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Governor of Hawaii



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DEPARTMENT OF LAND AND NATURAL RESOURCES

OFFICE OF ENVIRONMENTAL  
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P. O. Box 621  
Honolulu, Hawaii 96809

FILE NO.: OA-30A  
I.D. NO.: 1709

APR 28 1995

MEMORANDUM

TO: Mr. Gary Gill, Director  
Office of Environmental Quality Control

FROM: Michael D. Wilson, Chairperson *Michael D. Coloma-Agaran*  
Board of Land and Natural Resources

Subject: Negative Declaration to Amend Conservation District Use  
Application OA-30 by Converting the Use of Buildings at Paradise  
Park to General Office and Retail Space (TMKs: 9-5-4: 7 & 18)

The Department of Land and Natural Resources has reviewed the comments received during the 30-day public comment period which began on March 8, 1995. Based on the information provided, we have determined that this project will not have significant environmental effect and have issued a negative declaration. Please public this notice in the OEQC Bulletin as soon as possible.

We have enclosed a completed OEQC Publication Form and four copies of the Final EA. Please contact Cathy Tilton of our Office of Conservation and Environmental Affairs at 587-0377, if you have any questions.

Enclosures

50

1995-05-23-0A-FEA - Paradise Park Bldg in ~~Construction Area~~ District  
Use permit

FINAL  
ENVIRONMENTAL ASSESSMENT  
AND  
NEGATIVE DECLARATION  
for  
Paradise Park

RECEIVED  
95 APR 24 PM 4:01  
DLNR  
OCEA

*Prepared for:*  
Paradise Park, Inc.

*Prepared by:*  
Wilson Okamoto & Associates, Inc.

Honolulu, Hawaii  
April 1995

*Final  
Environmental Assessment  
and  
Negative Declaration  
for*

**PARADISE PARK**

Manoa, Honolulu, Oahu, Hawaii  
April 1995

*Prepared for:*  
Paradise Park, Inc.  
1035 University Ave. Suite 201  
Honolulu, Hawaii 96826

*Prepared by:*  
Wilson Okamoto and Associates  
1907 South Beretania Street, Suite 400  
Honolulu, Hawaii 96826

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**PREFACE**

This final environmental assessment and negative declaration is prepared pursuant to Chapter 343, Hawaii Revised Statutes, and Title 11, Chapter 200, Administrative Rules, Department of Health, State of Hawaii. Proposed is a private action by Paradise Park, Inc.

**SUMMARY**

**Paradise Park  
Final Environmental Assessment  
Manoa, Honolulu, Oahu, Hawaii**

<b>Proposing Agency</b>	Paradise Park, Inc. 1035 University Ave. Suite 201 Honolulu, Hawaii 96826 <i>contact: James Wong, President</i>
<b>EA Preparer</b>	Wilson Okamoto and Associates 1907 South Beretania Street, Suite 400 Honolulu, Hawaii 96826 <i>contact: Earl Matsukawa, Project Manager</i>
<b>Tax Map Key</b>	2-9-54: 7 & 18
<b>Location</b>	Manoa, Honolulu, Oahu, Hawaii
<b>Proposed Action</b>	The Owner proposes to convert up to 6,742 square feet of existing exhibit space in the Main Building and 1,627 square feet of existing exhibit space in the Discovery Center to general office and retail use. The Owner also proposes to sublease all or portions of the existing buildings, including any converted spaces, to one or more tenants. The tenants would be provided with the right to use existing parking areas. Improvements to the existing buildings will be limited to interior improvements necessary to accommodate the needs of the tenants.
<b>Impacts</b>	No significant impacts are anticipated

## I. INTRODUCTION

### A. BACKGROUND

Manoa Valley is one of several fingers of residential communities extending mauka in valleys and on ridge tops of the Koolau Range from the urban center of Honolulu and Waikiki. As one of the larger valleys, Manoa measures approximately two and a half miles from the base of the Koolau Mountain Range to the mouth of the valley at the McCully area. The Manoa community includes the University of Hawaii Manoa Campus, Punahou School, two elementary schools, Manoa Marketplace Shopping Center, a variety of community facilities as well as Paradise Park.

Paradise Park is located at the head of the valley, at the end of Manoa Road. Previously, it was a visitor attraction which peaked in activity in the early eighties; but, due to the recent decline in the visitor industry, the park was eventually closed in 1993. North of the park is Lyon Arboretum, which is dedicated to the conservation of rare vegetation. See Figure 1.

### B. EXISTING CONDITIONS

Currently, Parcels 7 and 18 (TMK 2-9-54: parcels 7 & 18) are being used as follows (see Figures 2 & 3):

Parcel 7 Parcel 7, consisting of approximately 35.2 acres contains three existing parking areas with a total of 117 automobile and bus stalls linked by service roads to parcel 18, as well as ancillary structures and facilities used for bird propagation operations.

Parcel 18 Parcel 18, consisting of approximately 12.3 acres, contains the existing zoological/botanical gardens operated by Paradise Park, Inc. These improvements include: a Main Building (approximately 28,911 square feet of floor area which includes offices, retail gift shop, Treetops Restaurant, and exhibition facilities); the Cultural Pavilion; the Discovery Center (approximately 1,627 square feet of exhibition space); Amphitheater; Ethnic Garden structures; numerous exhibits (ponds, rare vegetation, and exotic birds); rest stations, pathways and other facilities; and, several maintenance facilities and smaller buildings.

