 1977

Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Gentlemen:

Subject: EIS Preparation Notice for the
Proposed Waikiki Tennis-Commercial
Building, Waikiki, Hawaii

We have reviewed the subject preparation notice and have the following comments.

1. According to the tax map key, the proposed site is located on the makai-Diamond Head corner of Kuhio and Seaside.
2. Drainage facility in the area is adequate; however, Seaside Avenue has many "holidays" where storm runoff collects and ponds. Interior drains from the development may connect to the existing drain manhole on the intersection of Seaside and Kuhio (same corner).
3. Sewer facility is adequate to serve the proposed development. However, we wish to point out that after July 1, 1977, the City may not be allowed to permit any new connections pursuant to the provisions of the National Pollutant Discharge Elimination System (NPDES) permit for the Sand Island Sewage Treatment plant.

Very truly yours,

Wallace Niyahira
WALLACE NIYAHIRA
Director and Chief Engineer

cc: Div. of Engineering (Drainage)
Div. of Sewers (Public Contact Section)

BOONE & ASSOCIATES
(INC.)

ARCHITECTURE
ENGINEERING
& PLANNING
505 WARD AVE
HONOLULU
HAWAII 96814
PH 537-2571

5 July 1977

Mr. Wallace Miyahira, Director
Department of Public Works
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Miyahira:

Subject: Environmental Impact Statement Preparation Notice for the
Proposed Waikiki Tennis-Commercial Building

We have received and reviewed your comments of June 6, 1977 on the above
identified EIS Preparation Notice. Your department's comments are addressed
below:

1. The EIS Preparation Notice was in error when describing the location of the site as being on the "mauka-Ewa corner of Kuhio Avenue and Seaside Avenue". As you pointed out, the site is on the makai-Diamond Head corner of Kuhio and Seaside. This will be corrected in the Environmental Impact Statement.
2. The project will include catch basins located at various locations. This should adequately serve the project's drainage needs.
3. Regarding the sewer system, we note that the hook-up is to an existing 8" lateral and then to an existing 12" sewer line on Seaside running towards Kuhio. At Kuhio, this line is connected (existing) to a 16" line running Diamond Head to Ewa. About 200' from the Ewa end of the property, a new by-pass has been installed connecting the 16" to 20" running parallel to it.

The plans for the sewer improvements have been approved (see attached) by the various appropriate State and County agencies.

Relating to the July 1, 1977 deadline which may not permit any new sewer connections pursuant to the provisions of NPDES permit for Sand Island SIP, we note that this situation is applicable to a majority of projects on the island. Recent statements and published articles (see attached article), indicate that the City will continue to issue permits for hookups after July 1, 1977.

(cont'd.)

Mr. Wallace Miyahira
5 July 1977
Page Two

Thank you for your comments. We will be incorporating your letter in the EIS. Upon submitting the EIS, we hope your department will again take the opportunity to review the document and provide comments.

Very truly yours,

BOONE & ASSOCIATES, INC.

Warner G. Boone
Warner G. Boone, A.I.A.
President

Attachments (2)

cc: Department of Land Utilization
S & M Partners
Environmental Communications, Inc.

BOONE & ASSOCIATES

G.C.A. Scoreboard

News and notes from the General Contractors Association of Hawaii / by ELOY CHUN

CONGRATULATIONS TO THE HAWAII CHAPTER, CONSTRUCTION SPECIFICATIONS INSTITUTE, ON GAINING THE CHAPTER TECHNICAL EXCELLENCE AWARD FOR ITS "CONTINUING PROGRAM OF CONSTRUCTION STANDARDS" FOR SET BY THE LOCAL INDUSTRY.
The award was presented at last week's USF national convention in Denver.

A JULY DEADLINE imposed under the Federal Water Pollution Control Act of 1972 that would prohibit pipes from being hooked onto sewer lines unless the latter has secondary treatment will not be enforced by the City & County Public Works Department.

A Sewers Division spokesman at a meeting with GCA representatives last week said the City notice handed to applicants for sewer connection permits indicated that the City, like some 67 per cent of the nation's municipalities, is unable to conform to the requirements of the law because Federal funding is either inadequate or to late for the required secondary facilities. Simply cannot be built by this time.

In fact, Congress itself recognizes the problem, and through the 1979, currently being debated in the US Senate, seeks to extend the deadline relating to required secondary treatment facilities to 1982 or 1983.

Delay in getting the program implemented was primarily due to postponement of funds appropriated by Congress in 1972 for the purpose. It is not enough to simply appropriate the money, but the construction industry is under constant adding fuel to the construction industry's problems, by the "change" conditions. Since these several programs have been offered, to further complicate the problem. And so far nothing has been done about staying the July 1 deadline.

The City has reassured applicants, however, that although it will continue to issue permits for hookups after July 1, the State or Federal government could - legally - restrict such activity. In such an event, the City will issue a legal challenge, the City spokesman said.

Workouts are not required in every area on the island. It depends on specific conditions and applications are made. Where hookups are necessary and applications are made, the City will seek from the EPA what is called an Enforcement Compliance Schedule (ECS). Some 12 community areas would be affected, including Kahala, Kaneohe, Nuuanui, Mililani, Pacific Palisades, Pearl City, Sand Island, Waianae, Waipahu, Wahiawa, Waiwai, and Waimanalo.

A fuller explanation of the issue along with an updated report will be presented at the July 12th dinner meeting of the highways and utilities contractors. The meeting is open to all interested parties, and reservations are to be made by calling Marie, 832-1081.

AFFLICTED STATE AGENCIES, led by the Office of Consumer Protection, will suggest a check-off form and approach to be used in seeking moonlighting and related unlicensed activity within the industry.

The proposed activity was the result of a morning-long discussion called last Tuesday by Rep. Dennis Yamada, chairman of the House Committee on Consumer Protection and Commerce.

More than 26 persons, representing various industry, labor and government agencies, attended. Also present were industry representatives from all Neighbor Islands.

Discussion centered on a House-adopted resolution passed in the last session that required the State Tax Department to determine if tax revenues are being lost by the practices of certain construction workers. Findings of the study with suggested remedial legislation are to be submitted to the 1978 legislature.

SOURCE: Pacific Builder's Report, June 27, 1977 issue.

STOMED INTO LAW are the following bills, pursued by the industry or of some direct impact on the industry:

HB 7 (Act 16): Establishes in the office of the legislative auditor a legislative economic advisory council to provide data appropriate to both the Senate Ways & Means Committee and the House Finance Committee.

HB 122 (Act 188): Comprehensively amends the Hawaii Coastal Zone Management Act of 1976 with setting of long-range goals, new definitions and effective dates governing implementation of public use.

HB 135 (Act 169): Continues for employment security purposes for calendar year 1978 the contribution rate for each employer of 3.5 per cent of wages paid by him during such calendar year.

HB 164 (Act 16): Adds to explicit that a contract for services by a person without a license which is required to be licensed by the Department of Regulatory Agencies shall be void. Prohibits such a person from recovering the contract price or reasonable value thereunder.

HB 374 (Act 48): Provides that in addition to the usual 30-day period, from mailing or delivery of notice, for filing an appeal from a determination or redetermination of unemployment insurance claims, the Department of Labor and Industrial Relations may for good cause extend the appeal period to 90 days.

HB 428 (Act 127): Amends law on Contractors Recovery Fund, substituting the word "reposed" for "agreed" in relation to persons who may recover from the fund. Increases the initial recovery fee assessment from \$50 to \$150, with renewal on a biennial basis. Fees to be paid thereafter only when fund is less than \$150,000.

HB 685 (Act 93): Increases the interest rate for late payments by the State or County to persons who tender goods or services under contract in some one-half to one per cent of the remaining unpaid principal. The paying agency is to be responsible for payment of such interest.

HB 1164 (Act 177): Requires when posting a performance bond the inclusion as part of the contract price endorsed retained to be required for extra work. Provides that when a contractor is required to end or re-terminate a contract under which the contractor is to be paid, the contractor cannot be accurately estimated at the time he is to be paid. It is to be avoided, the bond amount to be as designated in the bid documents. Deletes the cost of the work previously estimated by the State or County as a factor in setting the amount of the bond to be posted.

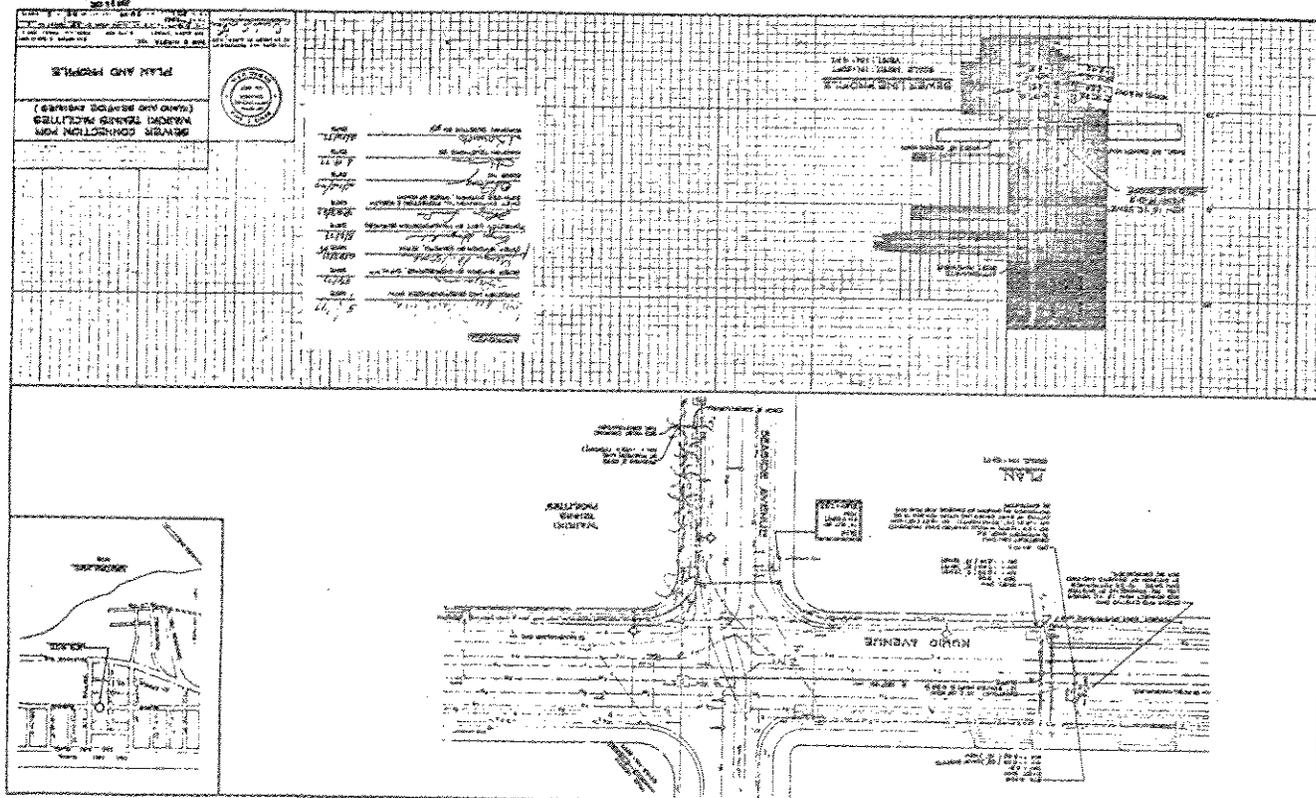
HB 1264 (Act 193): Amends provision relating to liens by providing that no lien attaches to common elements subsequent to substantial completion of the project and the redemption of the first conveyance or lease of an apartment in the project to a bona fide purchaser and thereafter, instead of subsequent to recording of the declaration, while the property remains the subject of a horizontal property regime, further provides that following such completion and first recordation, liens may arise or be created only against the several apartments and their respective common interests as follows:

(1) During such period, if the developer retains ownership of any apartment, but reserves legal title under an agreement of sale to a bona fide purchaser, and the apartment in respect of which a pending contract of sale has been entered into with a bona fide purchaser but which has not, at the time of filing of the application of a mechanic's lien, closed escrow, or (2) any other person retains ownership of any apartment prior to the first conveyance or lease of such apartment to a bona fide purchaser; mechanic's or materialman's liens may arise or be created for labor or material furnished in project construction, and such liens shall affect every apartment and its respective common interests so retained until the end of the period for making application for such liens has expired without any such application having been filed.

Next week we will deal with Senate bills that have been enacted.

TRANSPORTATION SECRETARY BROCK ADAMS has taken a less rigid stance than his predecessor in regard to no-strike agreements for major DOT-financed contracts, preferring decisions on a case-by-case basis.

Adams informed the Council of Construction Employers that he wanted to avoid placing "the government in an exposed role in labor negotiations" but that he was not "prepared to forsake the option that negotiating such an agreement may, on occasion, appear to provide the best avenue to achieving DOT's objectives in expediting a particular program.



DEPARTMENT OF GENERAL PLANNING
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET
HONOLULU, HAWAII 96813



FRANK F. FASI
MAJOR

ROBERT R. WAY
CHIEF PLANNING OFFICER

DGP5/77-1401 (JB)

June 9, 1977

Mr. F. J. Rodriguez, President
Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

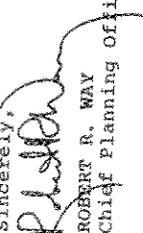
Dear Mr. Rodriguez:

Proposed Waikiki Tennis-Commercial Building
EIS Preparation Notice

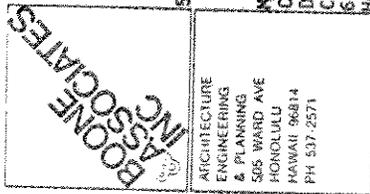
With regard to the above-captioned, we offer the following comments:

1. A comprehensive discussion on the need for the proposed development appears appropriate for inclusion in the environmental impact statement (EIS).
2. Consideration should be given toward addressing and describing the impact of displacing some forty-two (42) apartment dwelling units, i.e., the effect this might have on the community's housing inventory and upon the residents being displaced.
3. Departmental records show that Easement "A", comprising some 1,939 square feet of land and designated for sewer purposes, is situated within the proposed development site. This should be mentioned in the EIS.
4. Changes in the flow of traffic over Kuhio and Seaside Avenues may result as construction materials and heavy equipment are transported to the development site. The impact of traffic and circulation during the construction period (the extent of which might be indicated) ought to be detailed in the document.

Sincerely,


ROBERT R. WAY
Chief Planning Officer

RRW:fmt



5 July 1977

Mr. Robert R. Way
Chief Planning Officer
Department of General Planning
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Way:

Subject: Environmental Impact Statement Preparation Notice for the Proposed Waikiki Tennis-Commercial Building

Thank you for your letter of June 9, 1977 on the above mentioned EIS Preparation Notice. We have addressed each of your four comments below:

1. No response necessary.
2. A Socioeconomic Impact Study has been prepared for the proposed project. This study includes residential impact as well as the effect on commercial, tennis facilities, the relocation of present commercial tenants, the accompanying increased competition for certain commercial activities in the Waikiki District, the impacts of the office facilities, and the impacts of jobs created by the project. For your information we have attached the study's findings on residential impact.
3. The information on Easement "A" (sewer purposes) will be provided in the EIS.
4. Henry T. Au, the traffic consultant for the proposed project, has reviewed your concerns and provides the following disposition:

"Under the regulations of the Waikiki Special Design District, open space for the project amounts to 50 per cent at the ground level. The construction of the proposed project, therefore, will present less of a problem than the construction of other hotels and apartments on Kuhio Avenue prior to the establishment of the Waikiki Special Design District. Since the construction of these hotels and apartments with a higher height limit and less open space did not result in changes in the traffic flow over Kuhio Avenue and the side streets, the traffic flow over Kuhio and Seaside Avenues will not be affected. Furthermore, the delivery of construction materials and the transport of heavy equipment are not movements that occur daily. Once the heavy equipment are transported, the equipment will remain at the site until they are no longer needed. With a large open space for the storage of materials and heavy equipment, the

(cont'd.)

Mr. Robert R. Way
5 July 1977
Page Two

impact of traffic and circulation on Kuhio Avenue during the construction period will be minimal and it will be possible to protect the public and highway user and to move the maximum volume of traffic through the construction site with safety and minimum inconvenience, nuisance and delay."

This information will be incorporated into the EIS.

We hope your comments were adequately addressed. The EIS should be completed shortly and circulated to various agencies. Your review and further comments on this forthcoming EIS would be appreciated.

Very truly yours,

BOONE & ASSOCIATES, INC.


Warner G. Boone, A. I. A.
President

Attachment (Excerpt from Socioeconomic Impact Study)

cc: Department of Land Utilization
S & M Partners
Environmental Communications, Inc.