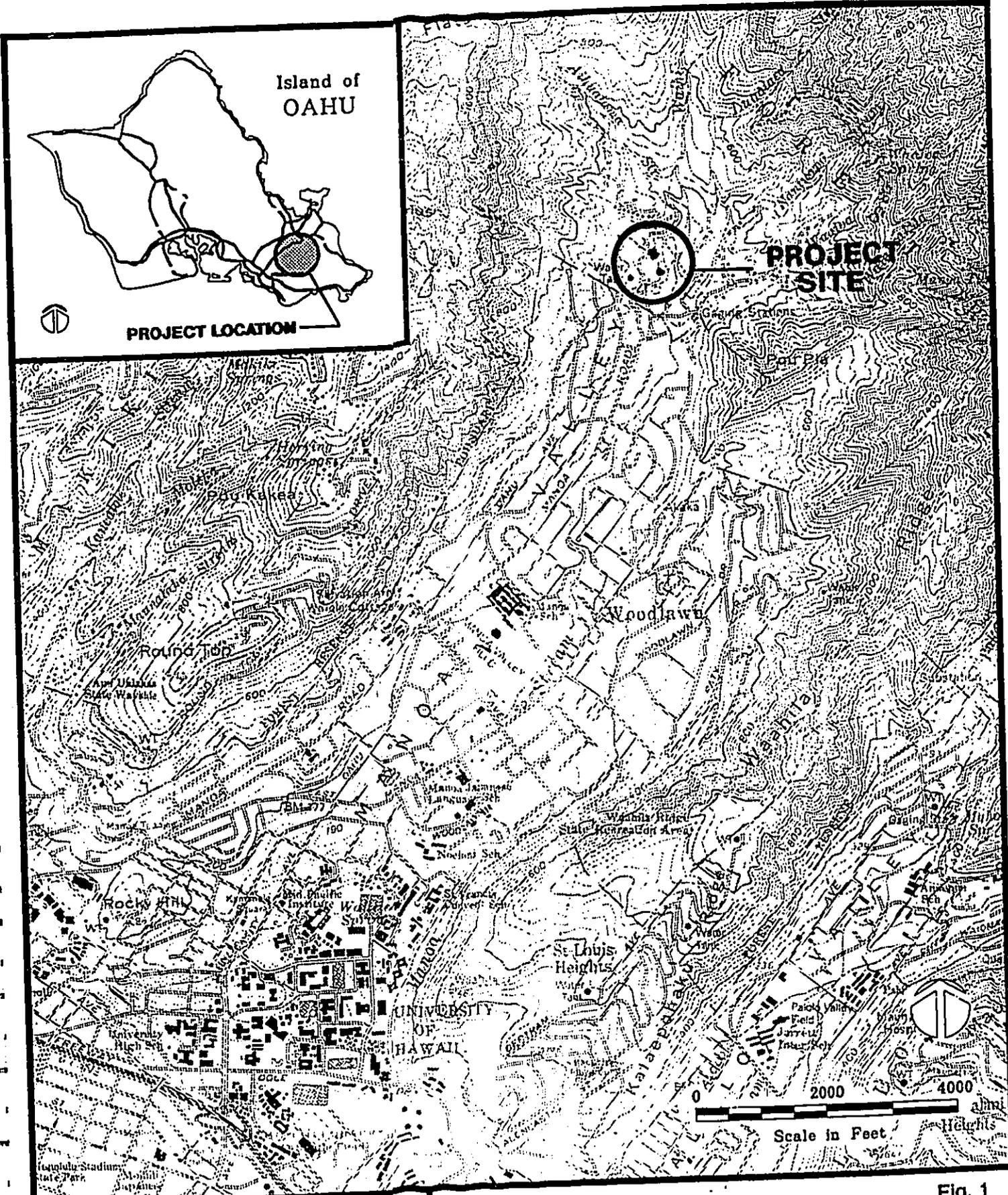


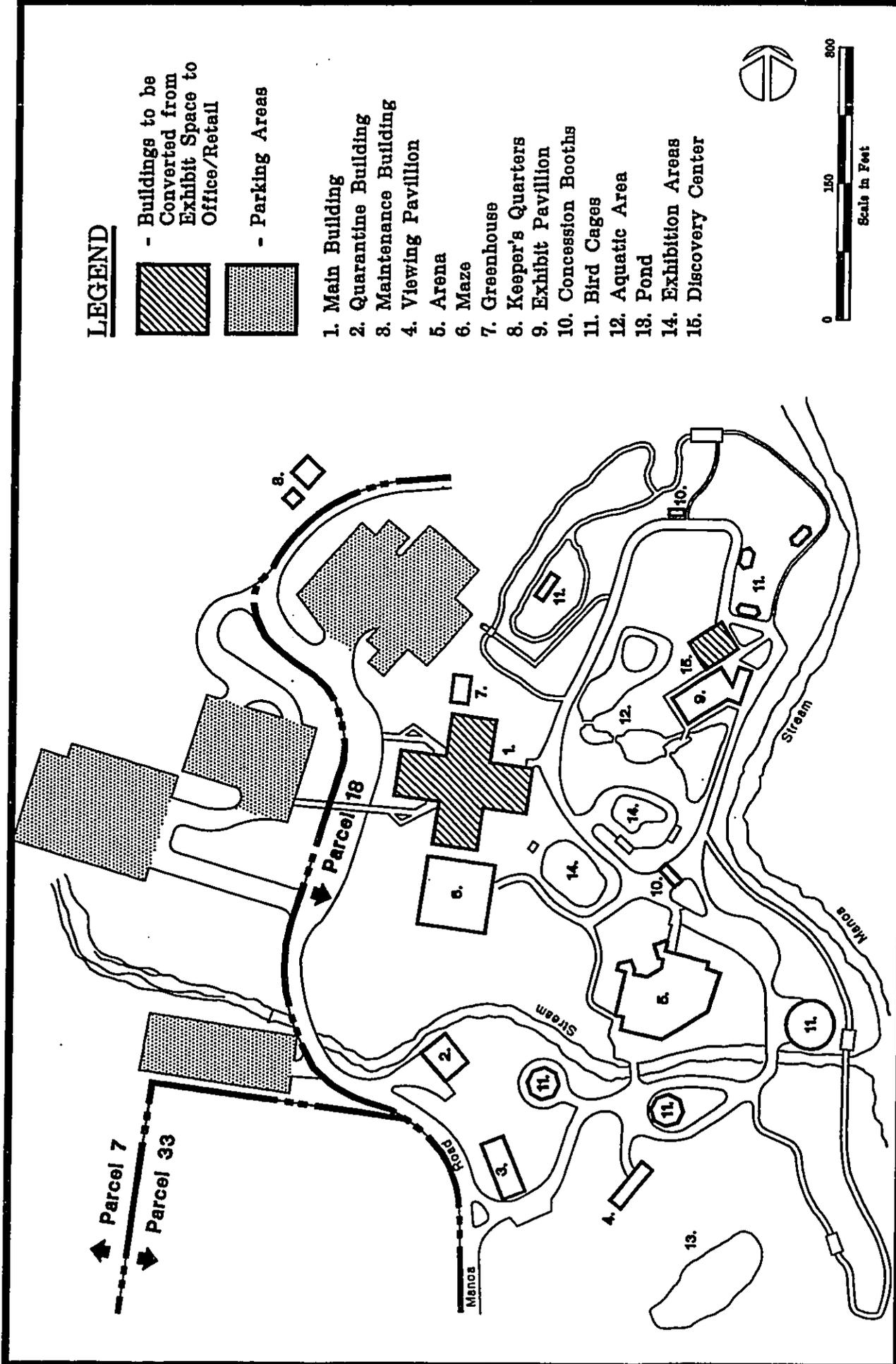
Fig. 1

**PARADISE PARK**  
 Environmental Assessment

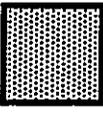
**LOCATION MAP**

Prepared for:  
 Paradise Park

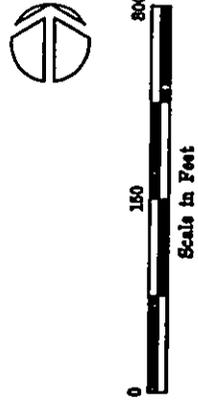
Prepared by:  
 Wilson Okamoto & Associates, Inc.



**LEGEND**

-  - Buildings to be Converted from Exhibit Space to Office/Retail
-  - Parking Areas

1. Main Building
2. Quarantine Building
3. Maintenance Building
4. Viewing Pavillion
5. Arena
6. Maze
7. Greenhouse
8. Keeper's Quarters
9. Exhibit Pavillion
10. Concession Booths
11. Bird Cages
12. Aquatic Area
13. Pond
14. Exhibition Areas
15. Discovery Center

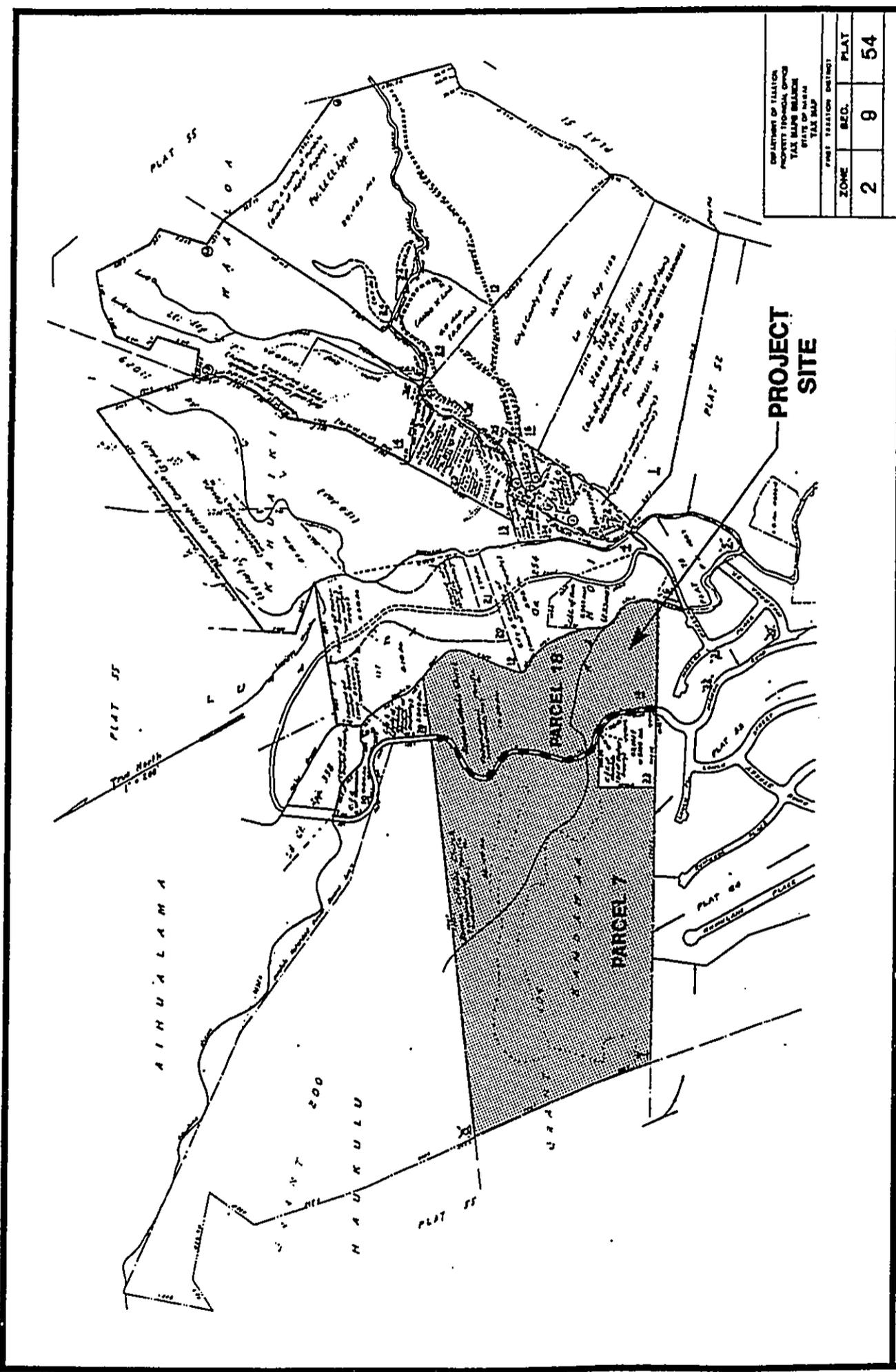


**PARADISE PARK**  
Environmental Assessment

**SITE MAP**

Prepared for:  
Paradise Park  
Prepared by:  
Wilson Okamoto & Associates, Inc.

Fig. 2



DEPARTMENT OF TERRITORY PROPERTY INFORMATION TAX MAPS DIVISION STATE OF HAWAII TAX MAP		
PUNA TERRITORY DISTRICT		
ZONE	SEC.	PLAT
2	9	54

Prepared for:  
**Paradise Park**  
 Prepared by:  
**Wilson Okamoto & Associates, Inc.**

**Fig. 3**

**PARCEL MAP**

**PARADISE PARK**  
 Environmental Assessment

**C. DEVELOPMENT PROPOSAL**

The Owner proposes to continue Paradise Park's botanical and zoological gardens; however, the Owner proposes to use the existing buildings to house tenants that are either (i) entities whose primary business involves the protection or enhancement of the environment, (ii) entities involved in research and development in the zoological and botanical sciences, (iii) educational entities, (iv) community non-profit organizations, and/or (v) other organizations and businesses ancillary to Paradise Park's botanical and zoological gardens and its tenants. Once Paradise Park is able to obtain permission to sublease to organizations that fit within the five categories described above, the Owner can begin obtaining firm commitments from such entities to utilize the areas that were previously used as part of the Park's visitor attraction.

As of this date, the Owner has received interest to utilize Paradise Park from the following:

With respect to entities that fall within category (i),  
*Nature Conservancy, Landscape Industry Council;*

With respect to entities that fall within category (ii),  
*Lyons Arboretum, UH Research Foundation;*

With respect to entities that fall within category (iii),  
*Ecomedia, Inc., DLNR Environmental Education Center,  
Paradise Park Community Foundation;*

With respect to entities that fall within category (iv),  
*Outdoor Circle, Sierra Club, Moanalua Gardens Foundation;*

With respect to entities that fall within category (v),  
*the Treetops Restaurant and the gift shop, both of which were in operation at the  
time the Park maintained its visitor attraction.*

Sublessees that are willing to share in the upkeep and maintenance of the zoological and botanical gardens of the Park shall be given preferential consideration by the Owner.

To accommodate its potential tenant or tenants, the Owner is proposing to convert up to 6,742 square feet of existing exhibit space in the Main Building and 1,627 square feet of existing exhibit space in the Discovery Center to general office and retail use. The conversion in the Main Building would be in the area formerly occupied by the dinosaur exhibit, the conversion in the Discovery Center is within the current structure. All other uses would remain the same, including the existing offices, souvenir shop and restaurant

in the Main Building. The Owner would sublease all or portions of the existing buildings, including any converted spaces, to one or more tenants. The tenants would be provided with the right to use existing parking areas. The Owner will continue its bird propagation activities and operations. No new construction of structures is proposed. Any repairs, maintenance or improvements will be limited to the existing buildings only.

The Owner intends to maintain the presently existing botanical and zoological gardens and continue its plant and bird sales operations located on Parcel 18. The existing restaurant (Treetops Restaurant, which occupies the second floor of the Main Building) will remain open.

**D. NEED**

Since the closure of Paradise Park as a visitor attraction, its owners have been seeking an appropriate replacement use for economic reasons. The proposed subleasing offers an opportunity to meet both the Owner's needs and those of (a) sublessee(s) seeking a general office space.

## II. ENVIRONMENTAL ASSESSMENT

### A. PHYSICAL ENVIRONMENT

#### 1. Climate

Like all of the Hawaiian Islands, Oahu has two distinguishable seasons. During May through September, summer weather prevails, bringing warmer temperatures and steady Northeast tradewinds. In the winter months, from October to April, the temperature cools and the tradewinds are more frequently interrupted by southeasterly and southwesterly storms.

At the project site, the average temperature fluctuates from 69.4 degrees Fahrenheit in the winter to 75.2 degrees in the summer. Median annual rainfall, as recorded by State Weather Station No. 716 in Manoa Valley amounted to 141.83 inches per year. Rainfall distribution is slightly higher in the winter months, with a dramatic increase in precipitation in the beginning (October-November) and end (March-April) of winter.

#### 2. Topography

The topography of the entire park slopes east, from a high point of approximately 400 feet above mean sea level (MSL) at the upper parking area to a low point of approximate 310 feet MSL at the downstream end of Haukulu Stream as it exits the property. The Main Building sits at approximately 360 feet MSL.

#### 3. Geology

Paradise Park is nestled deep in Manoa Valley against the Koolau Mountain Range. A wide valley, Manoa stretches a mile from Waahila Ridge to Tantalus at its widest point. The valley floor is alluvium deposited by the Manoa Stream Tributary System from the weathered Koolau Mountains which are composed primarily of thin basalt with minor amounts of ash and their associated dike feeders. Rocks on the valley floor are composed mainly of nephelinite deposited during later eruptive phases through numerous cinder cones in the area.

#### 4. Soils

On the project site, Hanalei Stony Silty Clay is prevalent. The runoff from this soil is slow and the erosion hazard is slight. The slope from this soil ranges from 2% to 6%. Drainage is poor as the soil tends to remain mostly wet.

5. Flood/Tsunami Hazard

As shown on the Flood Insurance Rate Map (FIRM) the project site is located in Zone X, well outside the 500-year flood plain.

Because the site is approximately four miles from the ocean, a tsunami hazard is nonexistent.

6. Vegetation

As it was previously operated as a visitor attraction, the site is heavily landscaped with maintained trees, plants and shrubs, some of which are native.

7. Fauna

Common fauna at the site includes feral cats, rats, dogs, several exotic species of birds, such as the Common Myna, house finch, Barred dove, house sparrow, Brazilian cardinal, spotted dove and bulbul, and possibly feral pigs. Native species of birds possibly present are the elepio, pueo and amakihi. In addition, numerous exotic species of caged birds and fish in ponds are being propagated at the Park in support of the zoological garden.

8. Archaeological/Historical Sites

The Manoa Agricultural Site is documented on the State Historic Preservation Register as No. 50-80-14-3953. It is located about 1,250 feet west of the parking lots, in the vegetation. The site is amorphous, covering almost 100 square yards. Site features include seven stone cairns and two stone walls, running about 20 yards.

9. Visual

Since Manoa Valley receives abundant precipitation, vegetation at the site, though tended, also grows very dense. Many exotic and native flowering plants, shrubs and trees are present in the area, creating a tropical rainforest biome.

10. Land Use

Paradise Park is in the State Land Use District *Conservation* classification with a subzone designation of *Resource*. The City and County of Honolulu Development Plans Land Use Map designates the park to be *P-1 Preservation*. The area is not within the City's Special Management Area.

**B. INFRASTRUCTURE**

**1. Water**

According to the Board of Water Supply, the site is serviced by two meters, a six-inch fire and two-inch domestic.

**2. Wastewater**

Wastewater from the site is collected by the municipal sewer system and conveyed to the Sand Island Wastewater Treatment Plant for treatment and disposal through an ocean outfall.

**3. Drainage**

Drainage from the site sheet flows in a westerly direction and is collected by Haukulu Stream which flows into Manoa Stream, conveying it to the Manoa-Palolo Drainage Canal and through Ala Wai Canal where it is discharged into the ocean at Ala Wai Boat Harbor.

**4. Roadway System/Traffic**

Two major roads, Manoa Road and Oahu Avenue, provide vehicular access into Manoa Valley from Punahou Street and University Avenue, respectively. These roads join approximately one and a quarter mile south of Paradise Park, with Manoa Road continuing in the valley to serve Paradise Park and Lyon Arboretum.

As a visitor attraction, Paradise Park generated significant vehicular traffic. A shuttle bus operated by Paradise Park transported tourists to and from Waikiki four times a day in addition to other tour companies' buses making regular stops at the park throughout the day. In addition, traffic was generated by automobiles of both visitors and employees.

**5. Electrical**

Hawaiian Electric Company, Ltd. supplies Paradise Park with electrical power via over-head power lines.

6. Gas

Propane gas is supplied by Oahu Gas Service, Inc., with an on site above ground tank.

C. SOCIO-ECONOMICAL CHARACTERISTICS

According to the 1990 U.S. Census, the population of the Upper Manoa community (census tracts 31.01 & 31.02) is estimated at 7,432 people. Fifty-six percent of the population are age 40 or older. Of those 16 or older, 66.8% are working. The median household income is \$61,618, which is \$22,697 more than the median household income for the State of Hawaii.

### III. ENVIRONMENTAL IMPACTS

#### A. SHORT-TERM IMPACTS

Because construction activity will be limited to modifications of buildings within the exterior columns of existing buildings, there will be negligible or no short-term impacts on ambient noise levels, air quality, water quality, vegetation, public safety and the historical site.

#### B. LONG-TERM IMPACTS

Long-term impacts of the proposed project compared to the prior use of the property will significantly improve with respect to traffic, noise, air quality, demand on utilities, and vegetation. There will be no change in visual impact since no new structures or exterior additions to existing structures will be constructed.

##### 1. Traffic

In general, the amount of traffic generated as a result of continuing the botanical zoological gardens will not exceed the amount of traffic associated with the former operation of Paradise Park and will likely be slightly less.

A trip generation assessment based upon generally accepted techniques developed by the Institute of Transportation Engineers (ITE) and published in Trip Generation Handbook, 5th Edition, 1991 was prepared for the proposed conversion of 8,369 square feet of space to office/retail use. The ITE rates are developed empirically, by correlating the vehicle trip generation data with land use characteristics. Trips by employees, visitors, deliveries are accounted for in the trip generation estimate.

According to the ITE, the conversion of a maximum of 8,369 square feet of exhibit space could generate up to 55 trips during the morning peak traffic period and 57 trips during afternoon peak traffic periods. However, commuter traffic generated by the Park will be in the opposite direction of that generated by the residents in Manoa Valley during peak traffic hours. Residents will be heading out of Manoa Valley during the peak morning hours while the sublessee(s)' employees will be heading into Manoa and vice-versa for the afternoon peak.

Furthermore, overall traffic should lessen. Because the Park will no longer operate as a visitor attraction, traffic generated by the park during weekends and off-peak traffic hours will significantly decline. Thus, the sublessee(s) will not adversely affect peak traffic flow.

It should be noted that intersection analysis was not considered in the assessment since the nearest major intersection is located more than one mile from the project site. The trips generated from the project site during the peak periods of traffic are relatively low and within the peak period daily fluctuation of intersection service volumes. Further, as stated above, employee traffic generated by the proposed project is expected to occur in opposing directions of peak period commuter traffic flow. Visitor and delivery trips are expected to occur during business hours (off-peak periods) when intersection service volumes are significantly less.

Based on the parking requirements specified in Table 3.1 (A) of the City and County of Honolulu Land Use Ordinance, 8,369 square feet of office and/or retail use would require a total of 21 stalls.

## 2. Noise

Ambient noise will be restricted to those levels specified in the State of Hawaii's Department of Health (DOH) Rules and Regulations. Allowable noise levels for districts zoned Preservation (P-1) are 55 dB from 7 am to 10 pm, and 45 dB from 10 pm to 7 am (DOH §11-43-3). Such settings and activities typical of the aforementioned noise levels include conversational speech and living rooms (See Figure 4).

The DOH Rules and Regulation states that "*where the allowable noise level between two adjacent zoning districts differ, the lower allowable noise level shall be used.*" In this case, the adjacent district is zoned Residential, which shares similar noise limits as districts zoned Preservation.

## 3. Air Quality

Because of the nature of the sublessee(s) as offices for educational/community/environmental organizations, there will be no activities which release particles or chemicals into the air. In addition, the level of vehicular emissions will be reduced in comparison to the park's prior operations as a visitor attraction.

## 4. Utilities

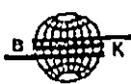
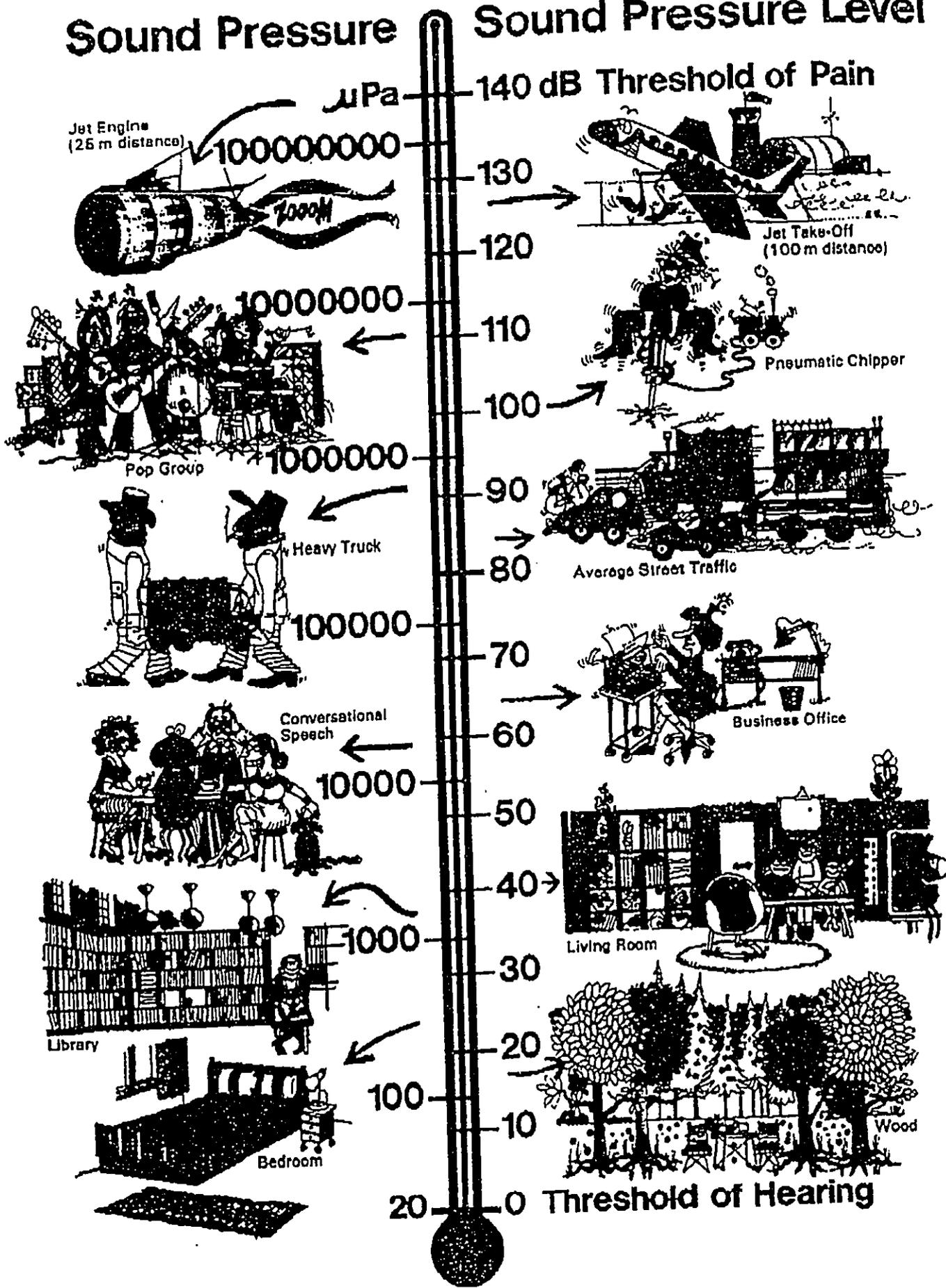
Depending upon the needs of the tenant(s), improvements to utility lines may be required. Installation of utility improvements will need to be approved by the Department of Land Utilization in order to obtain building permits for renovation.

5. Vegetation

In the long run, by maintaining the existing zoological and botanical gardens, the sublessee(s)' activities will enhance protection and propagation of rare plant species in Hawaii. No pest exotic species will be propagated at the zoological and botanical gardens. Plants which are potential pests to the environment are banned from importation by the State of Hawaii Department of Agriculture (DOA). The DOA Plant Quarantine Branch maintains surveillance at all ports of entry into the State.