Excerpt from Socioeconomic Impact Study:

Residential Impact: Tables 8 through 12 summarize the perceptual, emotional, and attitudinal effects of the anticipated displacement of the 35 residents in the 23 apartment units surveyed. Basically, the tenants considered the building to be economically, socially, and locationally desirable. A majority of the tenants are not pleased with the prospects of relocating, for 74 percent indicated they had not anticipated relocation prior to 1978, unless they are forced out by the proposed development. On the other hand, residents of one-third of the units indicated that forced relocation would not pose serious hardships for them, generally because they anticipated moving anyway.

BOONE
& ASSOCIATES
INC.

Table 8. WHAT ARE SOME POSITIVE ATTRIBUTES OF THE SEASIDE SURF HOTEL?

Item	Responses (some persons gave more than one)
Low rent and costs	15
Convenient (near work, in Waikiki, close to "where it's at")	23
Desirable place to live (good neighbors, clean, safe neighborhood)	14
Special attention from the hotel	3
No particular reason	1

Table 9. AWARE OF PLANS TO DEMOLISH THE SEASIDE SURF HOTEL?

Not at all	10
Some, but don't know details	11
Yes, in detail	2
Total	23

Table 10. IF YOU HAD TO LEAVE THIS HOTEL, WHERE WOULD YOU CHOOSE TO RELOCATE?

Waikiki	18
Elsewhere in Hawaii	1
Mainland	2
Uncertain	2
Total	23

Table 11. RELOCATION WOULD BE CAUSED BY PROPOSED DEVELOPMENT?

Yes	17
No	4
Uncertain	2
Total	23

Table 12. SERIOUS HARDSHIPS IN CASE YOU MUST RELOCATE?

Yes, financial	10
Yes, emotional	2
Yes, it is hard to find a new place	8
No	8
Total	28 (some persons responded more than once)

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU
HONOLULU, HAWAII 96814

FRANK F. FAN
MAJOR

RICHARD K. SHARPLESS
TRAINING DIRECTOR



FRANCIS KEALA
CHIEF

EUGENE FLETCHER
DEPUTY CHIEF



OUR REFERENCE DL-PP
YOUR REFERENCE

June 3, 1977

Mr. Warner G. Boone, A.I.A.
President
Boone & Associates, Inc.
505 Ward Avenue
Honolulu, Hawaii 96814

Dear Mr. Boone:

Subject: Proposed Waikiki Tennis-Commercial
Building, Waikiki, City and County
of Honolulu

This is in reply to your letter regarding the proposed Waikiki
Tennis Commercial Building in Waikiki.

During the construction phase and upon completion of the project,
we anticipate an increase in called-for services. Present police
services provided for that area should be adequate to handle the
expectant increase.

Areas of concern during the construction phase would be noise
and traffic congestion complaints. Strict adherence to Public
Health Regulations on Community Noise Control for Oahu and prior
planning for the relief of traffic congestion surrounding public
roadways desiring entry into the site will tend to minimize any
inconvenience to the general public and subsequent police
intervention.

Thank you for providing us with the opportunity to review your
proposal. If we can be of any further assistance, please do not
hesitate to write us.

Sincerely,

FRANCIS KEALA
Chief of Police

SEARCHED	INDEXED
SERIALIZED	FILED
JUN 8 1977	
HONOLULU, HAWAII	
APPROVED	DATE

Our data show that the apartments have been used
as a somewhat short-term place of residence for most of
the tenants, who are self-supporting, but often with fairly
low incomes. The major problem faced by the present tenants
due to their forced relocation would be financial in nature.
They realistically perceive very few opportunities to find
equivalently located housing at similar prices. Further,
many are particularly concerned that they would be forced to
pay far higher deposits than the nominal amounts required by
the Seaside Surf Hotel.

In summary, the residential impact would be clearly
to negate the present functions of the apartment complex,
which have been: (1) to provide a place to live for new
residents of Hawaii recently arrived from the Mainland during
the interim period between their arrival and the subsequent
consolidation of employment and social contacts that enable
them to move to a more permanent location; and (2) to provide
the few long-term residents with what they consider desirable
places to live at a price lower than would be charged at
similar locations. Also, the approximate full-time-equivalent
jobs presently associated with the rentals would be lost.

BOONE & ASSOCIATES, INC.

ARCHITECTURE
ENGINEERING
& PLANNING
505 WARD AVE
HONOLULU
HAWAII 96814
PH 537-2571

5 July 1977

Chief Francis Keala
Police Department
City & County of Honolulu
1455 South Beretania Street
Honolulu, Hawaii 96814

Dear Chief Keala:

Subject: Environmental Impact Statement Preparation Notice for the
Proposed Waikiki Tennis-Commercial Building

We have received your response of June 3, 1977 regarding the above mentioned Environmental Impact Statement Preparation Notice. The information provided in your letter will be helpful in our evaluation of the project's impact on police services. In regards to your concern about the noise, we note that Ronald A. Darby and Associates have prepared a noise impact analysis in which several mitigation measures were recommended. At this time it is the opinion of the noise consultant that:

- "1. The noise emanating from the proposed project will not be detrimental or excessive and will generally be masked or blend in with the background noise in the neighborhood.
 - "2. Under normal use, the noise from the parking operations and the tennis activities will not violate DCH regulations."
- Understandably, there may be individual instances of noise disturbances, however, should these nuisances occur frequently, the developer will consider other noise mitigation measures.

Thank you for your letter. Upon completion of the Environmental Impact Statement, we will send you a copy for your further review and comment.

Very truly yours,

BOONE & ASSOCIATES, INC.

Warner G. Boone
Warner G. Boone, A.I.A.
President

cc: Department of Land Utilization
S & M Partners
Environmental Communications, Inc.

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU
880 SOUTH KING STREET
HONOLULU, HAWAII 96813



FRANK F. PARI
MAYOR

YOUNG BOK KO
DIRECTOR

June 13, 1977

Boone & Associates, Inc.
505 Ward Avenue
Honolulu, Hawaii 96814

Gentlemen:

SUBJECT: PRELIMINARY REVIEW
WAIKIKI TENNIS -- COMMERCIAL BUILDING
TMK 2-6-22: 4, 5, 19-22 por. 24, 25,
28, 31, 32 & 33

We have no objection to the proposed Waikiki Tennis - Commercial Building project to be built in Waikiki. The project will offer beneficial recreational facilities for both visitor and local residents in the Waikiki area.

Sincerely,

Young Bok Ko
YOUNG BOK KO, DIRECTOR

BOONE & ASSOCIATES, INC.
JUN 15 1977
RECEIVED
OFFICE OF THE DIRECTOR

BOONE & ASSOCIATES, INC.
 ARCHITECTURE
 ENGINEERING
 PLANNING
 5 WARD AVE
 HONOLULU
 HAWAII 96814
 (537-2571)

5 July 1977

Mr. Young Suk Ko, Director
 Department of Parks and Recreation
 City & County of Honolulu
 650 South King Street
 Honolulu, Hawaii 96813

Dear Mr. Ko:

Subject: Environmental Impact Statement Preparation Notice for the
 Proposed Waikiki Tennis-Commercial Building

Thank you for your letter of June 13, 1977. We will incorporate your
 comments into the Environmental Impact Statement presently being prepared.
 This Environmental Impact Statement will contain more detailed information
 about the proposed project and will discuss the existing public tennis
 facilities in the Waikiki area.

Upon completion of the Environmental Impact Statement a copy will be
 sent to you for your further review and comment.

Very truly yours,

BOONE & ASSOCIATES, INC.

Warner G. Boone
 Warner G. Boone, A.I.A.
 President

cc: Department of Land Utilization
 S & M Partners
 Environmental Communications, Inc.

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU

630 SOUTH BERETANIA

HONOLULU, HAWAII 96813



June 13, 1977

FRANK F. FASI, Mayor
 YOSHIE H. FUJINAKA, Chairman
 STANLEY S. TAKAHASHI, Vice Chairman

EDWARD F. C. LAM
 TERESITA B. JURINSKY
 E. ALVEY WRIGHT
 Wallace S. Miyahira
 Fred Bailey

EDWARD Y. HIRATA
 Manager and Chief Engineer

Mr. Warner G. Boone, A.S.A.
 President
 Boone & Associates, Inc.
 505 Ward Avenue
 Honolulu, Hawaii 96814

Dear Mr. Boone:

Subject: Your Letter of May 24, 1977 Requesting
 Comments for the Proposed Waikiki
 Tennis-Commercial Building

We have the following comments regarding the proposed
 project:

1. Construction plans are to be submitted to us for
 review and approval.
2. The estimated water demand for the project must
 be determined. Any water demand greater than
 that presently being served requires our approval.

Please contact Lawrence Whang at 548-5221, if further
 information is needed.

Very truly yours,

Edward Y. Hirata
 Edward Y. Hirata
 Manager and Chief Engineer

BOONE & ASSOCIATES, INC.
 JUN 16 1977
 HONOLULU, HAWAII

BOONE & ASSOCIATES, INC.

ARCHITECTURE
ENGINEERING
& PLANNING
505 WARD AVE
HONOLULU
HAWAII 96814
PH 537-2571

5 July 1977

Mr. Edward V. Hirata
Manager and Chief Engineer
Board of Water Supply
City & County of Honolulu
630 South Beretania Street
Honolulu, Hawaii 96813

Dear Mr. Hirata:

Subject: Environmental Impact Statement Preparation Notice for the
Proposed Waikiki Tennis-Commercial Building

Thank you for your letter of June 13, 1977 regarding the Environmental Impact Statement Preparation Notice. The engineering consultant will be contacting your office regarding your department's review and approval of construction plans. Additionally, the water demand was estimated to be approximately the same as the existing water demand. Therefore, we do not anticipate a significant difference between the existing and proposed water demand.

We are presently in the process of preparing the EIS for the proposed project. Upon its completion and submittal to the Environmental Quality Commission, the EIS will be circulated for review and comments from various agencies. We hope that you will take the opportunity to review and further comment on this more detailed environmental document.

Very truly yours,

BOONE & ASSOCIATES, INC.


Warner G. Boone, A.E.A.
President

cc: Department of Land Utilization
S & M Partners
Environmental Communications, Inc.

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU
HONOLULU MUNICIPAL BUILDING
850 SOUTH KING STREET
HONOLULU, HAWAII 96813



FRANK F. PARI
MAYOR

KAZU HAYASHIDA
DIRECTOR

TE5/77-2387

June 28, 1977

Environmental Communications Inc.

P.O. Box 536
Honolulu, Hawaii 96809

Gentlemen:

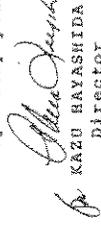
Subject: Consultation Process Prior to Filing
the EIS for the Proposed Waikiki
Tennis-Commercial Building
TMK: 2-6-22: 4, 5, 19, 20, 21, 22,
POR. 24, 25, 28, 31, 32, 33

In preparing the EIS, we suggest that you address yourselves to the following:

1. An evaluation of ingress and egress locations.
2. Consideration to any access planned for Kuhio Avenue.

For your information Kuhio Avenue is the planned main arterial for Waikiki.

Very truly yours,


KAZU HAYASHIDA
Director

BOONE & ASSOCIATES, INC.

ARCHITECTURE
ENGINEERING
& PLANNING
505 WARD AVE
HONOLULU
HAWAII 96814
PH 537-2571

5 July 1977

Mr. Kazu Hayashida, Director
Department of Transportation Services
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Hayashida:

Subject: Environmental Impact Statement Preparation Notice for the
Proposed Waikiki Tennis-Commercial Building

Thank you for your letter of June 28, 1977 relating to the above indicated Environmental Impact Statement Preparation Notice. The traffic consultant for the proposed project, Henry I. Au, has provided the following disposition in response to your comments on transportation.

"The layout and the number of exits and entrances will affect the capacities of the abutting streets and the usual procedure is to determine the peak traffic volume to be assigned to each exit and entrance. However, in this instance, since the facilities are designed to accommodate the tourists, most of whom will walk from the hotels in Waikiki, there will not be any distinct peak traffic flow or volume using the parking facilities. The traffic flow in and out of the parking garage will be relatively constant throughout the day, with a slightly higher peak during the daytime between the peak commuting hours of a highway or during the evening hours. The traffic generated by the parking facilities, therefore, will cause only a mild traffic impact on the abutting street during the peak commuting hours.

The 456 parking stalls* will generate approximately 2,280 trips per day for the 12 hour period from 9:00 A.M. to 9:00 P.M., assuming parking turnover to average approximately 5. If the peak hour is 10 per cent of the daily volume of 2,280 trips, the number of trips generated would total only 228. Thus, only one combination exit and entrance need be provided for the 456 parking stalls.

*The 456 parking stalls are used as the maximum amount of parking stalls which will be provided as an alternative for the proposed structure. Presently, plans call for a total of 306 parking stalls which would consequently cause less congestion than the evaluation on 456 stalls.

(cont'd.)

Mr. Kazu Hayashida
5 July 1977
Page Two

So as to achieve the highest level of safety and to prevent any significant congestion on the main arterial (Kuhio Avenue), the combination exit and entrance will be located on Seaside Avenue approximately 170 feet from the Kuhio Avenue intersection. This location is more suitable than one on Kuhio Avenue, since access to a parking lot from a major highway always contributes to congestion as well as traffic accidents. This is because motorists entering the lot must slow down, causing traffic on the major highway to also slow down. If the parking spaces are all occupied, other motorists waiting to enter the parking garage will use one lane of the major highway as a storage lane, thus eliminating or curtailing one lane of the major highway for the movement of traffic."

We hope that your concerns have been adequately addressed. We will be incorporating this information into the narrative of the EIS. We hope that you will take the opportunity to review the EIS when circulated and provide further comments. For your further information, we will provide your department with a copy of the traffic impact statement which has been prepared for the proposed project.

Very truly yours,

BOONE & ASSOCIATES, INC.


Warner G. Boone, P.E., I.A.
President

cc: Department of Land Utilization
S & M Partners
Environmental Communications, Inc.

GEORGE R. ARYORSKI
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HEALTH

P.O. Box 3315
HONOLULU, HAWAII 96814

June 5, 1977

GEORGE A. L. YUEN
DIRECTOR OF HEALTH
ANDREW W. MAYER, M.D., M.P.H.
Deputy Director of Health
HENRY R. THOMPSON, M.A.
Deputy Director of Health
JAMES S. KUMAGAI, Ph.D., P.E.
Deputy Director of Health

In reply, please refer to
file # EPRS-SS

Mr. Warner G. Boone, A.I.A.
President
Boone & Associates, Inc.
505 Ward Ave.
Honolulu, Hawaii 96814

Dear Mr. Boone:

Subject: EIS Preparation Notice for the Proposed Waikiki Tennis-Commercial
Building, Waikiki, City & County of Honolulu

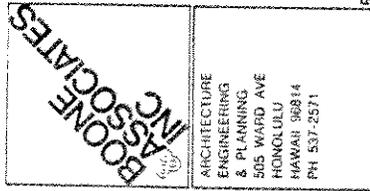
Thank you for allowing us to review and comment on the proposed
Waikiki Tennis-Commercial Building. We appreciate your early
coordination with this Department.

We feel that the EIS should include a quantitative analysis of the
air quality effects of the proposed project due to its location in an
extremely dense urban area.

Should you have any questions or comments concerning this letter,
please call our Pollution Technical Review Branch at 548-6410.

Sincerely,


JAMES S. KUMAGAI, Ph.D.
Deputy Director for
Environmental Health



5 July 1977

Dr. James S. Kumagai
Deputy Director for Environmental Health
Department of Health
P. O. Box 3378
Honolulu, Hawaii 96801

Dear D. Kumagai:

Subject: Environmental Impact Statement Preparation Notice for the
Proposed Waikiki Tennis-Commercial Building

Thank you for your letter of June 5, 1977 regarding the Environmental
Impact Statement Preparation Notice for the above mentioned project.
In regards to your concern about the project's impact on air quality,
the air consultant has prepared an air quality report which provides
quantitative analysis of the impact of the proposed project on air
quality. This air quality report will be provided to your department
for your information and review upon the submittal of the Environmental
Impact Statement.

Very truly yours,

WARNER G. BOONE, A.I.A.
BOONE & ASSOCIATES, INC.


Warner G. Boone, A.I.A.
President

cc: Department of Land Utilization
S & M Partners
Environmental Communications, Inc.

Stamp: BOONE & ASSOCIATES, INC. JUN 17 1977. Includes fields for Route To, Route To, Acknowledged, and File with.