Sound Pressure

Sound Pressure Level



Brüel & Kjær

DK-2850 NÆRUM, DENMARK · Telephone: +45 2 80 05 00 · Telex: 37316 bruka dk

Fig. 4

**IV. ALTERNATIVES**

**A. NO ACTION**

The no action alternative will leave the site in its present state with no restoration of employment or other economic benefits formerly associated with the Paradise Park operation. Moreover, the interpretive and educational value of the botanical park to the public will be lost.

**B. RESTORATION**

Restoration of the site to a function similar to Paradise Park is economically unfeasible at this time. The main reason for Paradise Park's closure in 1993 was the poor state of the economy and low tourism levels. Since then, neither have improved enough to realistically re-open the park as a visitor attraction.

**C. ALTERNATIVE USES**

Under the proposed use change, options for the exact nature of the entity or entities which occupy Paradise Park are still open. However, the entity or entities which does sublease Paradise Park must fall within one or more of the five categories listed in the Development Proposal. Thus, the sublessee(s) shall have a direct connection with the botanical and zoological gardens as an educational and/or environmental resource, but how it relates to the gardens is yet undecided.

**V. DETERMINATION**

Based on the environmental assessment and comments received during the consultation phase, it has been determined that the project will not have a significant effect on the environment, as defined by Section 11-200-12, Hawaii Administrative Rules, Department of Health. The proposed action does not require an environmental impact statement.

The proposed action will not have any adverse impacts to the surrounding environment in that its demands will not exceed the current infrastructure. Furthermore, all renovations will be interior, minimizing any impacts to the surrounding community. In the long run, the botanical and zoological gardens will be enhanced due to the upkeep and maintenance by tenants of the Park. In addition, the community will gain an environmental community resource while the Owners will be able to offset their losses from the closure of Paradise Park.

VI. REFERENCES

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**VII. AGENCIES CONSULTED**

A Draft Environmental Assessment (EA) was distributed to appropriate State and City & County Agencies, with a request for comments on the Draft EA. Eleven letters were received, of which seven had substantial comments, as indicated by a ✓, below. The

State Agencies

- ✓ Department of Land and Natural Resources - Chair
- Department of Land and Natural Resources - Forestry and Wildlife
- Department of Land and Natural Resources - Historic Preservation
- ✓ Department of Land and Natural Resources - Land Management
- ✓ University of Hawaii Environmental Center

City & County Agencies

- ✓ Board of Water Supply
- Department of Land Utilization
- ✓ Planning Department

Individuals and Organizations

- ✓ Manoa Neighborhood Board No. 7
- ✓ Robert E. Thomas
- Ann Kobayashi

Subsequently, the Draft EA was withdrawn and a Revised Draft EA was submitted. Copies of the Revised Draft EA were distributed to appropriate State and City & County Agencies, with a request for comments on the document. As of April 7, 1995, seven comment letters were received. Of these, four had substantial comments as indicated by the ✓ below. All comment letters and corresponding responses have been reproduced herein.

State Agencies

- Department of Land and Natural Resources - Forestry and Wildlife
- ✓ Department of Land and Natural Resources - Chair
- ✓ University of Hawaii Environmental Center

City & County Agencies

- Planning Department

Individuals

- ✓ Robert E. Thomas
- Donald G. Aten
- ✓ Tom Heinrich

Comments and Responses  
for the  
Draft EA

BENJAMIN J. CAYETANO  
GOVERNOR OF HAWAII



KEITH W. AHUE, CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES

DEPUTIES  
JOHN P. KEFFELER, II

REF: OCEA: SKK

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

RECEIVED  
DEC 22 1994

P. O. BOX 621  
HONOLULU, HAWAII 96809

FILE: OA-30A  
Acceptance Date: 12/2/94  
180-Day Exp. Date: 5/31/95

WILSON OKAMOTO & ASSOC. INC.

AQUACULTURE DEVELOPMENT  
PROGRAM  
AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
CONSERVATION AND  
ENVIRONMENTAL AFFAIRS  
CONSERVATION AND  
RESOURCES ENFORCEMENT  
CONVEYANCES  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
LAND MANAGEMENT  
STATE PARKS  
WATER AND LAND DEVELOPMENT

Mr. Earl K. Matsukawa  
Wilson Okamoto & Associates, Inc.  
P.O. Box 3530  
Honolulu, Hawaii 96811

Dear Mr. Matsukawa:

NOTICE OF ACCEPTANCE AND ENVIRONMENTAL DETERMINATION  
Conservation District Use Application

This acknowledges the receipt and acceptance for processing your application to amend existing permit OA-30. The purpose of the amendment is to seek an appropriate replacement use of Paradise Park since its close in 1993 due to economic reasons. According to your information you propose to convert the use of buildings (including the Main Building, Cultural Pavilion, Discovery Center and Amphitheater) on parcel 18 for the primary uses of general office and retail space. Additionally, you propose to sublease all or portions of the buildings to one or more tenants and provide tenant parking on parcel 7.

Buildings will be improved upon (primarily the interior) as necessary or required to accommodate the tenants. No new structures, additions, or extensions of the existing buildings are proposed to be built in conjunction with the changes sought in the application.

No change is proposed for the following existing operations:

1. The zoological and botanical garden areas on parcel 18. However, you anticipate that a non-profit organization will maintain the garden and grounds rather than Paradise Park. Additionally, plant sales and seminars on botanical, zoological, and ecological subjects will continue.
2. The existing Treetops Restaurant. However, when the Treetops Restaurant's lease expires, the space may be converted to office and/or retail use.
3. The existing bird propagation operations on parcel 7.

4. The use of parcel 7 for parking.

After reviewing the application, we find that:

1. The proposed use is a conditional use within the Resource subzone of the Conservation District according to Administrative Rules, Title 13, Chapter 6, as amended;
2. A public hearing pursuant to Section 183-41, Hawaii Revised Statutes (HRS), as amended, will be required in that the proposed use is of a commercial nature; and
3. In conformance with Title 11, Chapter 200, of the Administrative Rules, and Act 241, SLH 1992, a negative declaration was determined for the proposed action.

As the applicant, please be advised that it will be your responsibility to comply with the provisions of Section 205A-29(b), Hawaii Revised Statutes, relating to Interim Coastal Zone Management (Special Management Area) requirements.

Negative action as required by law, on your application by the Board of Land and Natural Resources can be expected should you fail to obtain from the County thirty (30) days prior to the 180-day expiration date, as noted on the first page of this notice, one of the following:

1. A determination that the proposed development is outside the Special Management Area (SMA);
2. A determination that the proposed development is exempt from the provisions of the county ordinance and/or regulation specific to Section 205A-29(b), HRS; OR
3. A Special Management Area (SMA) permit for the proposed development.

Additionally, we are concerned with the lack of specific information in the application regarding the proposed numbers and types of general offices, and retail uses. This information is critical in our ability to adequately assess the potential impacts of the proposed project. The Draft Environmental Assessment (EA), for example, is woefully inadequate in disclosing specific information about the proposed changes in use and its effects upon the surrounding community. As a result, the conclusions made on pages 8 and 9 of the Draft EA regarding "Environmental Impacts," for example, appear to be unfounded.

Additionally, our letter to you dated October 20, 1994, expressed concerns, among others, regarding the long-range management plan of the botanical and zoological garden in coordination of the then-proposed use by Ecomedia, Inc. (see attached). Please provide us with a description of the long-range plans for the garden and proposed general offices and retail uses.

As identified on page 9, Section C. "Alternative Location" of the Draft EA, the "prospective sublessee(s) could be accommodated in almost any commercial office or retail space." Please include an alternative that discusses other types of uses which may or may not be economically feasible for the applicant but are less urban intensive.

Also, we question the commencement and completion dates identified on page 7. If the applicant does not know who the prospective sublessee(s) are, the types of improvements that may be required to accommodate their needs, and when the sublessee(s) would occupy the spaces, then the time frames identified on page 7 may need to be adjusted.

Pending action on your application by the Land Board in the near future, your cooperation and early response to the matters presented herein will be appreciated. Should you have any questions, feel free to contact Cathy Tilton of our Office of Conservation and Environmental Affairs staff at 587-0377.

Very truly yours,

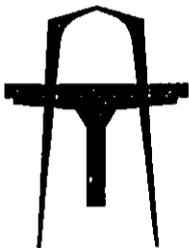
  
KEITH W. AHUE

Attachment

cc: Oahu Board Member  
C&C Dept. of Planning  
C&C DLU, BWS  
DOH/OSP/OHA

April 3, 1995

**WILSON  
OKAMOTO**  
& ASSOCIATES, INC.



ENGINEERS  
ARCHITECTS  
PLANNERS

1907 S. BERETANIA STREET  
HONOLULU, HAWAII 96826  
PH: (808) 946-2277  
FAX: (808) 946-2253

Mailing address:  
P. O. Box 3530  
Honolulu, Hawaii 96811

Mr. Michael D. Wilson, Chairperson  
Department of Land and Natural Resources  
P.O. Box 621  
Honolulu, Hawaii 96809  
ATTN: Cathy Tilton

Dear Mr. Wilson:

Subject: Paradise Park Request to Amend Existing  
Conservation District Use  
Paradise Park Use Change  
Draft Environmental Assessment (EA)  
Manoa, Oahu

As you are aware the Draft EA accompanying the CDUA has since been withdrawn and we have prepared and filed a Revised Draft EA that more clearly discusses the proposed action. We offer the following responses to the comments of December 21, 1994 from Mr. Keith Ahue, based on the Revised Draft EA:

1. Operation of the zoological/botanical garden will continue under the current proposal as will office and retail uses in existing buildings, although the tenants may be different. The proposed change in use would convert a limited amount of existing exhibition space into office and retail use.
2. The Draft EA specifies the types of tenants to be considered for the facility. Such tenants include those involved in the protection or enhancement of the environment, those involved in research and development in zoological and botanical sciences, educational entities, community non-profit organizations and/or other organizations and businesses ancillary to Paradise Park's botanical and zoological gardens and tenants. We believe that by limiting the types of tenants to be considered for the office/retail space, compatibility with the Conservation District can be maintained.
3. Your comment regarding alternatives to the proposed action suggests examining other uses which may be less urban intensive. As clarified in our Draft EA, we are proposing the conversion of a limited amount of exhibit space to office and retail use. We do not concur that this is necessarily a conversion to a more urban intensive use. Given the volume of visitors associated with the park when the exhibits were a feature attraction, the proposed office and retail use would likely be less intensive.

**WILSON**  
**OKAMOTO**  
**& ASSOCIATES, INC.**

April 3, 1995  
Mr. Michael D. Wilson  
Page 2

Regarding less intensive uses of the facilities, we are puzzled as to what you may be suggesting, e.g. residential, kennels, animal husbandry? While some of these could be considered less urban in nature, they may also be better accommodated in a less urban setting where neighbors may not be in such close proximity.

4. We appreciate your noting the potential difficulty in meeting the commencement and completion dates for the use change. The dates would depend on when a suitable tenant(s) can be secured and their schedule for occupation. We would prefer to leave the dates as undetermined for now.

Should you have any further questions, please feel free to contact me at 946-2277.