DEPARTMENT OF PLANNING AND ECONOMIC DEVELOPMENT

Kaunalei Building, 250 South King St., Honolulu, Hawaii • Mailing Address: P. O. Box 2359, Honolulu, Hawaii 96804

GEORGE R. ARIYOSHI
Governor
HIDETO KONO
Director
FRANK SOKIVAREK
Deputy Director

Ref. No. 3876

June 21, 1977

Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809
 Gentlemen:

Subject: Environmental Impact Statement Preparation Notice for the Proposed Waikiki Tennis-Commercial Building, Waikiki, City and County of Honolulu

We have reviewed the subject EIS Preparation Notice and wish to offer the following comments for your consideration during the preparation of the forthcoming EIS:

1. In general, the potentially major environmental impacts which should receive thorough assessment in the EIS seem to have been adequately identified in the EIS preparation notice.
2. Since visual impact will be an important consideration in a project of this size, the EIS should provide an adequate graphic description of the project as it relates to surrounding structures and open spaces.
3. A specific and objective discussion of the project as it relates to the intents of the Waikiki Special Design District would be highly desirable.

Thank you for this opportunity to review and comment on the EIS Preparation Notice.

Sincerely,

HIDETO KONO

BOONE & ASSOCIATES, INC.

ARCHITECTURE
ENGINEERING
& PLANNING
505 WARD AVE
HONOLULU
HAWAII 96814
PH 537-2571

5 July 1977

Mr. Hideto Kono, Director
Department of Planning and Economic Development
P. O. Box 2359
Honolulu, Hawaii 96804

Dear Mr. Kono:

Subject: Environmental Impact Statement Preparation Notice for the Proposed Waikiki Tennis-Commercial Building

Thank you for your letter of June 21, 1977 on the above mentioned EIS Preparation Notice. We have addressed each of your three comments below:

1. No response required.
2. At this time we are in the process of depicting the visual impact of the proposed structure. Please be assured that this graphic description will be provided in the Environmental Impact Statement.
3. The Environmental Impact Statement will include a specific section which evaluates the project as it relates to the Waikiki Special Design District (MSDD), as well as Oahu's General Plan (policies) and the environmental goals and guidelines established by Chapter 342 and 344, Hawaii Revised Statutes.

We hope that these responses have met your concerns. The Environmental Impact Statement should be completed shortly. Your department's review and further comments on this document would be appreciated.

Very truly yours,

BOONE & ASSOCIATES, INC.

Warner G. Boone, A.I.A.
President

cc: Department of Land Utilization
S & N Partners
Environmental Communications, Inc.

GEORGE R. ARIYOSHI
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
P. O. BOX 921
HONOLULU, HAWAII 96809

CHRISTOPHER COBB, CHAIRMAN
BOARD OF LAND & NATURAL RESOURCES
EDGAR A. HANASU
DEPUTY TO THE CHAIRMAN

DIVISIONS:
ADVISOR
FISH AND GAME
FORESTRY
LAND MANAGEMENT
NATURAL PARKS
WATER AND LAND DEVELOPMENT

June 21, 1977

Mr. Warren G. Boone, A.I.A.
President
Boone & Associates, Inc.
505 Ward Ave.
Honolulu, HI 96814

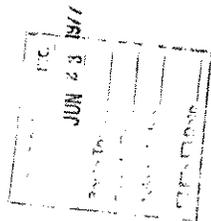
Dear Mr. Boone:

We have no comments to offer on the
EIS preparation notice for the proposed
Waikiki Tennis and Commercial Building.

Very truly yours,

GORDON SOH
Program Planning Coordinator

cc: Historic Sites



University of Hawaii at Manoa

Environmental Center
Crewford 317 • 2550 Campus Road
Honolulu, Hawaii 96822
Telephone (808) 948-7391

Office of the Director

June 7, 1977

Environmental Communications, Inc.
P.O. Box 536
Honolulu, Hawaii 96809

Gentlemen:

We have received your request for comment on the Environmental Impact
Statement Preparation Notice for the proposed Waikiki Tennis-Commercial
Building. It has been our policy at the Center, however, not to engage in
the consultation process of proposed actions so as not to conflict with our
capacity as a reviewing body for environmental impact statements. Fine
permitting, we would be glad to review the environmental impact statement for
the proposed action when it is prepared.

Yours truly,

Doak C. Cox
Director

UNIVERSITY OF HAWAII

Water Resources Research Center

June 8, 1977

Environmental Communications, Inc.
P.O. Box 536
Honolulu, Hawaii 96809

Dear Sirs:

Subject: Environmental Impact Statement Assessment/Determination
Maikiki Special Design District, 77/WSDD-6, Waikiki
Tennis - Commercial Building

We have reviewed the above EIS preparation notice and have no
critical comment. We appreciate the opportunity to participate in
this EIS review.

Sincerely,

Reginald H. F. Young
Assistant Director, WRRRC

RHFY:sn

2540 Dale Street, Honolulu, Hawaii 96822
Tel. 535-4141

6/14/77



DEPARTMENT OF THE ARMY
HONOLULU DISTRICT, CORPS OF ENGINEERS
BLDG 290, FT. SHAFTER
APO SAN FRANCISCO 96356

PODED

27 June 1977

Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Gentlemen:

We received the Environmental Impact Statement Preparation Notice for
the proposed Maikiki Tennis-Commercial Building on May 27, 1977. At
this time, we offer the following comment:

Based on information available to this office, the properties
located near the intersection of Kuhio and Seaside Avenue to be
affected by the proposed building are not subject to inundation
by the 100-year tsunami. However, these parcels are located within
the 100-year flood level of the Ala Wai Canal.

Thank you for the opportunity to review this Notice.

Sincerely,

for KISUK CHONG
KISUK CHONG
Chief, Engineering Division



AMERICAN LUNG ASSOCIATION of Hawaii

June 8, 1977

Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Gentlemen:

Subject: Waikiki Tennis-Commercial Building

Since the subject project includes tennis courts, commercial and office space and parking facilities all of which will attract vehicular traffic to the site, it must be considered an indirect source of air pollution. We, therefore, suggest that as a minimum the air quality impact in the vicinity of the project site and along access roads used by traffic attracted to the facility be assessed using the procedures described in the following EPA publication:

Guidelines for Air Quality Maintenance Planning and Analysis, Volume 9: Evaluating Indirect Sources, EPA-450/4-75-001, January, 1975.

Sincerely,


James W. Morrow, Director
Environmental Health

JMM:ct

cc: Dr. Richard Marland, OERQC
Mr. Gary Noda, DLJ

BOONE & ASSOCIATES
ARCHITECTURE
ENGINEERING
& PLANNING
505 WARD AVE
HONOLULU
HAWAII 96814
PH 537-8574

5 July 1977

Mr. Kisuk Cheung, Chief
Engineering Division
Honolulu District, Corps of Engineers
Department of the Army
Building 230, Fort Shafter
APO San Francisco 96358

Dear Mr. Cheung:

Subject: Environmental Impact Statement Preparation Notice for the Proposed Waikiki Tennis-Commercial Building

Thank you for your comment of June 27, 1977 regarding the above indicated Preparation Notice. Your information regarding the project being located within the 100-year flood level of the Ala Mai Canal will be incorporated into the narrative of the Environmental Impact Statement. At this time, we feel that because of the height of the building and its distance from the Ala Mai Canal, there should be very little possibility that the commercial spaces located on the floor level of the building would be significantly affected. We will continue to investigate this matter and discuss it in the Environmental Impact Statement.

Your comments will be included in the Environmental Impact Statement. Upon completion of the Environmental Impact Statement, we will send you a copy for your further review and comment.

Very truly yours,

BOONE & ASSOCIATES, INC.


Warner G. Boone, A.I.A.
President

cc: Department of Land Utilization
S & M Partners
Environmental Communications, Inc.

BOONE & ASSOCIATES, INC.

ARCHITECTURE
ENGINEERING
PLANNING
305 WARD AVENUE
HONOLULU
HAWAII 96814
PHONE 537-2571

5 July 1977

Mr. James M. Morrow, Director
Environmental Health
American Lung Association of Hawaii
245 North Kukui Street
Honolulu, Hawaii 96817

Dear Mr. Morrow:

Subject: Environmental Impact Statement Preparation Notice for the
Proposed Waikiki Tennis-Commercial Building

Thank you for your letter of June 8, 1977. We would like to note that our air consultant for this proposed project has completed the Air Quality Impact Study for this project. In the process of determining the air quality impact, several references were used including the one identified in your letter "Guidelines for Air Quality Maintenance Planning and Analysis, Volume 9: Evaluating Indirect Sources, EPA-450/4-75-001, January, 1975".

We will incorporate your comments as well as our response into the Environmental Impact Statement.

Very truly yours,

BOONE & ASSOCIATES, INC.

Warner G. Boone

Warner G. Boone, A.I.A.
President

cc: Department of Land Utilization
S & M Partners
Environmental Communications, Inc.

WARNER G. BOONE, AIA • WYNNE M. TAKATA • PAULY M. JANSKA - ASSOCIATES

WAIKIKI
IMPROVEMENT
ASSOCIATION, INC.

SUITE 1410 • 2222 KALANIANA'OLE AVENUE • HONOLULU, HAWAII 96815 • TEL. 923-1094

Officers
ROBERT E. MACGREGOR, President
DEAN T. W. HO, First Vice President
VERN WALDO, Second Vice President
PHILIP F. SWAYER, Secretary
GAIL-LOU WATSON, Treasurer

Board of Directors

LUDWIG AMMERING, President

Western Golf Inc.

WYNNE M. TAKATA, Treasurer

WILLIAM W. CHING, Secretary

BONNIE P. BLAYNE SHARPE, Director

FRANK H. G. COREY (RET.), Director

RONALD H. DEISSEROTH, Director

Oakbrook Enterprises Ltd.

CLYDE D. DOHMAN, Director

Incip President, Marketing

International

ART GORDON, Director

General Manager,

Consolidating Amusement Co. Ltd.

Consolidating Amusement Co. Ltd.

WYNNE M. TAKATA, Director

June 17, 1977

Mr. Warner G. Boone, AIA
Boone & Associates, Inc.
505 Ward Avenue
Honolulu, Hawaii 96814

Re: EIS Consultation - Tennis-Commercial Building, Waikiki

Dear Mr. Boone:

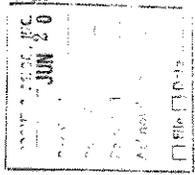
WIA's comments on the above EIS preparation notice follow:

1. We welcome the proposed addition of new recreational facilities in the Waikiki area.
2. We welcome the provision of a medium-rise building in the location suggested.
3. If all of the requirements, including adequate parking, of the WSDD are met, the impact on the environment will have been appropriately accommodated.

Very truly yours,

D. A. Bremner
Donald A. Bremner
Executive Vice President

DAB/dt



BOONE & ASSOCIATES
(U)

ARCHITECTURE
ENGINEERING
& PLANNING
505 WARD AVE
HONOLULU
HAWAII 96814
PH 537-2571

5 July 1977

Mr. Donald A. Bremner
Executive Vice President
Waikiki Improvement Association, Inc.
2222 Kalaheua Avenue, Suite 1410
Honolulu, Hawaii 96815

Dear Mr. Bremner:

Subject: Environmental Impact Statement Preparation Notice for the
Proposed Waikiki Tennis-Commercial Building

Thank you for your comments regarding the above indicated Environmental
Impact Statement Preparation Notice. Your comments will be incorporated
into the Environmental Impact Statement along with other comments re-
ceived during the EIS consultation period.

In regards to your item No. 3 on adequate parking, we note that plans
call for the CIC parking requirements to be exceeded, thus providing
surplus parking with regards to legal requirements.

Upon completion of the Environmental Impact Statement, we will be pro-
viding your association with a copy of the EIS for your further review
and comment.

Very truly yours,

BOONE & ASSOCIATES, INC.

Warner G. Boone, A.I.A.
President

cc: Department of Land Utilization
S & M Partners
Environmental Communications, Inc.

June 23, 1977

Environmental Communications, Inc.
P.O. Box 536
Honolulu, Hawaii 96809

Attention: Boone and Associates

Dear Mr. Boone:

The copy of the Environmental Impact Statement
Preparation Notice is received, and I have the following
comments:

1. Recognizing that, at present, the area is zoned
as "resort commercial", we regret having 42 housing units
removed from Waikiki. We feel that the one thing that will
stabilize the area - as all U.S.A. cities have found about
their commercial areas - is to have a balance of resi-
dential and business in the same community. Therefore,
we would suggest adding 42 housing units to the building.

2. The one redeeming factor of your proposal is that
it would provide recreation to residents, upon whom, I be-
lieve, you will need to rely! We suggest you also provide
"free" to the community a few meeting rooms for neigh-
hood groups to hold public meetings. I'm sure you would
build a lot of good-will.

We will have other comments as the proposal goes
to the various agencies.

Yours truly,

Donald R. Hanson, President
Waikiki Residents Association

CC: Environmental Quality Commission, 550 Halekeuile St.

BOONE & ASSOCIATES, INC.

STRUCTURE
ENGINEERING
& PLANNING
465 WARD AVE
HONOLULU
HAWAII 96814
HI 537-2571

5 July 1977

Mr. Donald R. Hanson
President
Maikiki Residents Association
2222 Kalakaua Avenue
Honolulu, Hawaii 96815

Dear Mr. Hanson:

Subject: Environmental Impact Statement Preparation Notice for the
Proposed Maikiki Tennis-Commercial Building

Thank you for your letter of June 23, 1977 on the Environmental Impact Statement Preparation Notice for the proposed Maikiki Tennis-Commercial Building. As you have noted, the zoning designation of resort commercial precludes the mixed use of residential and commercial. The Department of Land Utilization would in all probability not view this recommendation with too much favor. The socioeconomic section in the EIS will detail for your review, the impact as anticipated on the tenants who have been on a month-to-month basis for some time. Also, the description of the tenants provides an insight into their present status as well as their origin, and it can be concluded that they are, for the most part, highly transient.

The suggestion as to the providing of meeting rooms for the residents will be evaluated in the spirit it was offered. There is doubt as to whether or not "free" usage can be accomplished, but perhaps one of the prospective commercial tenants might be inclined to make space available on a limited basis.

Again, thank you for your comments and we look forward to hearing from you in the review of the Environmental Impact Statement.

Very truly yours,

BOONE & ASSOCIATES, INC.

Warner G. Boone
Warner G. Boone, A.I.A.
President

cc: Department of Land Utilization
S & M Partners
Environmental Communications, Inc.

XI. SUMMARY OF UNRESOLVED ISSUES

"Summary of unresolved issues and either a discussion of how such issues will be resolved prior to commencement of the action, or what overriding reasons there are for proceeding without resolving such problems."

Environmental Impact Statement Regulations, Environmental Quality Commission, State of Hawaii. Sub-Part E., 1:42 Content Requirements, n.

At this time, there are no known unresolved issues relating to this proposed project.

XII. LIST OF NECESSARY APPROVALS

"List of necessary approvals, required for the action, from governmental agencies, boards, or commissions or other similar groups having jurisdiction must be included here. The status of each identified approval shall also be described."

Environmental Impact Statement Regulations, Environmental Quality Commission, State of Hawaii. Sub-Part E., 1:42 Content Requirements, o.

The following approvals and permits must be obtained prior to the implementation of the proposed project.

1. Environmental Impact Statement EIS Acceptance - (project is located within the Waikiki-Diamond Head Area), Department of Land Utilization.
2. Waikiki Special Design District (Waikiki Development Conformance Certificate) - Department of Land Utilization (line agency) and City Council (decision making body).
3. Grading Permit - Department of Public Works (also will review plans in regards to approving the location of the project within the Ala Wai Canal's 100-year flood level).
4. Building Permit - Building Department
5. Other General Building Permits (relating to utilities and trades) will be obtained by the Contractor from the appropriate private and governmental agencies as stipulated in the contractor's specifications).

XIII. ORGANIZATIONS AND PERSONS CONSULTED AND
THE REPRODUCTION OF COMMENTS AND
RESPONSES MADE DURING THE EIS REVIEW PERIOD

Sixty-five (65) copies of the EIS were transmitted to the Environmental Quality Commission (EQC) on July 20, 1977. In addition to these copies, five (5) copies of the EIS were provided to the Department of Land Utilization (the approving agency). The Environmental Quality Commission acknowledged the receipt of the EIS and provided a list of agencies and individuals to whom the EIS was sent. (See Exhibit A - Letter from EQC to Department of Land Utilization acknowledging receipt of the EIS; Exhibit B - List of Agencies/Individuals receiving the EIS.)

Table 21 identifies the agencies and persons commenting on the EIS. Copies of the responses to the comments are provided immediately after the comment.

GEORGE R. ARIYOSHI
GOVERNOR



EXHIBIT A
ALBERT Q. Y. TOM
Chairman

R

TELEPHONE NO.
548-6915

STATE OF HAWAII
ENVIRONMENTAL QUALITY COMMISSION
OFFICE OF THE GOVERNOR
550 HALEKAUWILA ST.
ROOM 301
HONOLULU, HAWAII 96813

July 20, 1977

George Moriguchi, Director
Dept. of Land Utilization
City and County of Honolulu
650 S. King Street
Honolulu, Hawaii 96813

SUBJECT: Environmental Impact Statement for the Waikiki
Tennis-Commercial Building

Dear Mr. Moriguchi:

Copies of the EIS's will be officially filed on July 20, 1977, which is the start of the sixty day process period. Pursuant to Chapter 343, Hawaii Revised Statutes, we have sent copies of the statement to the agencies and organizations indicated on the attached distribution list. To allow for a 30-day public review period, deadline date for comments is August 22, 1977. Availability of the EIS will be published in the July 23, 1977 EQC Bulletin. All written comments will be directed to your agency with a copy to Environmental Communications Inc.

If you should have any questions regarding this matter, please contact Allan Suematsu at 548-6915.

Sincerely,

Allan Suematsu

for Donald Bremner
Deputy Chairman

Attachment

cc: Environmental Communications, Inc. ✓
OEQC, with attachment

7/21/77

E.A. EIS Applicant Action Agency Action

Project Name: Waikiki Tennis-Commercial Building

Location: Waikiki, Oahu, Hawaii

Proposing Agency/Applicant: S&M Partners

Accepting Authority/Approving Agency: Dept. of Land Utilization, C&C of Honolulu

Date Sent: July 19, 1977

Deadline Date: _____

STATE AGENCIES

	Amount Sent	Remarks
<u>DEQC</u>	1	
Dept. of Agriculture	+	
Dept. of Land and Natural Resources (3)	3	
Dept. of Health (1)	4	
Dept. of Planning and Economic Development	7	
Dept. of Defense	7	
Dept. of Accounting and General Services	+	
Dept. of Social Services and Housing	+	
Dept. of Transportation (3)	3	
Dept. of Education	+	
<i>NR State Historic Preservation Officer</i>	+	
<u>UNIVERSITY OF HAWAII</u>		
Environmental Center (4)	4	
Water Resources Research Center	+	
Gene Programs	7	
<u>FEDERAL</u>		
Environmental Protection Agency	+	
Army Corps of Engineers	+	
Fish and Wildlife Service	x	
Bird Conservation Service	+	
BWg/DEE	+	
- Commanding General/Environmental Section	x	
Y	+	
- DAFE	+	
Coast Guard	+	
<u>NEWS MEDIA</u>		
Honolulu Star Bulletin		
Advertiser	x	
Sun Press - Oahu	+	
Voices of Hawaii - UH		
Hawaii Tribune - Hawaii		
Hawaii Today - Kona		

R

NEWS MEDIA (Continued)

Amount
Sent

Remarks

Lehaina Sun - Maui		
Maui News - Maui		
Bruce Bowen - Molokai		
Ka Molokai - Molokai		
The Garden Island Newspaper - Kauai		

HONOLULU - CITY & COUNTY AGENCIES

Dept. of General Planning		
Dept. of Land Utilization		
Dept. of Transportation Services		
Dept. of Parks and Recreation		
Dept. of Public Works		
Board of Water Supply		
Dept. of Housing & Community Development		
Mass Transit Division		
Building Department		

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HAWAII - COUNTY AGENCIES

Planning Department		
Dept. of Public Works		
Dept. of Parks and Recreation		
Dept. of Water Supply		
Dept. of Research and Development		

MOLOKAI - COUNTY AGENCIES

Planning Department (2)		
Dept. of Public Works		
Dept. of Parks and Recreation		
Dept. of Water Supply		
Economic Development Agency		

MAUI - COUNTY AGENCIES

Planning Department		
Dept. of Public Works		
Dept. of Water Supply		

Amount
Sent

R Amount
Sent

1. Waikiki Residents Assoc.
2222 Kalakaua Ave.
#1308
Honolulu, Hawaii 96815

2. Jim Morrow
American Lung Assoc. of HI
245 N. Kukui St.
Honolulu, HI

SUPPORT STUDIES Sent to:

1. OECC +
2. EQC. 2
3. EC, UH +
4. Main Branch, State Library +
5. Waikiki Branch Library +

Table 21. Agencies and Persons Commenting on the Environmental Impact Statement

<u>City and County of Honolulu</u>	<u>Agency/Organization</u>	<u>Date of Comment</u>	<u>Date of Response</u>	<u>Copy of Comment on Page</u>
	*Department of Public Works	7/27/77	--	XIII-9
	Department of Parks and Recreation	8/2/77	8/25/77	XIII-10
	Department of General Planning	8/2/77	8/25/77	XIII-11
	*Department of Housing and Community Development	8/3/77	--	XIII-12
	Board of Water Supply	8/5/77	8/25/77	XIII-12
	Department of Land Utilization	8/22/77	9/1/77	XIII-13
	Department of Transportation Services	8/22/77	8/26/77	XIII-19
<u>State</u>				
	*Department of Agriculture	7/25/77	--	XIII-20
	*Department of Education	7/25/77	--	XIII-20
	*Department of Defense	7/26/77	--	XIII-21
	*Historic Preservation Officer, Department of Land and Natural Resources	7/28/77	--	XIII-22
	*Department of Social Services and Housing	7/29/77	--	XIII-22
	*Division of State Parks, Department of Land and Natural Resources	8/2/77	--	XIII-23
	Department of Health	8/12/77	8/25/77	XIII-24

* The letter received from these agencies indicated that they had no comments, therefore, no response was necessary.

Table 21. (Con't.)

<u>Agency/Organization</u>	<u>Date of Comment</u>	<u>Date of Response</u>	<u>Copy of Comment on Page</u>
<u>State (con't.)</u>			
Department of Transportation	8/15/77	8/25/77	XIII-25
Department of Planning and Economic Development	8/16/77	8/25/77	XIII-26
Office of Environmental Quality Control	8/22/77	8/30/77	XIII-27
<u>University of Hawaii</u>			
*Water Resources Research Center	8/11/77	--	XIII-29
<u>Federal</u>			
*Fish and Wildlife Service, U.S. Department of the Interior	7/22/77	--	XIII-30
*Headquarters United States Army Support Command, Hawaii, Department of the Army	7/27/77	--	XIII-30
*Soil Conservation Service, U.S. Department of Agriculture	7/28/77	--	XIII-31
*Department of Transportation, United States Coast Guard	7/29/77	--	XIII-31
*Headquarters 15th Air Base Wing (PACAF) Department of the Air Force	8/11/77	--	XIII-32
Honolulu District, Corps of Engineers, Department of the Army	8/22/77	8/25/77	XIII-32
<u>Private Organizations</u>			
American Lung Association of Hawaii	7/25/77	9/2/77	XIII-33

* The letter received from these agencies indicated that they had no comments, therefore, no response was necessary.

ENV 77-414

July 27, 1977

MEMORANDUM

TO: MR. GEORGE S. MORIGUCHI, DIRECTOR
DEPARTMENT OF LAND UTILIZATION

FROM: WALLACE MIYAHIRA, DIRECTOR AND CHIEF ENGINEER
DEPARTMENT OF PUBLIC WORKS

SUBJECT: ENVIRONMENTAL IMPACT STATEMENT FOR THE PROPOSED
WAIKIKI TENNIS-COMMERCIAL BUILDING, WAIKIKI, HAWAII

We have reviewed the subject EIS and found it satisfactory with respect to the areas of our responsibilities.

WALLACE MIYAHIRA
Director and Chief Engineer

cc: Environmental Communications, Inc.

ENV 77-414

R

DEPARTMENT OF PARKS AND RECREATION
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET
HONOLULU, HAWAII 96813



FRANK F. FASI
MAYOR

F. J. RODRIGUEZ,
PRESIDENT

YOUNG SUK KO
DIRECTOR

ENVIRONMENTAL
COMMUNICATIONS
INC.

August 25, 1977

August 2, 1977

State of Hawaii
Environmental Quality Commission
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Gentlemen:

SUBJECT: ENVIRONMENTAL IMPACT STATEMENT
WAIKIKI TENNIS-COMMERCIAL BUILDING

We have reviewed the Environmental Impact Statement for the proposed Waikiki Tennis-Commercial Building and make the following comments.

We have no objection to the proposed project to be built in Waikiki as the project will offer beneficial recreational facilities for both the visitor and local residents in the Waikiki area.

Sincerely,

YOUNG SUK KO, DIRECTOR

cc: Department of Land Utilization
Environmental Communications, Inc. ✓

Mr. Young Suk Ko, Director
Department of Parks and Recreation
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Ko:

Thank you for your comment on the Environmental Impact Statement for the proposed Waikiki Tennis-Commercial Building. We share your feelings that the proposed tennis facilities will offer beneficial recreational facilities for both the visitor and resident in the Waikiki area.

Very truly yours,

F. J. Rodriguez

cc: S & M Partners
Boone & Associates, Inc.
Environmental Quality Commission
Department of Land Utilization

DEPARTMENT OF GENERAL PLANNING
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET
HONOLULU, HAWAII 96813

ENVIRONMENTAL
COMMUNICATIONS
INC.

FRANK F. FASI
MAJOR



ROBERT R. WAY
CHIEF PLANNING OFFICER

F. J. RODRIGUEZ
PRESIDENT

August 25, 1977

DGP7/77-1980 (JB)

August 2, 1977

Mr. F. J. Rodriguez, President
Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Mr. Robert R. Way
Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Way:

Thank you for your letter dated August 2, 1977 on the Environmental Impact Statement for the proposed Waikiki Tennis-Commercial Building. Your comments on the designated land uses have been duly noted.

XIII-11

Dear Mr. Rodriguez:

Waikiki Tennis-Commercial Building
Environmental Impact Statement

In reference to the above-captioned, we have the following comments to offer.

Under the Development Plan (DP) for the Waikiki-Diamond Head (Section "A") area adopted by Ordinance No. 3167, the proposed tennis complex and commercial building is within an area designated for Off-Street Parking use. However, under the Comprehensive Zoning Code of the City and County of Honolulu, the properties programmed for the proposed development are zoned Resort Commercial, which allows commercial recreation facilities.

We appreciate the opportunity to participate in the review process.

Sincerely,


ROBERT R. WAY
Chief Planning Officer

RRW:fmt

cc: Dept. of Land Utilization

Thank you for your continuing interest.

Very truly yours,



F. J. Rodriguez

cc: S & M Partners
Boone & Associates, Inc.
Environmental Quality Commission
Department of Land Utilization

R

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET
HONOLULU, HAWAII 96813
PHONE 873-1161

FRANK P. FARI
MAYOR
RICHARD K. SHARPLESS
MANAGING DIRECTOR



WILLIAM BLACKFIELD
DIRECTOR
TYRONE T. KUSAO
DEPUTY DIRECTOR

BOARD OF WATER SUPPLY
CITY AND COUNTY OF HONOLULU

COPY

August 5, 1977

August 3, 1977

TO: MR. GEORGE MORIGUCHI
DIRECTOR
DEPARTMENT OF LAND UTILIZATION

FROM: EDWARD Y. HIRATA
MANAGER AND CHIEF ENGINEER
BOARD OF WATER SUPPLY

SUBJECT: ENVIRONMENTAL IMPACT STATEMENT
WAIKIKI TENNIS-COMMERCIAL BUILDING
WAIKIKI, OAHU, HAWAII

Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Gentlemen:

Re: Waikiki Tennis-Commercial Building
Environmental Impact Statement

We have reviewed the subject Environmental Impact Statement and have no objections to the project.

The copy of the EIS forwarded to us is being returned to the Environmental Quality Commission.

Sincerely,

TYRONE T. KUSAO
Director

cc: Environmental Quality Commission

We have no objections to the proposed project. However, we request that the construction plans be submitted for our review and approval.

Please call Lawrence Whang at 548-5221 if further information is needed.

EDWARD Y. HIRATA
Manager and Chief Engineer

cc: Environmental Communications, Inc.

1. We note that the EIS Preparation Notice was prepared by this office. Table 20 on page X-3 seems to imply that this office did not respond to a request for comments during the consultation period. It would be appropriate to note that representatives of this office met with the developer/applicant prior to the first draft of the EIS to discuss the proposed action. The major concern related to the appropriateness of the design of the proposed structure on this corner and its compatibility with surrounding uses and structures. None of the design considerations suggested by our staff were incorporated into the proposed action. No alternative design has apparently been considered.

2. Reference: Figures 5 & 6, Property Lines

Comment: Property lines do not agree. Which is the correct figure?

3. Reference: Page I-1. How was the total lot size of 57,359.2 square feet arrived at?

Comment: Our subdivision file No. 76(256) creating five lots shows the lot area to be 45,852 square feet. There appears to be a discrepancy in lot area and property lines. This should be clarified.

4. Reference: Page I-4. "...existing public and private tennis courts have poor accessibility..."

Comment: Where is the supportive documentation for this statement?

5. Reference: Page I-8, Landscaping Concept

Comment: Since landscaping is considered a prime consideration in the design, it would be appropriate to include the landscaping plan on page E-2 of Appendix E which shows the street level plan of the proposed structure.

6. Reference: Page II-5, Adjacent Uses

Comment: It would be appropriate to include in the text a map showing the adjacent uses and the actual heights of the surrounding structures.

7. Reference: Pages II-2 & II-3, Photos showing existing conditions.

Comment: It would be appropriate to show a third photo which would superimpose the proposed structure from these views.

8. Reference: Duke Lane

Comment: We are aware that Duke Lane is planned for improvement by the abutting owners. What, if any, possibility is there in interrelating the design of the commercial uses with plans to improve Duke Lane?

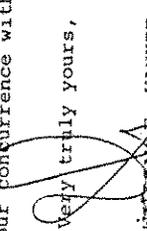
Also, the corner at Duke Lane and Kuhio Avenue is shown on the Waikiki Special Design District Circulation Plan as a mini-park. This should be included in the design of the landscape plan.

9. Reference: Page III-55, Parking "...Approximately 300 parking spaces will be provided, more than required by the CZC."

Comment: What is the justification for exceeding the CZC requirement? In the next paragraph it is stated that there is a trend toward fewer and smaller cars. The energy crisis and the increased availability and use of public transportation would seem to indicate that there would be less justification for more parking.

We have no comments on some of the more technical aspects of the project, but this does not imply our concurrence with the analysis or conclusions drawn therefrom.

Very truly yours,


WILEKANE WANKET
Acting Director

NEW:ey

R

Mr. George Moriguchi
September 1, 1977
Page Two

ENVIRONMENTAL
COMMUNICATIONS
INC.

September 1, 1977

Mr. George Moriguchi, Director
Department of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Moriguchi:

Thank you for your letter of August 22, 1977 on the Environmental Impact Statement for the proposed Waikiki Tennis-Commercial Building. The comments raised in the letter were reviewed by both the applicant, S & M Partners, Inc., and Boone & Associates, Inc., the design architect in charge. Apart from the specific items referenced on lot size, property lines, and the excess parking being provided, the discussion in your letter dwelled extensively in the area of design compatibility.

We share the concerns of your department that the visual impact of the building with the surrounding area can be significant. In the development of the current design, the applicants explored various mixes of land use that would prove both economically viable and least damaging to the adjacent environment. The determined building mix provides what can be described as a unique combination of recreational, office, and commercial uses within a resort area. On this basis, compliance has been met to offer the least environmentally damaging use of the subject parcel.

Please be assured that in the development of the present building design, the architect worked on several design alternatives before the applicant approved what has been presented as the current building design. It should be pointed out that due to the relatively unique mixed use of recreational, office, and commercial spaces, the tennis floors have ceiling heights of thirty-five feet which need to utilize natural ventilation as much as possible. It is also felt that the present design is not necessarily the final design which would be accepted and that in the formal WSDD review process, positive communication between design branch staff and the architect can effectively be accomplished to achieve the desired design that will satisfy the requirements of the WSDD.

The balance of the specific items numbered 1-9 are covered in the following:

1. Table 20 on page X-3 will be corrected to reflect that DLJ need not have commented on the EIS Determination Notice which they prepared. The meeting cited which provided several design considerations is acknowledged and the architect is prepared to discuss the various design factors suggested by staff.