Sincerely,



Earl Matsukawa  
Project Manager

EM/ak

cc: Darryl Wong, Paradise Park, Inc.  
Kerry Komatsubara, Furutani, Sato and Komatsubara  
Cathy Tilton, Office of Conservation and Environmental Affairs

07-30A

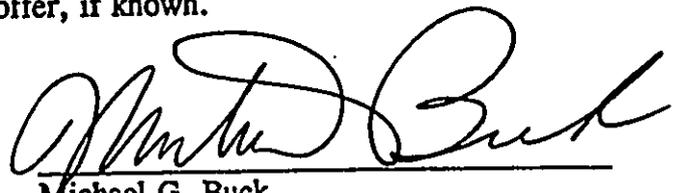
CT

December 29, 1994

RE: File No. OA-30A

Although we have no significant objections to the request, and the proposed use is consistent with the current subzone designation, it is not known how many vendors will be using the building spaces nor the type of products/services they will offer. The applicant should at least inform the Board how many vendors they hope to sublease the spaces to and what products/services they will offer, if known.

cc: Oahu District



Michael G. Buck  
Administrator

RECEIVED  
94 DEC 30 AM 10:16  
DLINR  
OCEA

BENJAMIN J. CAYETANO  
GOVERNOR OF HAWAII

RECEIVED



'95 JAN 3 PM 1:23

STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES  
DLNR  
OCEA

STATE HISTORIC PRESERVATION DIVISION  
33 SOUTH KING STREET, 6TH FLOOR  
HONOLULU, HAWAII 96813

December 29, 1994

MICHAEL D. WILSON, Chairperson  
BOARD OF LAND AND NATURAL RESOURCE

DEPUTIES

JOHN P. KEPPELER II  
DONA L. HAKAHE

AQUACULTURE DEVELOPMENT  
PROGRAM

AQUATIC RESOURCES  
CONSERVATION AND

ENVIRONMENTAL AFFAIRS  
CONSERVATION AND  
RESOURCE ENFORCEMENT

CONVEYANCES

FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION

DIVISION

LAND MANAGEMENT  
STATE PARKS  
WATER AND LAND DEVELOPMENT

MEMORANDUM

LOG NO: 13546  
DOC NO: 9412EJ29

CT

TO: Roger C. Evans, Administrator  
Office of Conservation and Environmental Affairs

FROM: Don Hibbard, Administrator  
Historic Preservation Division

SUBJECT: Amend Existing Permit to Allow the Conversion of the Use  
of Buildings at Paradise Park for General Office and  
Retail Space (File No. OA-30A)  
Manoa, Kona, O'ahu  
TMK: 2-9-54:007, 018

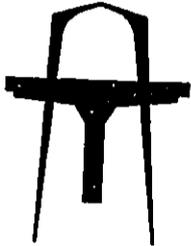
A review of our records shows that there are no known historic sites at the project location, although the Manoa Agricultural site area (State Site 50-80-14-3953) is located c. 1250 feet west of the parking lot facility. The project proposes re-use of existing facilities without additions/extensions or new building construction. Since an approved permit will not authorize any ground disturbing activities, we believe that this project will have "no effect" on historic sites.

EJ:jk

200-

April 3, 1995

**WILSON**  
**OKAMOTO**  
**& ASSOCIATES, INC.**



**ENGINEERS**  
**ARCHITECTS**  
**PLANNERS**

1907 S. BERETANIA STREET  
HONOLULU, HAWAII 96826  
PH: (808) 946-2277  
FAX: (808) 946-2253

Mailing address:  
P. O. Box 3530  
Honolulu, Hawaii 96811

Mr. Don Hibbard, Administrator  
State Historic Preservation Division  
Department of Land and Natural Resources  
33 South King Street, 6th Floor  
Honolulu, Hawaii 96813

Dear Mr. Hibbard:

Subject: Paradise Park Request to Amend Existing  
Conservation District Use  
Manoa, Oahu

Thank you for your comments of December 29, 1994 on the subject Conservation District Use Application (CDUA). The Draft Environmental Assessment (EA) accompanying the CDUA has since been withdrawn and we have prepared and filed a Revised Draft EA that more clearly discusses the proposed action.

We appreciate your confirmation that there are no known historic sites at the project location and that the Manoa Agricultural site area (State Site 50-80-14-3953) is located approximately 1,250 west of the parking lot facility. We also confirm that there will be no new structures.

We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,

Earl Matsukawa  
Project Manager

EK/ak

cc: Darryl Wong, Paradise Park, Inc.  
Kerry Komatsubara, Furutani, Sato and Komatsubara  
Cathy Tilton, Office of Conservation and Environmental Affairs

Benjamin J. Cayetano  
GOVERNOR OF HAWAII



AQUACULTURE DEVELOPMENT PROGRAM  
AQUATIC RESOURCES CONSERVATION AND ENVIRONMENTAL AFFAIRS  
CONSERVATION AND RESOURCES ENFORCEMENT CONVEYANCES  
FORESTRY AND WILDLIFE HISTORIC PRESERVATION PROGRAM  
LAND MANAGEMENT STATE PARKS  
WATER AND LAND DEVELOPMENT

RECEIVED  
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DLNR  
OCEA

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

LM:JD

FILE NO.: OA-30A

MEMORANDUM

JAN -6 1995

TO: Roger C. Evans, Administrator  
Office of Conservation and Environmental Affairs

FROM: *Cecil Santos*  
Cecil Santos, Land Agent  
Division of Land Management

SUBJECT: Conservation District Use Application

The Oahu District Office of Land Management comments that:

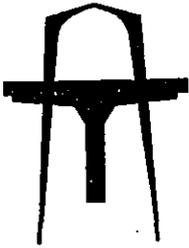
- 1) The applicant comply with their statement under summary of Proposed Use that "No new structures are proposed to be built in conjunction with the changes sought in this application." Should any new structures be built the Conservation District Use Permit (CDUP) be rendered null and void.
- 2) Should additional traffic to and from the Park area be anticipated, the Department of Transportation of the City & County of Honolulu be given opportunity to comment on the project as the access road is extremely narrow.
- 3) Educational activities be promoted for use in the area for schools, civic groups and eleemosynary organizations.
- 4) If General Office Use, does not mean office space for companies operating or concessions at the park, then this General Office space for non-park related business operations does not appear to be in concert with the original intent of issuing the first CDUP permit. It appears that it won't be amending the original CDUP but a request for approval on a separate and new CDUP. This won't be in accordance with protecting conservation areas if the State allows non-forestry and non-natural area related businesses to operate in this area.
- 5) The applicant obtain the required Federal, State and County permits prior to initiating the proposed work.

Should you have any questions, please call John Dooling at 587-0433.

117

April 3, 1995

**WILSON  
OKAMOTO**  
& ASSOCIATES, INC.



ENGINEERS  
ARCHITECTS  
PLANNERS

1907 S. BERETANIA STREET  
HONOLULU, HAWAII 96826  
PH: (808) 946-2277  
FAX: (808) 946-2253

Mailing address:  
P. O. Box 3530  
Honolulu, Hawaii 96811

Mr. Cecil Santos, Land Agent  
Division of Land Management  
Department of Land and Natural Resources  
P.O. Box 621  
Honolulu, Hawaii 96809

Dear Mr. Santos:

Subject: Paradise Park Request to Amend Existing  
Conservation District Use  
Manoa, Oahu

Thank you for your comments of January 6, 1995 on the subject Conservation District Use Application (CDUA). The Draft Environmental Assessment (EA) accompanying the CDUA has since been withdrawn and we have prepared and filed a Revised Draft EA that more clearly discusses the proposed action. We offer the following responses to your comments, based on the Revised Draft EA:

1. We acknowledge that no new structures are proposed for construction.
2. The relatively small increase in office and retail use may correspondingly increase associated traffic. By the same reasoning however, the conversion would also reduce traffic otherwise associated with the exhibition space. Based on the proposed categories of tenants to be considered for the office space, the impacts on traffic will likely be significantly less than when the park was operated as a visitor attraction.
3. Continued operation of the existing zoological/botanical gardens is anticipated to emphasize educational activities, particularly if tenants with that focus can be secured.
4. The Draft EA specifies the types of tenants to be considered for the facility. Such tenants include those involved in the protection or enhancement of the environment, those involved in research and development in zoological and botanical sciences, educational entities, community non-profit organizations and/or other organizations and businesses ancillary to Paradise Park's botanical and zoological gardens and tenants.

**WILSON  
OKAMOTO  
& ASSOCIATES, INC.**

April 3, 1995  
Mr. Cecil Santos  
Page 2

5. All required State and County approvals will be obtained prior to implementing the proposed use change.

We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Earl Matsukawa  
Project Manager

EM/ak

cc: Darryl Wong, Paradise Park, Inc.  
Kerry Komatsubara, Furutani, Sato and Komatsubara  
Cathy Tilton, Office of Conservation and Environmental Affairs

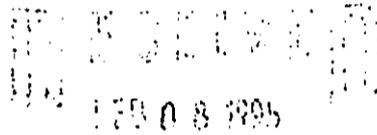


## University of Hawai'i at Mānoa

Environmental Center  
A Unit of Water Resources Research Center  
Crawford 317 • 2550 Campus Road • Honolulu, Hawai'i 96822  
Telephone: (808) 956-7361 • Facsimile: (808) 956-3980

February 7, 1995  
EA:0101

Ms. Cathy Tilton  
Department of Land and Natural Resources  
Office of Conservation and Environmental Affairs  
1151 Punchbowl Street  
Honolulu, Hawaii 96813



Dear Ms. Tilton:

Draft Environmental Assessment  
Paradise Park Use Change  
Manoa, Oahu

The owner of Paradise Park proposes to sublease some or all of the buildings to one or more tenants for general office and/or retail use. Improvements to the Paradise Park buildings will consist primarily of interior modifications.

We have reviewed the Draft Environmental Assessment (EA) with the assistance of Karl Kim, Urban and Regional Planning; and Paul Berkowitz of the Environmental Center.

Inappropriate Land Use

The proposed land use changes to Paradise Park seem highly inappropriate in light of the area's Conservation District status. The applicant offers no justification for establishing essentially urban use in the Conservation District. Under the significance criteria set forth in Section 11-200-12 of the Hawaii Administrative Rules, any action which "conflicts with the state's long-term environmental policies or goals and guidelines" requires an Environmental Impact Statement (EIS). It is difficult to see how this proposal, which seeks to develop office space within a Conservation District, could possibly conform to the State's environmental goals. If this project were permitted, it might set a dangerous precedent for new land uses in Conservation Districts.

Ms. Cathy Tilton  
February 3, 1995  
Page 2

### Unresolved Issues

In order to conduct an effective environmental assessment, one must have a detailed understanding of the project. In this case, the necessary information seems to be lacking. The applicant contests that the sublessee(s) will require primarily interior modifications to the buildings, but how can this be known without knowing anything about the sublessee(s)? It is also stated that the sublessee(s) will employ about 100 people, and that noise levels from the businesses will be low. Once again these conclusions seem premature without knowing what type of businesses will occupy the space.

In terms of infrastructure and utilities, the applicant simply states that the Board of Water Supply will provide water, while Hawaiian Electric will supply electricity. How much water will be required? How adequate are the existing over-head power lines? The assessment also fails to mention anything concerning the adequacy of existing telephone lines. In short, the applicant has assessed future water, power, and communication demands to be significantly lower than the former Paradise Park demands; however it is difficult to see how any of this can be justified without knowing what businesses will replace Paradise Park.

### Social Impacts

This EA seems to overlook the social impacts of the project. Have the neighbors been contacted to see if they approve of the project? What are the potential benefits to the community? What are the ramifications of creating office and retail space in a quiet neighborhood? According to the Hawaii Administrative Rules, if a project "substantially affects the economic or social welfare of the community", then an EIS must be prepared. This project certainly seems to have the potential to do so.