2. Property lines as noted in the EIS will be corrected. The drafting of Figure 5 will be redone to reflect the correct property lines.
3. The stated square foot total of 57,364 s.f. is provided and corroborated by the applicant's legal counsel in the attached letter, dated August 25, 1977.
4. The reference to page I-4 "...existing public and private tennis courts have poor accessibility..." is supported in the EIS on pages III-33 to 38 as provided in a report prepared by Robert N. Anderson, Ph.D., June, 1977.
5. Reference page I-8, Landscaping Concept. The landscape plan which has been completed will be provided as an attachment to this response and will also be included in the Final EIS as an exhibit. We also understand that the WSDD review process will include a rigorous review of this aspect of the total design.
6. The discussion on adjacent land uses and the actual heights of the buildings is covered extensively on pages III-61, 62, 63, 64, and 65. While a map is not used, two photographs and extensive narrative descriptions provide the reader with an adequate disclosure of the impact on scenic views and view planes.
7. The photographs on pages II-2 & II-3 were shown to provide the reader with an idea of the existing site as it is today. Often-times these are not provided and it was felt that these two pictures would prove helpful. The suggestion that the proposed building be superimposed from these view points is better handled with the photographs on pages III-62 & III-63.
8. Discussions with the present owners of the abutting properties on Duke Lane have not realized any significant decisions as to their ultimate plans for future land use on their respective parcels. The cited corner at Duke Lane and Kuhio Avenue as referenced in the WSDD Circulation Plan as a mini-park is included in the landscape plan submitted as an attachment to this letter.
9. Reference page III-55, Parking "...approximately 300 parking spaces will be provided, more than required by the CZC." The justification for providing more spaces than required by the CZC is based on the design concept that to meet the CZC requirement would have meant that less than a full floor would have had to be built. It was easier to go to the next full floor and exceed the code requirement than build half a floor. Also, the evening traffic patterns currently in practice, can make full use of the surplus parking spaces.

These responses are offered to meet the comments made in the department's review of the proposed project. We realize that those comments dwelling

R

Mr. Fred Rodriguez
August 25, 1977
Page two

Owner	TCT	Lot	Map	Land Court Consol. No.	Area (Sq. Ft.)
Stanley Frank Gillmar and Jack Notley Scudder Gillmar	192,050	3	1	140	6,204.0
The Queen's Medical Center	192,051	4	1	140	21,786.0
Owner	TCT	Lot	Map	Land Court App. No.	Area (Sq. Ft.)
The Queen's Medical Center	47,714	24	17	324	11,428.0
Hawaiian Electric Company, Inc.	10,886	128-A	15	551	36.0
					<u>57,364.0</u>

Lots 1, 2 and 3 have been leased by the Gillmars to S & M Partners by Lease, dated July 15, 1977, and filed in the Office of the Assistant Registrar of the Land Court of the State of Hawaii as Document No. 826117. The foregoing areas for Lots 1, 2 and 3 are as shown on Exhibit "A" to the foregoing Lease. Lots 4 and 24 were leased by The Queen's Medical Center to S & M Partners by Lease, dated July 15, 1977, filed in said Office of the Assistant Registrar of the Land Court as Document No. 826120. The foregoing areas for Lots 4 and 24 are as shown on Exhibit "A" to the foregoing Lease. Section 17.01 of each of the foregoing leases provides for the consolidation of those parcels for building purposes.

The Hawaiian Electric Company, Inc., the Gillmars, S & M Partners and others have entered into an Exchange Agreement, dated July 11, 1977, pursuant to which Hawaiian Electric Company, Inc. will convey Lot 128-A to Ruth Dorothy Gillmar, the owner of Lot 2 above, and receive in exchange a perpetual easement over Lot 1 above. The foregoing Exchange Agreement has been executed by all parties, and Hawaiian Electric Company, Inc. is in the process of obtaining the approval of the Public Utilities Commission to the exchange. In addition, the Gillmars, The Queen's Medical Center and S & M Partners have also entered into an Agreement, dated July 15, 1977, pursuant to which the Gillmars

Mr. Fred Rodriguez
August 25, 1977
Page three

have agreed that, upon conveyance of Lot 128-A to Ruth Dorothy Gillmar, the foregoing Lease from the Gillmars to S & M Partners will be amended to include Lot 128-A as part of the demised premises, at no additional rental.

Based upon the foregoing, it appears that the total area of the development parcels will be 57,364.0 square feet.

If you have any further questions, please contact me.

Yours very truly,

CARLSMITH, CARLSMITH,
WICHMAN AND CASE

John F. Lezak
John F. Lezak

JFL:elc
xc: Bruce C. Stark

R

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

HONOLULU MUNICIPAL BUILDING
650 SOUTH KING STREET
HONOLULU, HAWAII 96813



FRANK E. FISH
MAYOR

F. J. RODRIGUEZ
PRESIDENT

ENVIRONMENTAL
COMMUNICATIONS
INC.

August 26, 1977

KAZU HAYASHIDA
DIRECTOR

TE7777-3213
TE7777-3240

AUG 22 1977

Environmental Quality Commission
100 Halekuanila St., Room 301
Honolulu, Hawaii 96813

Gentlemen:

Environmental Impact Statement for Waikiki
Tennis Building

We have reviewed the Environmental Impact Statement as submitted on July 19, 1977 and offer the following comments:

1. The Traffic Impact Study should include Seaside Avenue.
2. The major Waikiki by-pass route should be checked with the State Department of Transportation to see if it is their future plan or not.
3. The General Plan must be amended as it now shows the area designed as off-street parking.

Very truly yours,

KAZU HAYASHIDA
Director

cc: DLU
Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Mr. Kazu Hayashida, Director
Department of Transportation
Services
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Hayashida:

Thank you for your letter dated August 22, 1977 on the Environmental Impact Statement for the proposed Waikiki Tennis-Commercial Building. Your comments were reviewed with the architect in charge, Boone & Associates, Inc., and they have provided us with the following:

1. Seaside Avenue is included in the Traffic Impact Study analysis.
2. The State Department of Transportation has commented on the current status of the major by-pass route through Waikiki and it does not seem that at the present time, our project will be impacted by this future consideration.
3. The Department of General Planning commented on this aspect of the designated off-street parking.

Thank you for your continuing interest.

Very truly yours,

F. J. Rodriguez

cc: S & M Partners
Boone & Associates, Inc.
Environmental Quality Commission
Department of Land Utilization

R



STATE OF HAWAII
DEPARTMENT OF AGRICULTURE
1428 SO. KING STREET
HONOLULU, HAWAII 96814

July 25, 1977

JOHN FARIAS, JR.
CHAIRMAN, BOARD OF AGRICULTURE
YUSUO KITAGAWA
DEPUTY TO THE CHAIRMAN

BOARD MEMBERS:

- IRWIN M. HIGASHI
MEMBER - AT - LARGE
- ERNEST F. MORGADO
MEMBER - AT - LARGE
- KALFRED K. YEE
MEMBER - AT - LARGE
- SHIZUTO KADOTA
HAWAII MEMBER
- STEPHEN D. LAU
MAUI MEMBER
- FRED M. OGASAWARA
MAUI MEMBER

MEMORANDUM

To: Environmental Quality Commission

Subject: EIS - Waikiki Tennis-Commercial Building
TKK: 2-6-22: 04, 05, etc.

The Department of Agriculture has no comments on this environmental impact statement.

The document is herewith returned for further use.

We appreciate the opportunity to comment.

George B. Arnold
George B. Arnold, Jr.
Chairman, Board of Agriculture

Enc.



STATE OF HAWAII
DEPARTMENT OF EDUCATION
P. O. BOX 5280
HONOLULU, HAWAII 96804

OFFICE OF BUSINESS SERVICES

July 25, 1977

Department of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Gentlemen:

Subject: Waikiki Tennis-Commercial Building
Environment Impact Statement (EIS)

Thank you for providing us a copy of the subject Environmental Impact Statement (EIS). The Department of Education has no comment.

Sincerely,

Kiichi H. Yokushice
KIICHI H. YOKUSHICE
Assistant Superintendent
Office of Business Services
KHJ:JEE:YK

cc: Environmental Communications, Inc.

GEORGE H. ABRAHAM
GOVERNOR



VALENTINE A. SELESMANN
MAJOR GENERAL
ADJUTANT GENERAL

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE ADJUTANT GENERAL
FORT RUGER, HONOLULU, HAWAII 96816

HIENG

26 JUL 1977

Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Gentlemen:

Waikiki Tennis-Commercial Building

Thank you for sending us a copy of the "Waikiki Tennis-Commercial Building" Environmental Impact Statement. We have received the publication and have no comments to offer.

Yours truly,

WAYNE R. TOMOYASU
Captain, CE, HARNG
Contr & Engr Officer

ANDREW I. T. CHANG
DIRECTOR OF SOCIAL SERVICES & HOUSING



STATE OF HAWAII
DEPARTMENT OF SOCIAL SERVICES AND HOUSING
P. O. Box 339
Honolulu, Hawaii 96809

July 29, 1977

MEMORANDUM

TO: Environmental Quality Commission
550 Halekaunila St., Room 301
Honolulu, Hawaii 96813

FROM: Andrew I. T. Chang, Director
Department of Social Services and Housing

SUBJECT: Waikiki Tennis-Commercial Building, Waikiki, Oahu, Hawaii
Environmental Impact Statement

Subject EIS has been reviewed for its affect on departmental programs.
We have no comment to make regarding this project.
We are returning the EIS for your usage.
Thank you for the opportunity to review and comment.

Andrew I. T. Chang
DIRECTOR

Attachment
cc: (Mayor) Dept. of Land Utilization
Environmental Communications, Inc.

SCOTT R. ARIYOSHI
DIRECTOR

CHRISTOPHER COBB, CHAIRMAN
BOARD OF LAND & NATURAL RESOURCES
EDGAR A. HAMASU
DEPUTY TO THE CHAIRMAN

DIVISIONS:
CONSERVATION
FISH AND GAME
FORESTRY
LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
P. O. BOX 621
HONOLULU, HAWAII 96809

July 28, 1977

*EQC
Gov. office
550 Halekaunila St.
RM 301 96813*

(Mayor) Department of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Sir:

Subject: Waikiki Tennis-Commercial Building
Waikiki, Oahu Island

Thank you for the opportunity to comment on the
final EIS for the subject undertaking.

The proposed undertaking will have no effect upon
any known historic or archaeological site on or likely to
be eligible for inclusion to the Hawaii and/or National
Registers of Historic Places.

In the event that any unanticipated sites or
remains are encountered, please contact this office
immediately.

Sincerely yours,

Jane L. Silverman
Jane L. Silverman
Historic Preservation Officer
State of Hawaii

cc: Environmental Communications, Inc.
Box 536, Honolulu 96809

R

GEORGE R. ARIYOSHI
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF STATE PARKS
P. O. BOX 521
HONOLULU, HAWAII 96809

DIVISIONS:
CONVEYANCES
FISH AND GAME
LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT

FILE NO. _____

August 2, 1977

Dept. of Land Utilization
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Sir:

The Waikiki Tennis-Commercial Building is outside our general area of interest and responsibility and should have no impact on our State Park program. Therefore, we have no comments on the proposed project.

Very truly yours,

J. M. Souza Jr.
State Parks Administrator
Division of State Parks

cc: Environmental Communications, Inc.

GEORGE R. ARIYOSHI
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3078
HONOLULU, HAWAII 96801

August 12, 1977

MEMORANDUM

To: Environmental Quality Commission
Office of the Governor

From: Deputy Director for Environmental Health

Subject: Environmental Impact Statement (EIS) for the Proposed Waikiki Tennis-Commercial Building

Thank you for allowing us to review and comment on the subject EIS.

We submit the following comments for your consideration:

Air

1. We agree with the methodology and results as they relate to the estimated ambient CO concentration levels.
2. The air quality analysis estimates that without the project, existing as well as future CO air quality levels can be expected to exceed SAAQS. This analysis also indicates that the proposed project will contribute toward even higher CO air quality concentration levels, although, its contribution will be small. This analysis demonstrates the need for a comprehensive air quality monitoring and is difficult to evaluate projects in the Waikiki area.

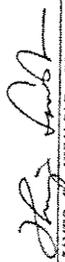
Noise

1. Construction activities must comply with Public Health Regulations, Chapter 44B, Community Noise Control for Oahu.
 - a. An application for Community Noise Permit must be filed and approved by the Department of Health.
 - b. Construction activities must comply with the provisions of the conditional use of permit as stated in Public Health Regulations, Chapter 44B and the conditions of the permit.

August 12, 1977

- 2. All heavy vehicles travelling on the trafficway to and from the construction project must comply to the limits stated in Public Health Regulations, Chapter 44A, Vehicular Noise Control for Oahu.
- 3. Noise emitted by mechanical ventilation equipment and systems must be attenuated to comply with Public Health Regulations, Chapter 44B.
- 4. We concur with the conclusions and recommendations of Ronald Darby and Associates.

We realize that the statements are general in nature due to preliminary plans being the sole source of discussion. We, therefore, reserve the right to impose future environmental restrictions on the project at the time final plans are submitted to this office for review.


 JCR. JAMES S. KUMAGAI, Ph.D.

cc: Dept. of Land Utilization
 Environmental Communications, Inc. ✓

ENVIRONMENTAL
 COMMUNICATIONS
 INC.

August 25, 1977

F. J. RODRIGUEZ,
 PRESIDENT

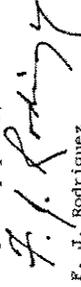
Dr. James S. Kumagai
 Deputy Director for
 Environmental Health
 Department of Health
 P. O. Box 3378
 Honolulu, Hawaii 96801

Dear Dr. Kumagai:

Thank you for your prompt response and comments on the Environmental Impact Statement for the proposed Waikiki Tennis-Commercial Building. The two subjects delineated in your memorandum of August 12, 1977 have been duly noted and the applicant will comply with the various permit requirements as indicated in the section on noise.

Thank you again for your prompt response.

Very truly yours,



F. J. Rodriguez

cc: S & M Partners
 Econe & Associates, Inc.
 Environmental Quality Commission
 Department of Land Utilization

GEORGE R. ARIYOSHI
GOVERNOR



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

August 15, 1977

Environmental Quality Commission
550 Halekauwila St., Room 301
Honolulu, Hawaii 96813

Gentlemen:

Subject: Environmental Impact Statement
Waikiki Tennis-Commercial Building

Thank you for giving us the opportunity to review the above-captioned document.

In reference to the Waikiki by-pass route, page III-51, lines 10-12, there has been a move on the part of the City Department of General Planning to delete it from the DLUH. The City Planning Commission, however, recommended that the Waikiki By-pass be retained until further studies have been conducted by the appropriate City and State agencies to determine the location, size, and type of highway configuration that are required to alleviate existing traffic congestion and that these needed comprehensive traffic and transportation plans then be incorporated into the development plan for this area.

The Department of Transportation, in cooperation with the City Department of Transportation Services, is examining a makai, High Occupancy Vehicle (HOV), travelway which closely follows the makai by-pass alignment. A Joint City/State/Federal concurrence of this alignment could well serve as the fixed guideway route for the Honolulu urbanized area, and providing the necessary vehicle capacity for this transportation corridor.

Sincerely,

E. Alvey Wright
E. ALVEY WRIGHT
Director

F. ALVEY WRIGHT
DIRECTOR

DEPUTY DIRECTORS
WALLACE A. OBI
RICHARD W. MCKAY
DOUGLAS W. MCKAY
CHARLES D. SWANSON

IN REPLY REFER TO

STP 8.4414

ENVIRONMENTAL
COMMUNICATIONS
INC.

August 25, 1977

F. J. RODRIGUEZ,
PRESIDENT

Admiral E. Alvey Wright, Director
Department of Transportation
869 Punchbowl Street
Honolulu, Hawaii 96813

Dear Admiral Wright:

Thank you for your letter of August 15, 1977 (STP 8.4414) commenting on the Environmental Impact Statement for the proposed Waikiki Tennis-Commercial Building project.

Your comments were reviewed by the project's traffic consultant, Mr. Henry T. Au. Mr. Au has prepared the following disposition to your comments:

"Since the Environmental Impact Statement was prepared on the basis of the existing alignment, the revised alignment will be an improvement over the existing alignment and should further mitigate in the future, the adverse consequences of traffic and improve considerably the traffic flow on the highway and street systems of the Waikiki district. Therefore, the revised alignment will better serve the Waikiki district and provide more than sufficient vehicle capacity for this transportation corridor."

Very truly yours,

F. J. Rodriguez

F. J. Rodriguez

cc: S & M Partners
Boone & Associates, Inc.
Environmental Quality Commission
Department of Land Utilization

R

STATE OF HAWAII
DEPARTMENT OF PLANNING AND
ECONOMIC DEVELOPMENT
P. O. Box 2359
Honolulu, Hawaii 96804

August 16, 1977

Ref. No. 4290

Mr. George Moriguchi, Director
Department of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Moriguchi:

Subject: Environmental Impact Statement for the Proposed Waikiki
Tennis-Commercial Building

We have reviewed the subject EIS and have found that, in general,
the major environmental impacts which can be anticipated to result from the
proposed project have been adequately assessed.

We suggest, however, that the summary description of the facilities
contained in the middle of page 1 be clarified and worded in a more logical
sequence. Our understanding of the section is that there will be an eleven-
story structure and a roof level which will accommodate four tennis courts.

We have no further comments to offer at this time but appreciate
the opportunity to review and comment on this environmental impact statement.

Sincerely,



HIDEITO KONO

cc: Environmental Communications Inc. ✓
P.O. Box 536
Honolulu, Hawaii 96809

ENVIRONMENTAL
COMMUNICATIONS
INC.

August 25, 1977

F. J. RODRIGUEZ,
PRESIDENT

Mr. Hideto Kono, Director
Department of Planning and
Economic Development
P. O. Box 2359
Honolulu, Hawaii 96804

Dear Mr. Kono:

Thank you for your letter dated August 16, 1977 on the Environmental
Impact Statement for the proposed Waikiki Tennis-Commercial Building.
Your request for clarification of the summary description of the
facilities contained on page 1 will be complied with to clear up the
apparent confusion on floor count.

Thank you for your continuing interest.

Very truly yours,



F. J. Rodriguez

cc: S & M Partners
Boone & Associates, Inc.
Environmental Quality Commission
Department of Land Utilization

shall attach such analyses, or summaries thereof, ... These two necessary corrections result from a typing error in the published version of the EIS regulations.

For your information we have attached copies of the comments received by this Office as shown on the attached list.

Sincerely,

/s/ Richard E. Marland
Richard E. Marland
Director

Attachments

cc: Environmental Communications, Inc. w/attachment

RICHARD E. MARLAND, Ph.D.
DIRECTOR

TELEPHONE NO.
540-8913



STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
OFFICE OF THE GOVERNOR
550 HALEKUA/OWA ST.
ROOM 301
HONOLULU, HAWAII 96813

August 22, 1977

George Moriguchi, Director
Department of Land Utilization
City and County of Honolulu
Honolulu, Hawaii 96813

SUBJECT: Environmental Impact Statement for the proposed Waikiki
Tennis-Commercial Building

Dear Mr. Moriguchi:

Thank you for allowing us to review and comment on the subject EIS. To date, we have received twelve (12) comments on this EIS. We offer the following comments for your consideration:

- The noise impacts associated with the demolition of the Seaside Surf Hotel and the construction of the proposed project are not discussed under Impact on Noise (p. iii-11). This should be discussed even though the noise mitigation requirements of Chapter 44B, Community Noise Control for Oahu will have to be followed. How will the present hotel on the site be demolished?
- Environmental Protection Policies. The statement about Chapter 341 creating the Environmental Quality Commission is incorrect. The Governor's Environmental Council and the U.H. Environmental Center, along with this Office, were created by Chapter 341. Also, Chapter 342, H.R.S. does apply to this project because the Public Health Regulations established under that Chapter will have to be adhered to by the developer.
- Corrections should be made to the quotations of the EIS Regulations as shown as sections VI and IX of the EIS. Section VI should include in the first sentence the following corrections: "...trade-offs between short-term environmental gains at the expense of long-term losses, or vice versa..." Also, this is Sub-Part E., 1.42 Content Requirements, h (not d). Section IX should include the following correction to the last sentence: "...applicants that prepare cost-benefit analyses of proposed actions

List of commentors on the EIS for Waikiki Tennis-Commercial Building

State Agencies:

Dept. of Agriculture
Dept. of Land and Natural Resources
Dept. of Health
Dept. of Social Services and Housing
State Historic Preservation Officer

Date of comment

7-25-77
8-2-77
8-12-77
7-29-77
7-28-77

Federal Agencies:

U.S. Fish and Wildlife Service
Soil Conservation Service
U.S. ARMY - DAFB
U.S. Coast Guard

- -
7-22-77
7-28-77
7-27-77
7-29-77

City and County of Honolulu Agencies:

Dept. of Parks and Recreation
Dept. of Housing and Community Development

8-2-77
8-3-77

Others:

American Lung Association of Hawaii

7-25-77

GEORGE R. ARYOSHI
CONTINUED



RICHARD E. MARLAND, PH.D.
DIRECTOR
TELEPHONE NO.
548-8715

STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
OFFICE OF THE GOVERNOR
550 HALEKUA ST.
ROOM 301
HONOLULU HAWAII 96813

August 24, 1977

George S. Moriguchi, Director
Department of Land Utilization
City and County of Honolulu
Honolulu, Hawaii 96813

SUBJECT: Environmental Impact Statement for the Proposed Waikiki
Tennis-Commercial Building

Dear Mr. Moriguchi:

Please find attached comments made by the Department of Transporta-
tion on the subject EIS. Please append this correspondence to our
comments of August 22, 1977.

Sincerely,

Richard E. Marland
Richard E. Marland
Director

Attachment

cc: Environmental Communications, Inc.

ENVIRONMENTAL
COMMUNICATIONS
INC.

August 30, 1977

Dr. Richard E. Marland, Director
Office of Environmental Quality
Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Dr. Marland:

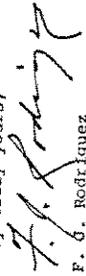
We have received and reviewed your letter of August 22, 1977 regarding the Environmental Impact Statement for the proposed Waikiki Tennis-Commercial Building. We would like to provide the following dispositions for your three items:

1. The noise associated with the demolition of the building will be evident for a very short period. (Normally the demolition and clearing away of the building takes place within one work week.) It is anticipated that the hotel on the site will be demolished by conventional methods, i.e. bulldozer or wrecking ball.
We will include discussion on the construction-related noise in the EIS under the appropriate section.
2. Environmental Protection Policies. The reference to Chapter 343 will be corrected to read that "Chapter 343 establishes the Governor's Environmental Council, University of Hawaii Environmental Center, and the Office of Environmental Quality Control". Additionally, in referring to Chapter 342, HRS, we will indicate that Public Health Regulations established under that chapter must be adhered to by the developer.

3. Please note that in quoting the narrative of these subsections of the EIS Regulations, we were unaware that it was incorrect. Therefore, we appreciate your revisions and will note them in those subsections.

We hope that these measures have adequately addressed your office's concerns.

Very truly yours,


F. D. Rodriguez

cc: S & M Partners
Boone & Associates, Inc.
Environmental Quality Commission
Department of Land Utilization

225 QUEEN STREET • P. O. BOX 536

HONOLULU, HAWAII 96809

TELEPHONE (808) 521-8391

UNIVERSITY OF HAWAII

Water Resources Research Center

Office of the Director

August 11, 1977

Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

Dear Sirs:

Subject: Environmental Impact Statement, Waikiki Tennis -
Commercial Building

We have reviewed the above EIS and have no critical comment.
We appreciate the opportunity to participate in this EIS review.

Sincerely,


Reginald H. F. Young
Asst. Director, WRRRC

RHFY:jmn



DEPARTMENT OF THE ARMY
HEADQUARTERS UNITED STATES ARMY SUPPORT COMMAND, HAWAII
APO SAN FRANCISCO 96558

AFZV-FE-EE

27 JUL 1977

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Division of Ecological Services
300 Ala Moana Blvd., Rm. 5382
P. O. Box 50167
Honolulu, Hawaii 96850



Reference: ES

July 22, 1977

State of Hawaii
Environmental Quality Commission
550 Halekauwila Street, Rm. 301
Honolulu, Hawaii 96813

Re: Environmental Impact Statement
Waikiki Tennis-Commercial Building
Waikiki, Oahu, Hawaii

Dear Sir:

We have reviewed the referenced Environmental Impact Statement dated July 1977 concerning the construction of a building in the Waikiki area.

This facility will have little, if any, significant impacts on fish and wildlife resources that are under the jurisdiction of this Service. Therefore, we have no additional comments to offer.

We are returning the Environmental Impact Statement as requested.

Thank you for this opportunity to comment.

Sincerely yours,

Maurice H. Taylor
Maurice H. Taylor
Field Supervisor

cc: HA
ARD(AE)
✓ Environmental Communications, Inc.
Department of Land Utilization, C&C of Honolulu



Save Energy and You Serve America!

Office of the Governor

State of Hawaii
Environmental Quality Commission
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Gentlemen:

Thank you for the opportunity to review the inclosed Environmental Impact Statement for the Waikiki Tennis-Commercial Building, Waikiki, Oahu, Hawaii. A review has been conducted and there are no comments. The document is returned as requested.

Sincerely,

Carl P. Rudolph
CARL P. RUDOLPH
Colonel, CE
Director of Facilities Engineering

1 incl
As stated

Copies furnished: (wo incl)
Dept. of Land Utilization
C&C of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Environmental Communications, Inc.
P. O. Box 536
Honolulu, Hawaii 96809

UNITED STATES DEPARTMENT OF AGRICULTURE

SOIL CONSERVATION SERVICE

P. O. Box 50004, Honolulu, HI 96850

July 28, 1977

Mr. George Moriguchi
Director, Department of
Land Utilization
650 South King Street
Honolulu, Hawaii 96813

DEPT OF LAND UTILIZATION
OFFICE OF THE GOVERNOR
550 HALEKAUWIIA STREET
ROOM 301
HONOLULU, HAWAII 96813

Dear Mr. Moriguchi:

Subject: Waikiki Tennis-Commercial Building, Waikiki, Oahu
We have reviewed the above EIS and have no comments to offer.

Thank you for the opportunity to review this document.

Sincerely,

Jack P. Kanalz
Jack P. Kanalz
State Conservationist

cc: Environmental Communications, Inc.



DEPARTMENT OF TRANSPORTATION
UNITED STATES COAST GUARD

COMMANDER (mep)
Fourteenth Coast Guard District
Prince Kahanui Mole Federal Bldg.
300 Ala Moana Blvd.
Honolulu, Hawaii 96830

16452

20 JUL 1977

State of Hawaii
Environmental Quality Commission
Office of the Governor
550 Halekauwila Street
Room 301
Honolulu, Hawaii 96813

Gentlemen:

Staff review of the "Environmental Impact Statement for the Proposed Waikiki Tennis-Commercial Building" has been completed, and the Coast Guard has no comment to offer. The FIS is returned herewith as we have no further use for the document.

The opportunity to review and comment on the FIS is appreciated.

Sincerely,

J. V. Caffrey
J. V. CAFFREY
Chief of Staff

Encl: (1) FIS

Copy to:
Dept. of Land Utilization, City & County of Honolulu
Environmental Communications, Inc.
Commandant (G-DEP-7)

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 15th AIR BASE WING (PACAF)
APO SAN FRANCISCO 96363



DEPARTMENT OF THE ARMY
HONOLULU DISTRICT, CORPS OF ENGINEERS
BLDG. 209, FT. SHAFTER
APO SAN FRANCISCO 96398



11 AUG 1977

DEEE (Mr. Makashima, 4092158)
Environmental Impact Statement

FODED-PV

22 August 1977

(Mayor) Department of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Environmental Communications, Inc.
P.O. Box 536
Honolulu, Hawaii 96809

1. This headquarters has no comment to render relative to the Environmental Impact Statement, title: Waikiki Tennis-Commercial Building, Waikiki, Oahu, Hawaii.

2. We greatly appreciate your cooperative efforts in keeping the Air Force apprised of your development projects throughout the City and County of Honolulu and the opportunity to review the subject statement.

Robert O. K. Ching
ROBERT O. K. CHING
Chief, Engrg & Constr Div
Directorate of Civil Engrg

Cy to: Environmental Communications, Inc.

We received the Environmental Impact Statement (EIS) for the proposed Waikiki Tennis-Commercial Building on 21 July 1977. We offer the following comments:

- a. To supplement our previous comments (letter dated 27 June 1977), the flood insurance study which will determine the 100-year flood elevation in the project area is tentatively scheduled to be completed in Fiscal Year 1978. However, preliminary information is currently available and the floor elevation (7.5 feet, mean sea level datum) of the first floor of the planned building is approximately equal to the 100-year flood elevation.
- b. The economic effects of construction noise on the occupancy of adjacent hotels should be considered.
- c. The effect of stray tennis balls falling from the open-air, top-floor tennis courts (about 170 feet) should be considered.

Thank you for the opportunity to review the EIS.

Sincerely,
Am J. M. Cheung
KISUK CHEUNG
Chief, Engineering Division



ENVIRONMENTAL
COMMUNICATIONS
INC.

August 25, 1977

Mr. Kiusuk Cheung, Chief
Engineering Division
Department of the Army
Building 230, Fort Shafter
APO San Francisco 96358

Dear Mr. Cheung:

Thank you for your comments in your letter dated August 22, 1977 on the Environmental Impact Statement for the proposed Waikiki Tennis-Commercial Building. The comments raised in your letter have been reviewed by the applicant, S & M Partners, Inc., and Boone & Associates, the architect in charge.

1. The floor elevation of the first floor will reflect the concern over the 100-year flood elevation as determined by the flood insurance study.
2. The economic effects of the anticipated construction noise on the adjacent hotels have been evaluated in public hearings conducted by the Department of Health in determining acceptable levels of construction noise in an urban setting. All construction companies are required to employ all practicable means to mitigate noise impact on adjacent residential sectors. The actual economic impact of this specific project on the adjacent hotels has not been examined.
3. Consultation with existing tennis facilities that are comparable in nature (roof top courts), advise that the effect of stray tennis ball falling from mid-air has been primarily an economic one; i.e. the loss of the tennis balls to passing pedestrians. No one to date has been injured by these tennis balls.

We hope that these responses satisfactorily address your department's concerns. Thank you for your continuing interest.

Very truly yours,


F. J. Rodriguez

cc: S & M Partners
Boone & Associates, Inc.
Environmental Quality Commission
Department of Land Utilization

AMERICAN LUNG ASSOCIATION of Hawaii

July 25, 1977

Department of Land Utilization
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Gentlemen:

Subject: Environmental Impact Statement for the Proposed
Waikiki Tennis-Commercial Building

We have reviewed those portions of the subject EIS which pertain to air quality impact and attached our comments.

Generally speaking, we found the analysis acceptable with the results offering a reasonable estimate of the project's impact on local air quality. Our principal comments pertained to proposed changes in federal motor vehicle emission standards and the conclusion that the project will be "environmentally responsible."

Sincerely yours,



James W. Morrow, Director
Environmental Health

Jwd:lp

cc: Dr. Richard E. Harland
Environmental Communications, Inc.



AMERICAN LUNG ASSOCIATION OF HAWAII

ENVIRONMENTAL IMPACT STATEMENT REVIEW

... an air quality assurance program

Waikiki Tennis-Commercial Building
July 25, 1977
Page 2

of standards violations. In such a case a project, though perhaps in-
significant by itself, would then be contributing to more violations.

Project: Waikiki Tennis-Commercial building Date: July 25, 1977

This seems to be the case with the Waikiki Tennis-Commercial Building. The carbon monoxide impact analysis indicates that violations of State and in some cases even Federal standards are possible without the project from 1978 up until 1995 when emission controls are assumed to effectively reduce emissions and thus ambient concentrations. With the proposed action, the probability of violations would be slightly increased. Further, and as noted in our previous comment, no action was made of the possible effect of less stringent standards currently being considered by Congress. If a given project is going to cause further degradation of air quality in an area which is already exceeding statutory standards, then one must certainly question whether such a project is "environmentally responsible."

1. Page III-7: The statement is made "...by 1995 CO emission controls on automobiles are expected to lower emissions from traffic at that time to values at or below allowable State limits."

While the above statement was certainly accurate in 1972, there is some question as to whether it remains valid at the present time. We make this comment because since the original statutory vehicle emission standards were promulgated, the attainment date for meeting those standards was changed in 1973, 1974, and 1975. The original standards which were to be met in 1975 model cars do not have to be met until 1978. Furthermore, Congress is presently deliberating on changing or delaying compliance with these standards determinous whether emissions and ambient concentrations in future years will decrease or increase with increasing traffic volumes. We recognize that because Congress has not yet come to a decision on this matter the impact of new standards or attainment dates could not be quantified. However, both Houses of Congress have recommended further delay, so there is no doubt that compliance will be put off. The only question is how long that delay will be. Considering the importance of this matter in estimating future traffic-related pollution, we believe the matter should have been at least mentioned in the EIS.

2. Page III-9: "Given that Waikiki Special Design District Plans already provide for a development of this nature and given that the worst case carbon monoxide concentrations produced by the additional traffic generated by the project are not likely to cause substantial changes in the expected air quality of the area, it seems reasonable to conclude that from an air pollution standpoint this building represents an environmentally-responsible addition to Waikiki's commercial area."

While we certainly agree that the project by itself will have only a minor impact on air quality, we feel obligated to question the validity of the above statement. It is premised on the belief that if a given project causes only a slight change in the "expected air quality of the area" then that project should be considered "environmentally responsible." We would have to dispute that reasoning in a case where the "expected air quality" without the project already shows possibilities

STATE OFFICE
Kukui St.
Honolulu, Hawaii 96813
Telephone 537-8866

HAWAII COUNTY
Post Office Box 935
Honolulu, Hawaii 96720
Telephone 835-1206

KAUAI COUNTY
Post Office Box 991
Lihue, Hawaii 96766
Telephone 245-4142

MAUI COUNTY
Cameron Center
Waialua, Hawaii 96793
Telephone 244-3110

R

Mr. James W. Morrow
September 2, 1977
Page Two

this urban desert isn't it environmentally responsible to stack the tennis courts on top of each other? The words "environmentally responsible" were meant to invoke comparisons to what other options might have wrought.