### Traffic Impacts

Similar inadequacies in this document exist with respect to the impacts on traffic and parking. How much parking will be needed? How could the applicant estimate the volume of traffic without knowing what type of businesses will occupy the Park? The number of vehicular trips generated depends on the character of the businesses, the activities of the employees, and the number of customers. All of these factors are unknown! Furthermore this study fails to consider intersection traffic altogether.

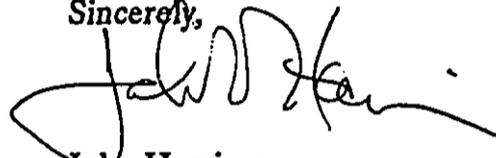
Ms. Cathy Tilton  
February 3, 1995  
Page 3

Conclusion

In summary, we recommend that an EIS be prepared for several reasons. First of all, the proposed land use change within a Conservation District seems to conflict with the State's environmental policies. Second, the project may have significant impacts in terms of traffic and social welfare. Finally, in terms of noise levels, water demand, electricity requirements, and communications, the current document is too brief and highly speculative.

Thank you for the opportunity to review this Draft EA.

Sincerely,

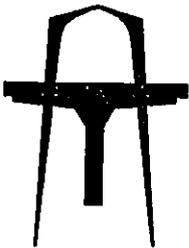


John Harrison  
Environmental Coordinator

cc: OEQC  
Paradise Park, Inc.  
✓Wilson Okamoto and Associates, Inc.  
Roger Fujioka  
Karl Kim  
Paul Berkowitz

April 3, 1995

**WILSON  
OKAMOTO  
& ASSOCIATES, INC.**



**ENGINEERS  
ARCHITECTS  
PLANNERS**

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FAX: (808) 946-2253

Mailing address:  
P. O. Box 3530  
Honolulu, Hawaii 96811

John Harrison, Ph.D.  
Environmental Center  
Crawford 317  
2550 Campus Road  
Honolulu, Hawaii 96822

Dear Dr. Harrison:

Subject: Paradise Park Use Change  
Draft Environmental Assessment (EA)  
Manoa, Oahu

Thank you for your letter of February 7, 1995 commenting on the Draft EA for the Paradise Park Use Change. That Draft EA has since been withdrawn and we have prepared and filed a Revised Draft EA that more clearly discusses the proposed action. We offer the following responses to your comments, based on the Revised Draft EA:

1. Inappropriate Land Use

No new land uses are proposed at Paradise Park under the current CDUA amendment. Office, retail and exhibit areas are already allowed under the CDUA as ancillary uses to the zoological/botanical garden. As discussed in the Revised Draft EA, what is proposed is a conversion of a limited amount of existing exhibit space to accommodate office and retail use. If the future tenant decides to maintain the spaces in exhibit use, then no conversion will be required. The relationship of any new uses to the zoological/botanical garden would be maintained since the tenant must meet certain qualifications associated with the garden.

2. Unresolved Issues

The proposed conversion of exhibit space to office or retail use will involve modifications of interior spaces to fit tenants' needs. No new structures or additions creating more floor area are proposed or will be allowed under this CDUA amendment. The exteriors of buildings may be modified to the extent dictated by interior modifications such as the addition or removal of windows or doors.

With respect to noise, office and retail uses are generally not considered noisy uses. In any event, all such uses are governed by applicable State and County noise standards.

3. Social Impacts

Inasmuch as any new uses will continue to maintain a relationship to the existing zoological/botanical garden, no exacerbation of adverse

**WILSON**  
**OKAMOTO**

**& ASSOCIATES, INC.**

April 3, 1995  
John Harrison, Ph.D  
Page 2

social impacts are anticipated relative to the currently approved use of the site as a visitor attraction.

4. Traffic Impacts

The Revised EA includes a traffic assessment associated with the converted space. The number of vehicle trips for retail and office uses are based on standards established in the Trip Generation Handbook, 5th Edition, by the Institute of Transportation Engineers.

We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Earl Matsukawa  
Project Manager

EM/ak

cc: Darryl Wong, Paradise Park, Inc.  
Kerry Komatsubara, Furutani, Sato and Komatsubara  
Cathy Tilton, Office of Conservation and Environmental Affairs

OA-30A

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU

630 SOUTH BERETANIA STREET

HONOLULU, HAWAII 96843



January 23, 1995

JEREMY HARRIS, Mayor

WALTER O WATSON, JR Chairman  
MAURICE H YAMASATO Vice Chairman  
SISTER M. DAVILYN AH CHICK, OSF

MELISSA Y J LUM  
FORREST C MURPHY  
KENNETH E SPRAGUE

RAYMOND H. SATO, Acting  
Manager and Chief Engineer

Mr. Michael Wilson, Chairperson  
Department of Land and Natural Resources  
State of Hawaii  
P. O. Box 621  
Honolulu, Hawaii 96809

Attention: Ms. Cathy Tilton

Dear Mr. Wilson:

Subject: Letter of December 21, 1994 Regarding Conservation District Use  
Permit OA-30 at Paradise Park, Honolulu, Hawaii, TMK: 2-9-54: 7 and 18

*Handwritten initials/signature*

DLWR  
OCEA

95 JAN 31 AM 9:33

Thank you for the opportunity to review and comment on Conservation District Use Permit, OA-30, at Paradise Park. We have the following comments to offer:

1. There are two existing meters, a 6-inch fire and a 2-inch domestic, serving the project site.
2. The fire protection in the vicinity of the proposed development does not meet the requirements of our water system standards. Our standards require a flow of 2,000 gallons per minute (gpm) for commercial developments. The existing water system can only provide a flow of approximately 1,000 gpm. The developer will be required to install the necessary water system improvements to upgrade the fire protection in accordance with our standards.
3. The availability of water will be confirmed when the building permit application is submitted for our review and approval. When the water is made available, the applicant will be required to pay our Water System Facilities Charges for resource development, transmission, and daily storage.
4. If a three-inch or larger meter is required, the construction drawings should be submitted for our review and approval.

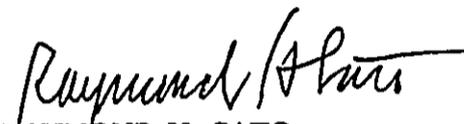


Mr. Michael Wilson  
Page 2  
January 23, 1995

5. The on-site fire protection requirements should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.
6. Board of Water Supply approved reduced pressure principle backflow prevention assemblies will be required immediately after all existing and proposed domestic meters serving the property.

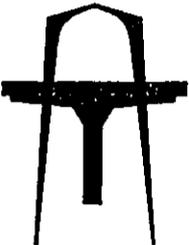
If you have any questions, please contact Barry Usagawa at 527-5235.

Very truly yours,

  
RAYMOND H. SATO  
Acting Manager and Chief Engineer

April 3, 1995

**WILSON  
OKAMOTO**  
& ASSOCIATES, INC.



**ENGINEERS  
ARCHITECTS  
PLANNERS**

1907 S. BERETANIA STREET  
HONOLULU, HAWAII 96826  
PH: (808) 946-2277  
FAX: (808) 946-2253

Mailing address:  
P. O. Box 3530  
Honolulu, Hawaii 96811

Mr. Raymond H. Sato, Manager and Chief Engineer  
Board of Water Supply  
630 South Beretania Street  
Honolulu, Hawaii 96843

Dear Mr. Sato:

Subject: Paradise Park Request to Amend Existing  
Conservation District Use  
Paradise Park Use Change  
Draft Environmental Assessment (EA)  
Manoa, Oahu

Thank you for your comments of January 23, 1995 on the subject  
Conservation District Use Application (CDUA). We offer the  
following responses to your comments

1. We appreciate your confirmation of water meters currently serving the park.
2. Your determination of water system requirements for fire protection is noted. We will pursue efforts to assure that adequate fire protection is provided.
3. We acknowledge that water availability will be confirmed when the building permit application is submitted for your review and approval and that a Water System Facilities Charge will be assessed.
4. We will comply with requirements for construction drawing review and approval by your department.
5. On-site fire protection requirements shall be coordinated with the Fire Department.
6. Requirements for reduced pressure backflow prevention assemblies will be complied with.

**WILSON**  
**OKAMOTO**  
**& ASSOCIATES, INC.**

April 3, 1995  
Mr. Raymond H. Sato  
Page 2

We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Earl Matsukawa  
Project Manager

EM/ak

cc: Darryl Wong, Paradise Park, Inc.  
Kerry Komatsubara, Furutani, Sato and Komatsubara  
Cathy Tilton, Office of Conservation and Environmental Affairs

DEPARTMENT OF LAND UTILIZATION  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET  
HONOLULU, HAWAII 96813 • (808) 523-4432

011-3011

'95 JAN 6 AM 8:21

JEREMY HARRIS  
MAYOR



DLNR  
OCEA

LORETTA K.C. CHEE  
Acting Director  
94-09065 (ASK)

January 4, 1995

The Honorable Michael D. Wilson, Director  
Department of Land and  
Natural Resources  
State of Hawaii  
Kalanimoku Building  
1151 Punchbowl Street, Room 130  
Honolulu, Hawaii 96813

Dear Mr. Wilson:

Special Management Area Review

Tax Map Key : 2-9-54: 7 & 18  
Type of Project: To amend Conservation District Use  
Permit OA-30 at Paradise Park

The proposed project on the referenced tax map key has been reviewed. We find that it:

- Is not within the Special Management Area.
- Is within the Special Management Area, but is not defined as "development" and is therefore, exempt (Section 25-1.3 [2][ ], Chapter 25, Revised Ordinances of Honolulu).

Should you have any questions, please contact the Environmental Review Branch at 523-4077.

Very truly yours,

*Loretta K.C. Chee*  
LORETTA K.C. CHEE  
Acting Director of Land Utilization

LKCC:am  
g:94-09065.ask

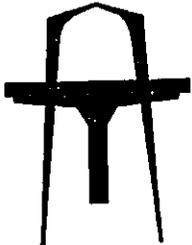
DEPARTMENT OF LAND & NATURAL RESOURCES  
STATE OF HAWAII

95 JAN 5 AM 11:41

RECEIVED

April 3, 1995

**WILSON  
OKAMOTO**  
& ASSOCIATES, INC.



ENGINEERS  
ARCHITECTS  
PLANNERS

1907 S. BERETANIA STREET  
HONOLULU, HAWAII 96826  
PH: (808) 946-2277  
FAX: (808) 946-2253

Mailing address:  
P. O. Box 3530  
Honolulu, Hawaii 96811

Ms. Loretta K.C. Chee, Deputy Director  
Department of Land Utilization  
650 South King Street  
Honolulu, Hawaii 96813

Dear Ms. Chee:

Subject: Paradise Park Request to Amend Existing  
Conservation District Use  
Manoa, Oahu

Thank you for your letter of January 4, 1995 confirming that the proposed project site is outside of the City and County's Special Management Area. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,

Earl Matsukawa  
Project Manager

EM/ak

cc: Darryl Wong, Paradise Park, Inc.  
Kerry Komatsubara, Furutani, Sato and Komatsubara  
Cathy Tilton, Office of Conservation and Environmental Affairs

DC.E.A

OA-30A

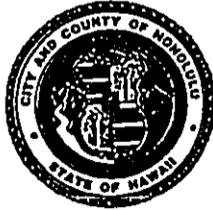
PLANNING DEPARTMENT  
**CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET  
HONOLULU, HAWAII 96813

'95 JAN 19 PM 3:55

**JEREMY HARRIS**  
MAYOR

DLNR  
OCEA



**CHERYL D. SOON**  
ACTING CHIEF PLANNING OFFICER  
**CAROLL TAKAHASHI**  
DEPUTY CHIEF PLANNING OFFICER

LW 12/94-4731

January 13, 1995

Honorable Michael D. Wilson, Chairperson  
Board of Land and Natural Resources  
Department of Land and Natural Resources  
State of Hawaii  
P.O. Box 621  
Honolulu, Hawaii 96809

DEPT. OF LAND  
& NATURAL RESOURCES  
STATE OF HAWAII

95 JAN 18 A 9: 09

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Dear Mr. Wilson:

Request to Amend Conservation District Use  
Permit #OA-30 for Paradise Park, Oahu

We have reviewed the subject application and have the following comments:

The subject site is designated as Preservation on the Primary Urban Center Development Plan Land Use Map. In general, such lands are deemed important to protect watershed areas and natural resources, and permitted uses within such areas are limited to recreational and low-intensity uses with low-density accessory structures. Although the proposed improvements are limited to the interior of existing buildings, a change from a park operation to general office and retail uses would imply more urbanized use. We feel that expansion of urban uses within Preservation-designated lands should be discouraged.