Thank you again for your comments. We hope that these dispositions adequately cover your concerns.

Very truly yours,
F. J. Rodriguez
F. J. Rodriguez

cc: S S M Partners
Roone & Associates, Inc.
Environmental Quality Commission
Department of Land Utilization

ENVIRONMENTAL
COMMUNICATIONS
INC.

September 2, 1977

Mr. James W. Morrow, Director
Environmental Health
American Lung Association of Hawaii
245 North Kukui Street
Honolulu, Hawaii 96817

Dear Mr. Morrow:

Thank you for your letter dated July 25, 1977 on the Environmental Impact Statement for the proposed Waikiki Tennis-Commercial Building. Although you have indicated that in general the air analysis provided was adequate, the air consultant, Mr. Barry Root, has reviewed your specific concerns and provides the following dispositions:

1. The 1995 emission factors used for this study are based on figures listed in Table D.7-1 of EPA's Compilation of Air Pollutant Emission Factors. This table shows 1990 estimates based on 1972 emission measurements and the assumption that stringent auto emission controls would be met by 1975 as mandated by the 1970 Clean Air Amendments. The 1975 standards have been delayed by Congress every year since 1975 and may be delayed until 1980 or later. For that reason the 1990 emission estimates presented in the EPA table were used in this study to represent forecast emissions for 1995 (i.e. a 5 year slippage of the achievement of stringent auto emission standards is assumed in the calculated air quality values presented). Given the Congressional inability to come to an environmentally responsible decision on this issue, EPA can hardly be faulted for not publishing timely updates of forecast auto emission factors for dates beyond 1990 and air pollution consultants are thus faced with either making their own guesses as to what auto emissions will be by more distant dates or using the only published values currently available. While the 5 year delay included in this study may slightly underestimate the number of years that strict standards may be put off the resulting air quality concentrations based on estimates of 1990 emissions are felt to be valid since coming fuel shortages and potential introduction of alternative forms of transport may substantially reduce the actual number of air pollution-producing vehicles in operation by 1995.

2. The words "environmentally responsible" were meant to imply - as compared to other types of buildings that could have been constructed within the allowable limits of the planning criteria for this commercial area. If tourists or Waikiki residents must now get into automobiles and drive all over town looking for an empty tennis court, isn't it environmentally responsible to provide them with tennis courts that they can walk to? If building more tennis courts side by side at ground level would substantially reduce the amount of remaining green space in

215 OUEEN STREET . P. O. BOX 536 . HONOLULU, HAWAII 96809 . TELEPHONE (808) 521-8391

Sewer Notes:

1. In the event that any changes in alignment or grade for the proposed sewer line are required due to any unforeseen conflict, the contractor shall verify the location and invert at his own expense and the engineer-in-charge or the maker of the plan shall be responsible for the required changes which are to be presented to the Division of Sewers for approval.
2. The contractor shall be responsible to maintain existing sewage flow conditions until final connection is made.
3. The contractor shall notify the Division of Sewers seven (7) days prior to commencement of sewer work.
4. Crush rock cradle is permitted. In areas of unstable soil, the maker of the plans and construction engineer will determine the pipe support required.
5. Construction of new sewer facilities shall commence at the lowest point. Cost of resolving construction problems resulting from commencing work from other than at the lowest point, unforeseen or otherwise, shall be paid for by the contractor.

Gas Notes:

1. The Gasco, Inc. gas pipe lines in the project area are plastic coated and cathodically protected. The contractor shall be extremely careful when working near these gas pipe lines.
2. The contractor shall call Gasco, Inc. a minimum of 48 hours before starting excavation to arrange for field location of all existing gas pipe lines. The telephone number is 548-2126 during business hours, and 548-2123 after hours.
3. For relocation of any gas pipe line, the contractor shall notify Gasco, Inc. five working days before starting work. The contractor shall provide the necessary excavation and backfill, arrange for traffic permits and restore sidewalk pavement or other facilities. Relocation of gas facilities shall be done by Gasco, Inc. and paid for by the contractor.
4. The contractor shall notify Gasco, Inc. immediately after any damage has been caused to existing gas pipe lines, their coating or their cathodic protection devices. Repair work on this damage shall be done by Gasco, Inc. with payment for this work to be borne by the contractor.
5. Minimum vertical or horizontal clearance between gas pipe lines and other pipelines, conduits, or ductlines shall be 12 inches. Adequate support and protection for gas pipe lines exposed in the trench shall be provided. Such support and protection shall be approved by Gasco, Inc.
6. The contractor shall work in an expeditious manner in order to keep uncovered gas pipe lines exposed for as short a period of time as possible.

Evaluation Research Consultants

Socioeconomic Planning

Project Evaluation

APPENDIX C

SOCIOECONOMIC IMPACT OF ALTERNATIVE TENANT MIX

MEMORANDUM

TO : Fred Rodriguez
Environmental Communications, Inc.

FROM: Robert N. Anderson *RA*

DATE: July 5, 1977

RE : A Third Alternative Tenant Mix for S&M Partners

It is my understanding that another alternative tenant mix is being considered for the proposed project by S & M Partners. This mix would involve: (1) rooftop tennis of 4 courts, (2) 58,000 square feet of retail commercial space, (3) 105,000 square feet of office space, and (4) parking for 486 vehicles.

Although we have not had direct access to the cost figures that would be involved, we question the financial viability of a smaller scale for the tennis operation, in and of itself. The desired support facilities involved would not be intensively used with only 4 courts, which would be inefficient use of the expensive real estate involved. In other words, essentially the same support facilities could serve 8 courts almost as readily as they could 4 courts. Consequently, from an investment point of view, we suspect that a more detailed financial study would show a marked advantage for one floor plus the rooftop to be used for

tennis, as opposed to having only 4 courts on the roof. Only if no major Waikiki hotel is willing to enter into an agreement for the semi-exclusive use of the facilities for their guests would the restriction to 4 courts be financially desirable.

If the decision is made to restrict the tennis facilities to 4 courts, it is our judgment that the impact will be negligible on the competing private facilities in Waikiki. Furthermore, such a cutback in space allocated to tennis use would mean the project would have far less impact on the private facilities on King Street. Indeed, we judge it unlikely that the financial survival of the King Street operation would be threatened by the proposed project, if its scope is thus lessened.

The only other difference in the socioeconomic impact of this third alternative is due to the increase in office space. As stated in reference to the other alternatives, we are unable, due to lack of data, to effectively analyze the impacts of new office space. Our observations, though not developed in detail, indicate that such space is presently difficult to rent at a rate that fully covers development costs, which suggests there is no scarcity of such space in Waikiki. However, office space with particularly attractive features, such as proximity to other activities and availability in large blocs, is seldom vacant in Waikiki.

APPENDIX D
EIS ASSESSMENT/DETERMINATION

Department of Land Utilization
77/WSDD-6(GN)
April 22, 1977

APR 28 1977

77/WSDD-6 (GN)

ORDINANCE NO. 4529 (INTERIM SHORELINE PROTECTION)
ENVIRONMENTAL IMPACT STATEMENT ASSESSMENT/DETERMINATION

Assessing Agent : Department of Land Utilization
Applicant : S & M Partners
Agent : Boone & Brooks, Inc.
Project Location: Waikiki
Tax Map Key : 2-6-22: 4, 5, 19, 20, 21, 22, por. 24,
25, 28, 31, 32 & 33
Request : Waikiki Development Conformance Certificate
File Number : 77/WSDD-6
Determination : EIS Required

Mr. Donald Brenner, Acting Chairman
Environmental Quality Commission
State of Hawaii
550 Halekuanila Street, Room 301
Honolulu, Hawaii 96814

Dear Mr. Brenner:

Environmental Impact Statement Assessment/Determination
Waikiki Special Design District, 77/WSDD-6
Waikiki Tennis - Commercial Building

In accordance with Chapter 343, HRS, we are notifying you of our intent to require an Environmental Impact Statement for the above. Attached is an EIS Preparation Notice.

By copy of this letter, we are also notifying the applicant's agents, Boone & Brooks, Inc., of our decision.

If you should have any questions or wish additional information, please contact Mr. Gary Noda of our staff at 523-4256.

Very truly yours,

George S. Mokuoguchi
GEORGE S. MOKUOGUCHI
Director

GSS:in
Attach.

cc: Boone & Brooks, Inc.

A. Proposed Action

The applicant, S & M Partners, proposes to construct an 11-story commercial complex on a 1.3 acre property situated on the mauka-Ewa corner of Kuhio Avenue and Seaside Avenue. The subject site is within the Waikiki Design District, Ordinance No. 4573.

i. Technical Characteristics

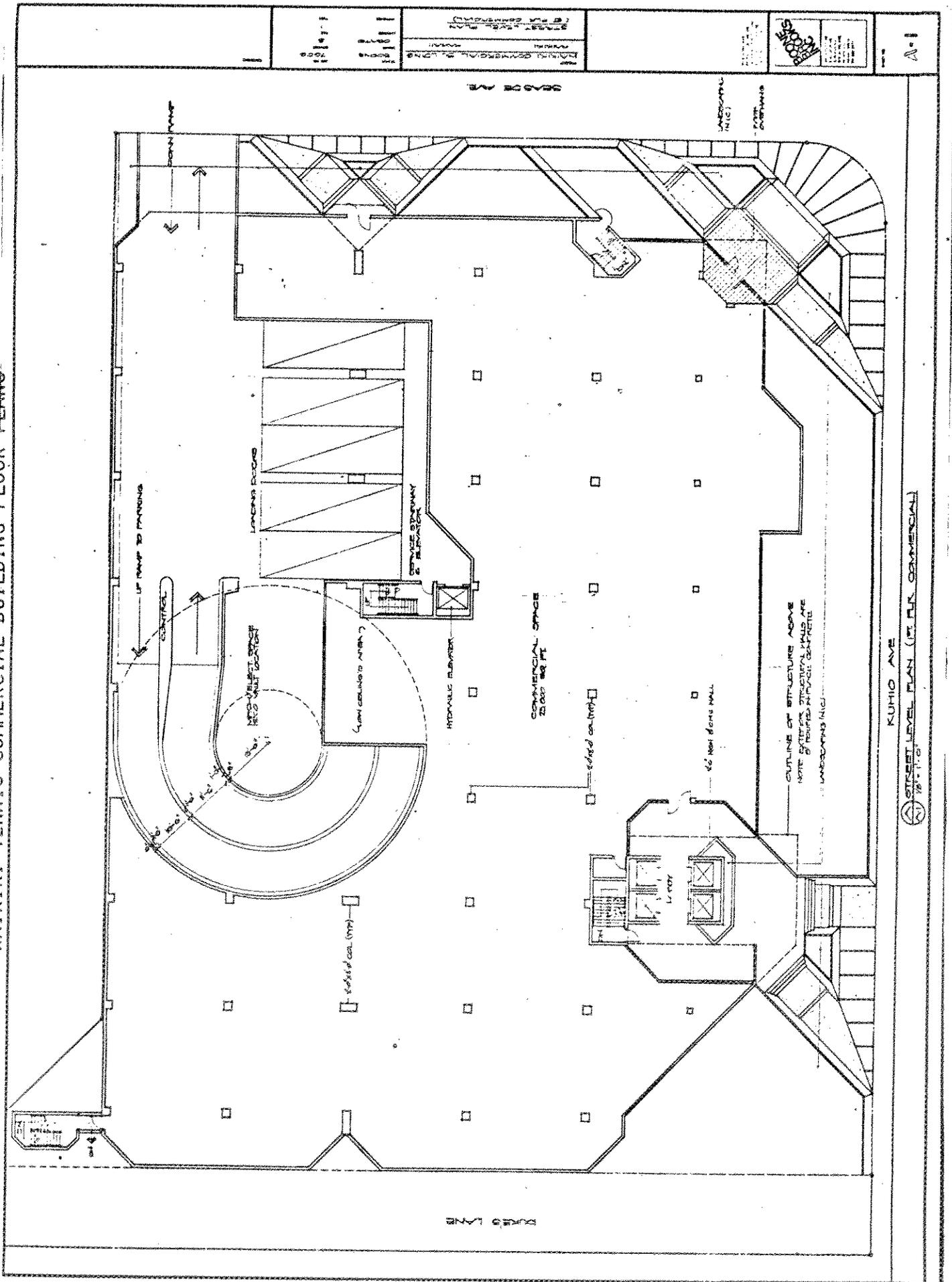
- a. The 11-story structure would consist of approximately 150,000 square feet of floor space.
 - (1) Two floors are designated for commercial space, (58,000 square feet).
 - (2) Office space totaling about 25,000 square feet.
 - (3) Two floors of indoor tennis, including roof top tennis and tennis support facilities, (67,000 square feet).
- b. The new building would have a maximum height of 185 feet.
- c. Parking facilities would accommodate about 276 vehicles.
- d. Open space would be landscaped and furnished with benches and walkways and other low profile landscaping elements.

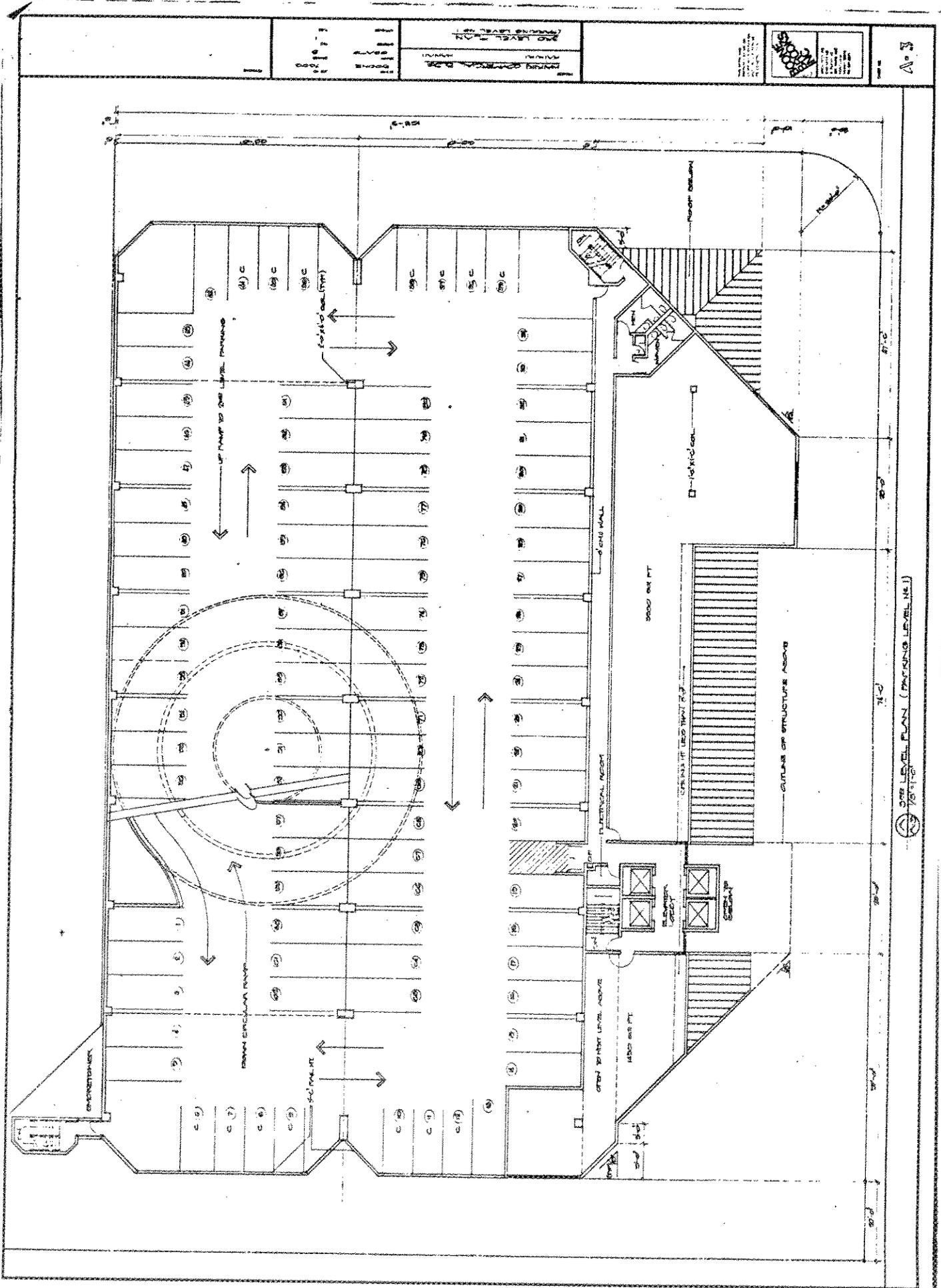
APPENDIX E
WAIKIKI TENNIS-COMMERCIAL BUILDING FLOOR PLANS

(Scale of Reduced Floor Plan: 1/32" = 1.0')

APPENDIX E

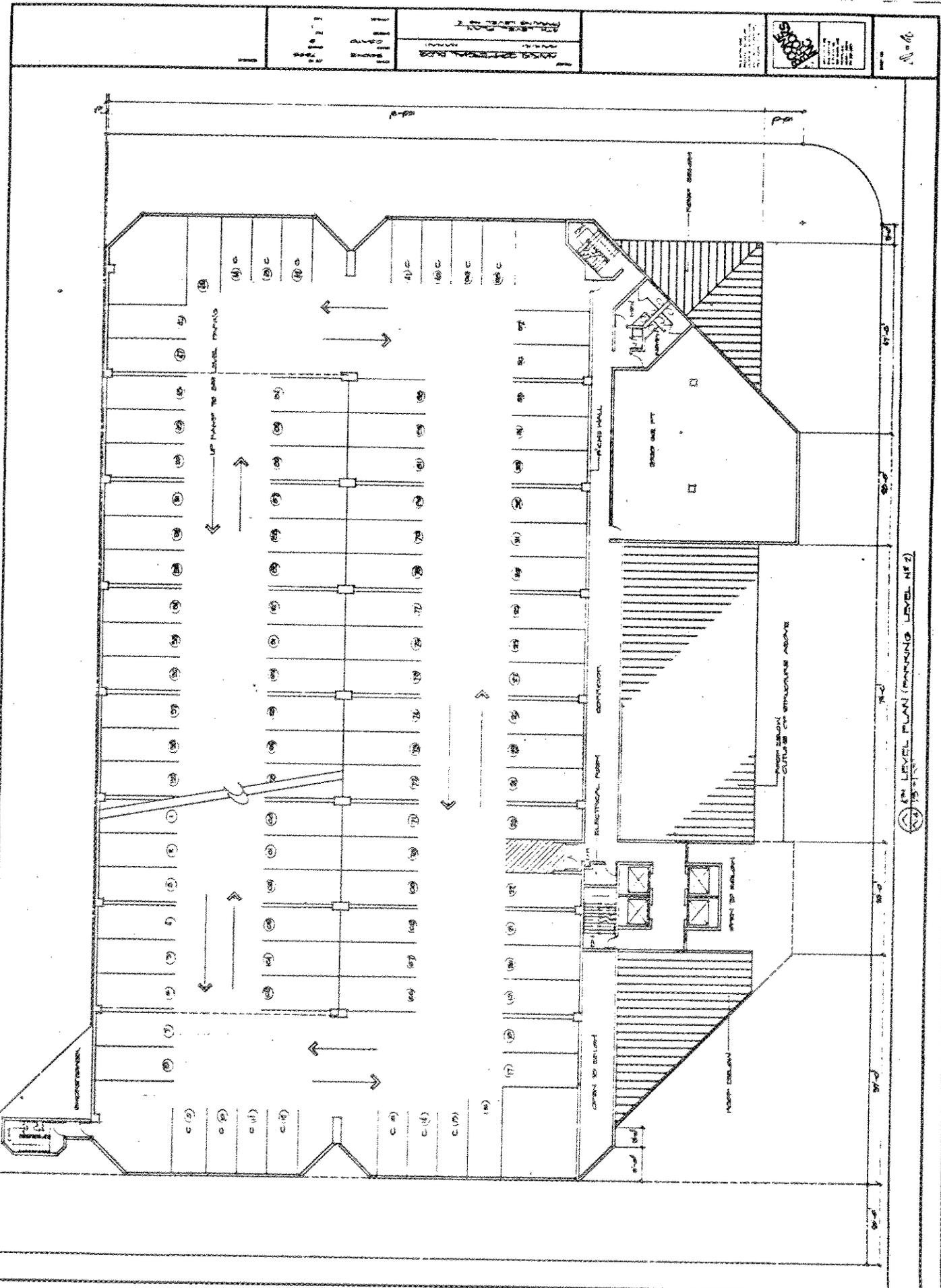
WAIKIKI TENNIS-COMMERCIAL BUILDING FLOOR PLANS





0th LEVEL PLAN (PARKING LEVEL) (1/10)

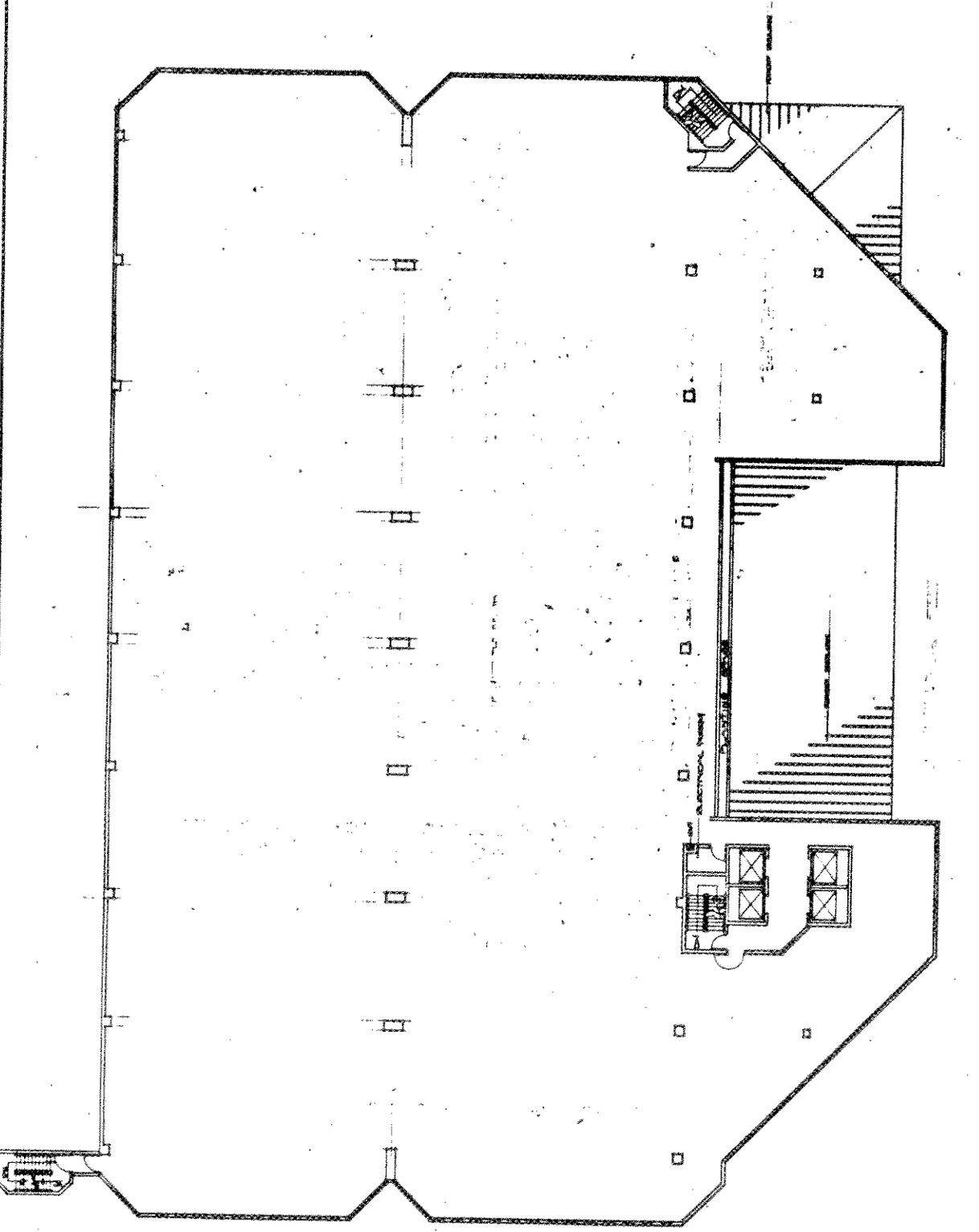
Architectural Department



2ND LEVEL PLAN (PARKING LEVEL N2)



SECRET
NOFORN
NO DISSEM TO THE MEDIA
NO DISSEM TO THE PUBLIC

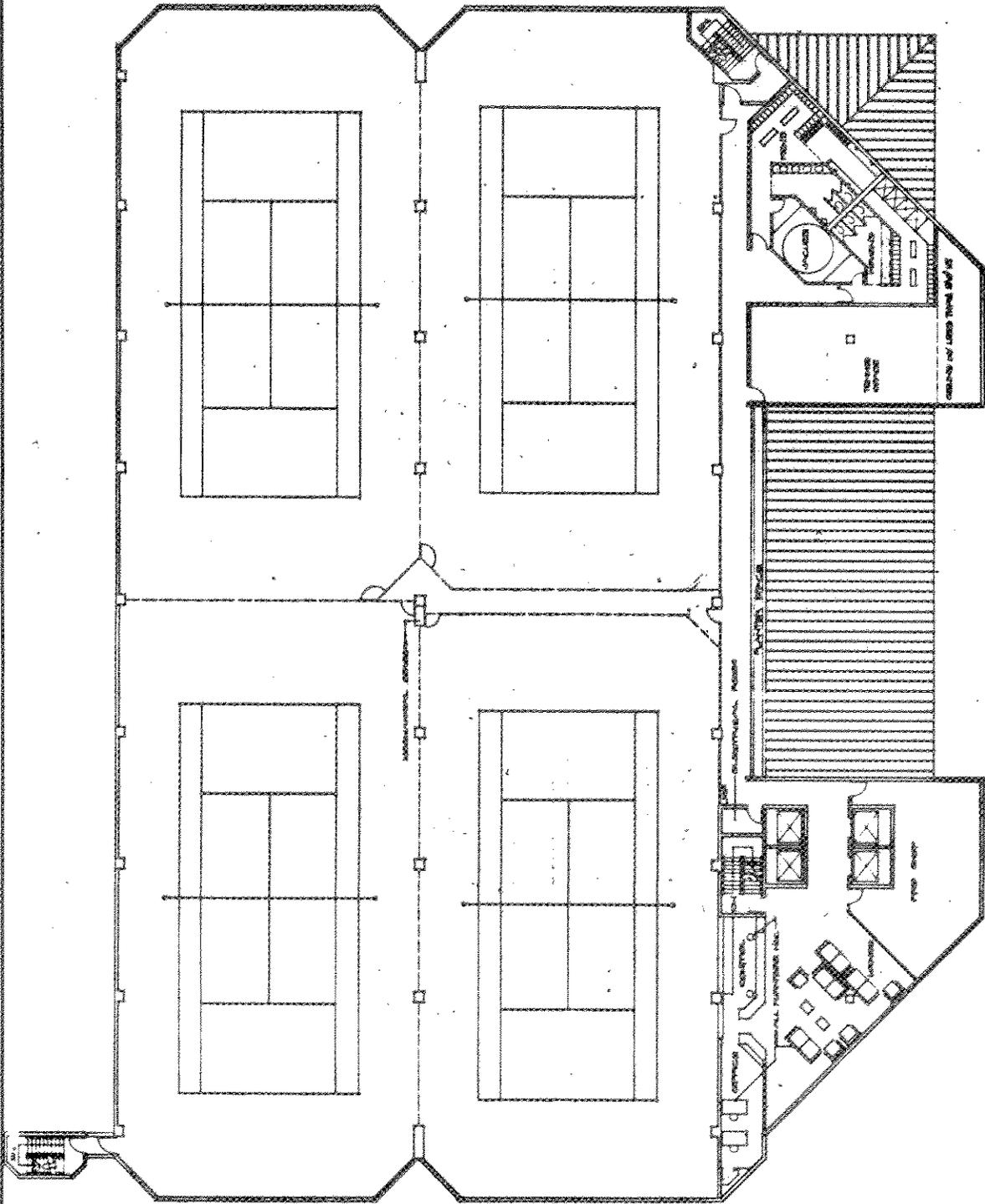


CHILDREN PLAY OFFICE

NO.	DATE	BY	REVISION



A-7
REVISED 10/1/57

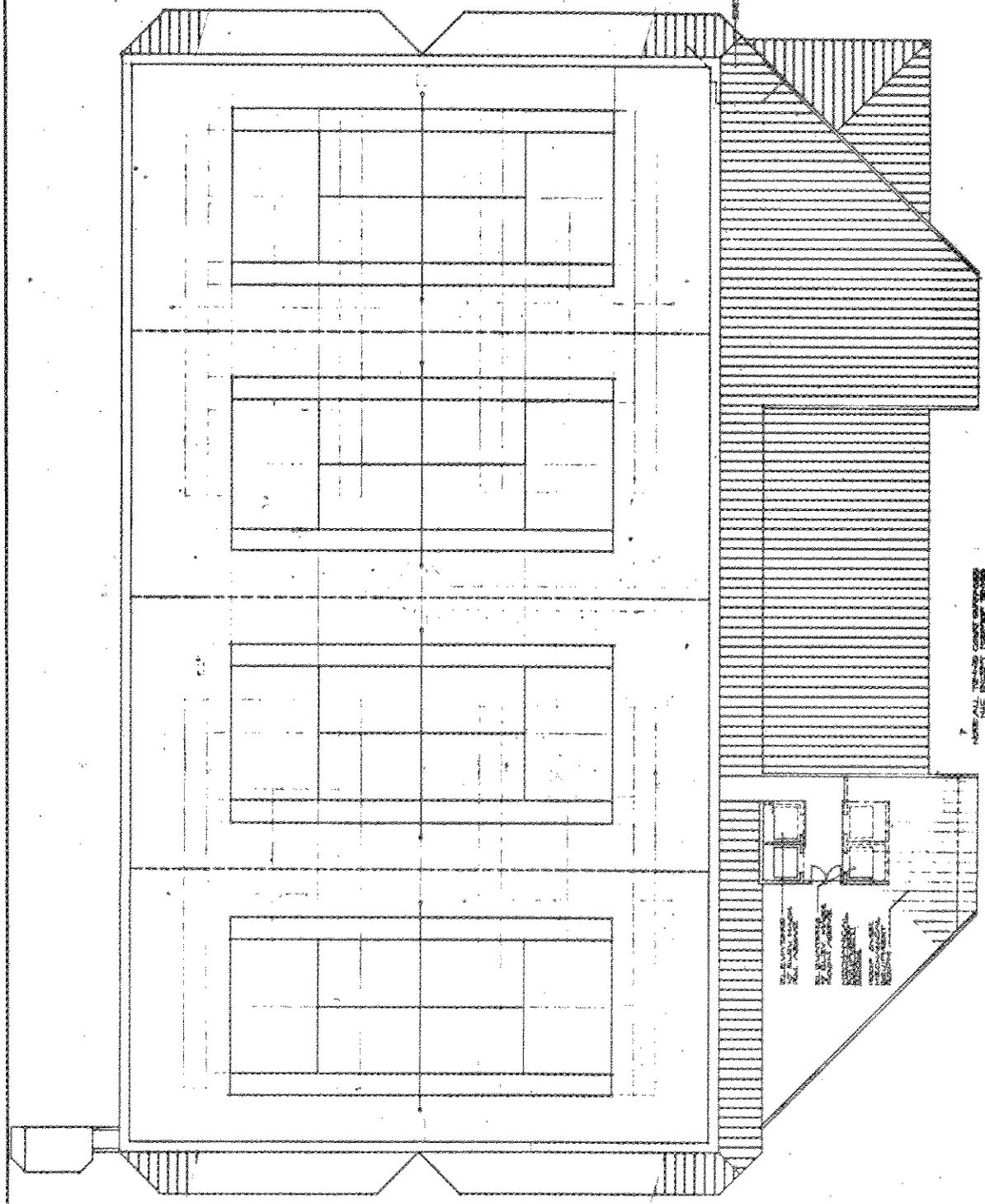


7th LEVEL PLAN (JURY'S COURT AND TESTIMONY ROOMS)



QUALITY MANAGEMENT SYSTEMS
NATIONAL BUREAU OF STANDARDS
INTERNATIONAL
NIST-100-100-100-100

DATE: 10/10/00
BY: [Signature]
CHECKED BY: [Signature]
APPROVED BY: [Signature]



7
ALL ROOMS ARE TO BE
CONCRETE FLOOR FINISH

7
FIRST FLOOR PLAN (TEND COURT & TECHNICAL AREA)
10/10/00