As noted in the Notice of Environmental Determination, the Environmental Assessment lacks specific information regarding the proposed numbers and types of office and retail uses to adequately assess the potential impact of the proposed project. Apart from impact on public facilities and traffic, these would include impact on the surrounding area and whether or not it is compatible with the purpose of the Conservation District and with adjacent developed properties.

Honorable Michael D. Wilson, Chairperson  
Board of Land and Natural Resources  
Department of Land and Natural Resources  
January 13, 1995  
Page 2

Thank you for the opportunity to comment on this matter. Should you have any questions, please contact Lin Wong of our staff at 523-4485.

Sincerely,

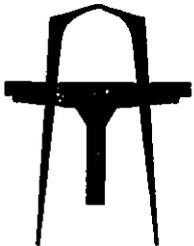
*Cesell Takahashi for  
Cheryl Soon*

CHERYL D. SOON  
Acting Chief Planning Officer

CDS:ft

April 3, 1995

**WILSON**  
**OKAMOTO**  
**& ASSOCIATES, INC.**



**ENGINEERS**  
**ARCHITECTS**  
**PLANNERS**

1907 S. BERETANIA STREET  
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PH: (808) 946-2277  
FAX: (808) 946-2253

Mailing address:  
P. O. Box 3530  
Honolulu, Hawaii 96811

Ms. Cheryl D. Soon, Chief Planning Officer  
Planning Department  
650 South King Street  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Subject: Paradise Park Request to Amend Existing  
Conservation District Use  
Manoa, Oahu

Thank you for your letter of January 13, 1995 commenting on the subject Conservation District Use Application (CDUA). The Draft Environmental Assessment (EA) accompanying the CDUA has since been withdrawn and we have prepared and filed a Revised Draft EA that more clearly discusses the proposed action. We offer the following responses to your comments, based on the Revised Draft EA:

1. Operation of the zoological/botanical garden will continue under the current proposal as will office and retail uses in existing buildings, although the tenants may be different. The proposed change in use would convert a limited amount of existing exhibition space into office and retail use.
2. The Draft EA specifies the types of tenants to be considered for the facility. Such tenants include those involved in the protection or enhancement of the environment, those involved in research and development in zoological and botanical sciences, educational entities, community non-profit organizations and/or other organizations and businesses ancillary to Paradise Park's botanical and zoological gardens and tenants. We believe that by limiting the types of tenants to be considered for the office/retail space, compatibility with the Conservation District can be maintained.

WILSON  
OKAMOTO  
& ASSOCIATES, INC.

April 3, 1995  
Ms. Cheryl D. Soon  
Page 2

We appreciate your interest and participation in the consultation phase of the environmental review process.

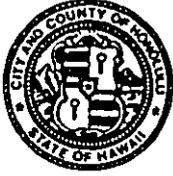
Sincerely,



Earl Matsukawa  
Project Manager

EM/ak

cc: Darryl Wong, Paradise Park, Inc.  
Kerry Komatsubara, Furutani, Sato and Komatsubara  
Cathy Tilton, Office of Conservation and Environmental Affairs



MANOA NEIGHBORHOOD BOARD NO. 7

c/o MANOA LIBRARY • 2716 WOODLAWN DRIVE • HONOLULU, HAWAII 96822

February 6, 1995

Department of Land and Natural Resources  
Office of Conservation and Environmental Affairs  
State of Hawaii  
1151 Punchbowl Street  
Honolulu, Hawaii 96813

RECEIVED  
FEB 07 1995

WILSON OKAMOTO & ASSOCIATES, INC.

Attention: Cathy Tilton 587-0377

Re: Paradise Park Use Change District: Honolulu  
Tax Map Key: 2-9-54: 7 & 18  
Comments on the Draft Environmental Assessment  
Dated December 1994

Dear Ms. Tilton:

This letter contains a summary of concerns regarding the Draft Environmental Assessment (DEA) for Paradise Park, Inc. prepared by Wilson Okamoto & Associates, Inc. and dated December 1994.

The DEA document has been reviewed by members of the Manoa Neighborhood Board and this letter was unanimously approved by the Board at its regular meeting of February 1, 1995.

Given the long-standing concerns of the Manoa community with respect to Paradise Park; the significance of the proposed changes for both the use of Paradise Park itself and the possible impacts on the broader policies concerning commercial uses of conservation district lands and resources; and the fact that the applicant has retained the services of a professional consultant for the preparation of this DEA, the Manoa Neighborhood Board is both surprised and disappointed by the gross inadequacy of the DEA.

Much of the document reads as if written by "boiler plate." There is little description of the proposed changes in use, nor discussion of the likely impacts of these changes. The description of the affected environment is incomplete. In addition to not describing the physical characteristics of the site, there is no discussion of plant and animal life in the area, nor mention of the native or introduced species which could be affected by this use change. In its present form, the DEA serves to raise the level of uncertainty and concern as to the project's environmental impacts. We do not see how a "negative declaration" determination can be justified on the basis of this document.



Oahu's Neighborhood Board System - Established 1973

One of our principal objections to the DEA is the lack of detail on the proposed uses. While there is some vague language concerning the types of businesses which would be given subleases, there is no discussion of how many, how large, and what requirements (electricity, telephone, water, sewerage, parking, etc.) would be generated. Additionally, what, if any, new construction is needed and what will be done to mitigate the associated impacts?

Traffic is also a significant impact which is not adequately addressed in the DEA. How much traffic will be generated by the proposed change in use? How will traffic patterns vary during peak and off-peak hours? What travel modes will be utilized and what is the breakdown in terms of private automobile, public bus, tour bus, and alternative modes of travel (bicycle, moped, walking, etc.)? What impacts are likely to result from the increase in traffic? How much additional noise, vibration, air pollution, and congestion will result from the change in use? What will be the likely impacts in terms of additional traffic accidents in the valley? What will be the cumulative impact of this use change on traffic in the entire valley? How much additional traffic will be generated between Paradise Park and other generators (e.g., Manoa Marketplace, the University of Hawaii at Manoa, etc.) in the district? There are standard techniques for estimating travel demand, mode choice, and roadway impacts, none of which appear to have been utilized.

Another concern regards the socio-economic impacts of the proposed use change. There is no discussion of benefits in terms of job creation or discussion of where the employees will come from. What percentage of the employees and businesses are expected to come from Manoa? If employees and businesses come from outside Manoa, what will be the impacts of the use change on housing demand in the surrounding community and the resultant impacts on local schools and other services? Are there adequate labor supplies to meet the needs of the proposed businesses? Is there a shortage of similar retail and office space to suggest that a use change is justified? Who will benefit from the jobs and income generated from this project? How much additional tax revenue will be generated for the state and local government? What will be the impact on surrounding property values? What will be the local economic impacts, both positive and negative, from this use change?

Paradise Park Use Change  
Draft Environmental Assessment Comments  
Manoa Neighborhood Board No. 7  
February 6, 1995

3

A number of initiatives have emerged in Manoa to preserve, protect, and enhance not just environmental quality, but also the unique character of the valley. There are many historic properties and views that give Manoa a strong "sense of place." What will be the impact of the use change on the overall "sense of place" of Manoa Valley -- the residential and green forest reserve character of the valley, especially in that most mauka area in which Paradise Park and Lyon Arboretum are situated? Related to this concern is discussion of nonconformity to existing land use plans and policies, which is conspicuously absent from this DEA.

It is our contention, moreover, that this particular decision may have significant implications beyond Manoa Valley. While we have expressed concerns from the perspective of residents of this district, there are larger issues concerning appropriate uses within conservation districts. It would therefore be prudent to fully consider the environmental impacts of this significant use change. We recommend that the applicant be required to prepare an environmental impact statement (EIS) and adhere more closely to both the spirit and the letter of the law (Hawaii Revised Statutes, Chapter 343).

The statement at page ii of the DEA that "no significant impacts are anticipated" is unsupported and grossly inadequate due to the lack of information and discussion in the document as a whole. We are of the opinion that a negative declaration determination should not be issued based on the DEA as submitted to the Department of Land and Natural Resources (DLNR).

Further, at such time that a public hearing is held on the applicant's Conservation District Use Application (CDUA) amendment application, it is the unanimous position of the Manoa Neighborhood Board that the hearing be scheduled at a time and place within Manoa Valley convenient to the public, e.g., a Wednesday at 7:00 PM at the Noelani Elementary School cafeteria (2655 Woodlawn Drive), as was done for the October 1991 DLNR public hearing on Paradise Park's plan to install dinosaur exhibits and mazes.

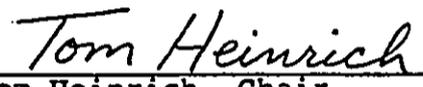
Thank you for this opportunity to comment on the Draft Environmental Assessment, and for your thorough consideration of the issues raised by the Manoa Neighborhood Board's review.

Paradise Park Use Change  
Draft Environmental Assessment Comments  
Manoa Neighborhood Board No. 7  
February 6, 1995

4

Sincerely,

  
Karl Kim, Co-Chair  
  
John McLaren, Co-Chair  
Planning and Transportation Committee

  
Tom Heinrich, Chair  
Manoa Neighborhood Board No. 7

cc:

Paradise Park, Inc.  
1035 University Avenue, Suite 201  
Honolulu, Hawaii 96826  
Attention: James Wong, President

Wilson Okamoto & Associates, Inc.  
1907 South Beretania Street, Suite 400  
Honolulu, Hawaii 96826  
Attention: Earl Matsukawa, Project Manager

Mr. Gary Gill, Director  
Office of Environmental Quality Control  
220 South King Street, 4th Floor  
Honolulu, Hawaii 96813

Senator Brian Taniguchi  
State Office Tower, Room 510  
235 South Beretania Street  
Honolulu, Hawaii 96813

Representative Ed Case  
State Office Tower, Room 1210  
235 South Beretania Street  
Honolulu, Hawaii 96813

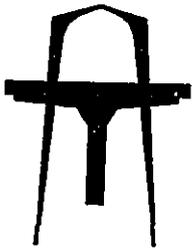
Councilmember Andy Mirikitani  
City & County of Honolulu  
530 South King Street  
Honolulu, Hawaii 96813

Ms. Ann Kobayashi  
Special Assistant to the Mayor  
City & County of Honolulu  
530 South King Street  
Honolulu, Hawaii 96813

President Mary Cooke  
Malama o Manoa  
P. O. Box 61961  
Honolulu, Hawaii 96839

April 3, 1995

**WILSON  
OKAMOTO**  
& ASSOCIATES, INC.



ENGINEERS  
ARCHITECTS  
PLANNERS

1907 S. BERETANIA STREET  
HONOLULU, HAWAII 96826  
PH: (808) 946-2277  
FAX: (808) 946-2253

Mailing address:  
P. O. Box 3530  
Honolulu, Hawaii 96811

Mr. Tom Heinrich, Chair  
Manoa Neighborhood Board No. 7  
c/o Manoa Library  
2716 Woodlawn Drive  
Honolulu, Hawaii 96822

Dear Mr. Heinrich:

Subject: Paradise Park Use Change  
Draft Environmental Assessment (EA)  
Manoa, Oahu

Thank you for your letter of February 6, 1995 commenting on the Draft EA for Paradise Park Use Change. That Draft EA has since been withdrawn and we have prepared and filed a Revised Draft EA that more clearly discusses the proposed action. We offer the following responses to your comments, based on the Revised Draft EA:

1. Plant and animal life are not inventoried since the existing zoological/ botanical garden use will be continued. Only the use of two specific interior spaces are proposed to be changed from exhibit to retail or office use.
2. The Revised EA discusses in greater detail the proposed change in use. The conversion of a limited amount of existing interior space is not anticipated to increase demand for utility services or parking.
3. The Revised EA includes a traffic assessment associated with the converted space. The number of vehicle trips for retail and office uses are based on standards established in the Trip Generation Handbook, 5th Edition, by the Institute of Transportation Engineers. Given the limited amount of floor space to be converted in use (as opposed to the creation of new floor area), a detailed traffic impact assessment is not warranted. Similarly, the increase in vehicular emissions and noise for the associated automobile traffic would be negligible.

**WILSON  
OKAMOTO  
& ASSOCIATES, INC.**

April 3, 1995  
Mr. Tom Heinrich  
Page 2

4. Again, the conversion of a limited amount of floor area to retail and office use is not anticipated to have significant local economic impacts. The conversion will not necessarily create new jobs. Instead, it will provide a new location for jobs that would otherwise be located elsewhere, probably within Honolulu.
5. No change in the overall character of Manoa valley is anticipated. The proposed conversion in use will only affect the interiors of existing structures. No new structures are proposed. The Revised EA includes a discussion of the proposal with respect to current zoning.
6. The Revised EA provides further clarification as to the scale of the proposed revisions with respect to impacts on the environment. On this basis, we believe that a negative declaration is appropriate.

We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Earl Matsukawa  
Project Manager

EM/ak

cc: Darryl Wong, Paradise Park, Inc.  
Kerry Komatsubara, Furutani, Sato and Komatsubara  
Cathy Tilton, Office of Conservation and Environmental Affairs

3281 Manoa Road  
Honolulu, Hawaii 96822

February 3, 1995

Department of Land and Natural Resources  
Office of Conservation and Environmental Affairs  
1151 Punchbowl Street  
Honolulu, Hawaii 96813

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Attention: Cathy Tilton

Gentlemen:

Reference is made to the enclosed proposal to convert the Paradise Park buildings and structures to commercial office and retail store space.

In 1966, the Board of Land and Natural Resources approved Conservation District Use Application OA-30 for Paradise Park. The approval was granted on the basis that Paradise Park would establish a zoological and botanical garden for "recreational purposes."

The zoological and botanical garden has dwindled down to an extent that it is more apparent than real. Therefore, the proposal should be considered as a request to change the principal mission of Paradise Park -- from "recreational purposes" to a commercial office space and retail store complex.

Per paragraph C(1) of Section 2, Board Regulation Number 4 -- "Any and all uses permitted within the "GU" Conservation Subzone shall, without exception, be subject to the following conditions:

- (1) The use shall be compatible with the locality and surrounding areas, and appropriate to the physical conditions and capabilities of the specific parcel and/or parcels of land."

The quoted condition should be enforced in this case because a commercial office space and retail store complex would be out of character with the residential areas in upper Manoa Valley.

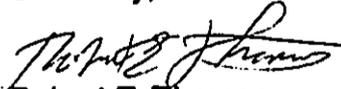
If the proposal is approved --

Paradise Park will be unique in that it will be the only commercial office space and retail store complex permitted to operate in a tropical rain forest.

There will be a significant increase in the number of delivery trucks, buses,

vans, and automobiles carrying supplies, employees, and customers to the offices and stores. The increased vehicular traffic will have an adverse effect on the peace and tranquillity of the quiet neighborhood.

Sincerely,

  
Robert E. Thomas

Enclosure: Paradise Park Use Change

Copy to:

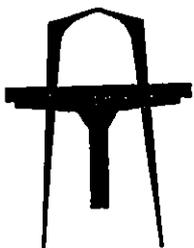
Office of Environmental Quality Control  
220 South King Street, Suite 400  
Honolulu, Hawaii 96813

Paradise Park, Inc.  
1035 University Avenue, Suite 201  
Honolulu, Hawaii 96826  
Attention: James Wong

✓ Wilson Okamoto and Associates, Inc.  
1907 South Beretania Street, Suite 400  
Honolulu, Hawaii 96826  
Attention: Earl Matsukawa

April 3, 1995

**WILSON  
OKAMOTO**  
& ASSOCIATES, INC.



ENGINEERS  
ARCHITECTS  
PLANNERS

1907 S. BERETANIA STREET  
HONOLULU, HAWAII 96826  
PH: (808) 946-2277  
FAX: (808) 946-2253

Mailing address:  
P. O. Box 3530  
Honolulu, Hawaii 96811

Mr. Robert E. Thomas  
3281 Manoa Road  
Honolulu, Hawaii 96822

Dear Mr. Thomas:

Subject: Paradise Park Use Change  
Draft Environmental Assessment (EA)  
Manoa, Oahu

Thank you for your letter of February 3, 1995 commenting on the Draft EA for Paradise Park Use Change. That Draft EA has since been withdrawn and we have prepared and filed a Revised Draft EA that more clearly discusses the proposed action. We offer the following responses to your comments, based on the Revised Draft EA:

1. Operation of the zoological/botanical garden will continue under the current proposal as will office and retail uses in existing buildings, although the tenants may be different. The proposed change in use would convert a limited amount of existing exhibition space into office and retail use.
2. The relatively small increase in office and retail use may correspondingly increase associated traffic. By the same reasoning however, the conversion would also reduce traffic otherwise associated with the exhibition space. Based on the proposed categories of tenants to be considered for the office space, the impacts on traffic will likely be significantly less than when the park was operated as a visitor attraction.

**WILSON**  
**OKAMOTO**  
**& ASSOCIATES, INC.**

April 3, 1995  
Mr. Robert E. Thomas  
Page 2

We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Earl Matsukawa  
Project Manager

EM/ak

cc: Darryl Wong, Paradise Park, Inc.  
Kerry Komatsubara, Furutani, Sato and Komatsubara  
Cathy Tilton, Office of Conservation and Environmental Affairs

February 7, 1995

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95 FEB 7 AM 11:03  
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OCEA

MEMORANDUM

TO: Department of Land and Natural Resources  
Office of Conservation and Environmental Affairs

FROM: Ann H. Kobayashi, <sup>AK</sup> Executive Assistant  
Mayor's Office, City and County of Honolulu

SUBJ: Paradise Park Use Change - TMK: 2-9-54:7 and 18

As the former Senator from the Manoa district, I received many complaints from residents because of traffic and noise generated by Paradise Park. As a long time resident of Manoa, I watched the birth and growth of the Park over the years and sought answers to the following questions.

How was Paradise Park able to obtain approval for a commercial facility on conservation land adjacent to single family residences with the only access being a road through a quiet residential valley?

What was the original purported use of Paradise Park and the underlying reason for granting the use of conservation land?

How has that use changed over the years prior to the opening of Paradise Park until today?

Why was such a broad permit given for use of conservation land?

After years of searching and unsuccessfully receiving any kind of feasible response to the above questions, I must respectfully ask that you deny the application for use change by Paradise Park.

The residents of Manoa Valley have had to endure this facility for too many years -- rock bands, wedding receptions, party noises until 11:00 at night, etc. Our residential community does not want to see any more commercial activity on conservation land in a residential district. Such activity should be confined to the business district in Manoa.

Please help us protect and preserve our neighborhood and the State's conservation lands. Thank you.

Comments and Responses  
for the  
Revised Draft EA

Division of Forestry and Wildlife  
March 2, 1995

OA-?

CT

MEMORANDUM:

TO: Roger C. Evans, OCEA  
FROM: Michael G. Buck, Administrator



SUBJECT: Revised Draft Environmental Assessment for Paradise Parks, Manoa, Honolulu, Oahu; File No. OA-30A.

We have reviewed the above subject matter and have ascertained that the revised environmental assessment has satisfactorily addressed our concerns. We therefore have no objections or reservations to the proposed subject.

cc: Oahu Branch

DIVISION  
OCEA

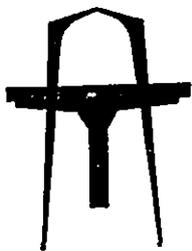
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3332-01  
April 21, 1995

**WILSON**  
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& ASSOCIATES, INC.



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PLANNERS

1907 S. BERETANIA STREET  
HONOLULU, HAWAII 96826  
PH: (808) 946-2277  
FAX: (808) 946-2253

Mailing address:  
P. O. Box 3530  
Honolulu, Hawaii 96811

Mr. Michael G. Buck, Administrator  
Division of Forestry and Wildlife  
Department of Land and Natural Resources  
1151 Punchbowl Street  
Honolulu, Hawaii 96809

Dear Mr. Buck:

Subject: Revised Draft Environmental Assessment (EA)  
for Amendment to Conservation District Use Permit OA-30  
Paradise Park, Manoa, Oahu

Thank you for your letter of March 2, 1995, indicating that the subject Revised Draft EA has addressed your concerns and that you have no objections or reservations to the proposed subject. We appreciated your interest and concern in the consultation phase of the environmental review process.

Sincerely,

Earl Matsukawa  
Project Manager

EM/ak

cc: Darryl Wong, Paradise Park, Inc.  
Kerry Komatsubara, Furutani, Sato and Komatsubara  
Cathy Tilton, Office of Conservation and Environmental Affairs

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APR 11 1995

**University of Hawai'i at Mānoa**

WILSON OKAMOTO & ASSOC., INC.

Environmental Center  
A Unit of Water Resources Research Center  
Crawford 317 • 2550 Campus Road • Honolulu, Hawai'i 96822  
Telephone: (808) 956-7361 • Facsimile: (808) 956-3980

April 6, 1995  
EA:0115

Ms. Cathy Tilton  
Department of Land and Natural Resources  
Office of Conservation and Environmental Affairs  
1151 Punchbowl Street  
Honolulu, Hawaii 96813

Dear Ms. Tilton:

Draft Environmental Assessment  
Paradise Park Conversion of Exhibition Space  
Manoa, Oahu

The owner of Paradise Park proposes to convert up to 6,742 square feet of existing exhibition space in the Main Building and 1,627 square feet of existing space in the Discovery Center to general office and retail use. Tenants would have the right to use existing parking structures, while improvements to the buildings would be limited to interior modifications.

We have reviewed the Draft Environmental Assessment (EA) with the assistance of Karl Kim, Urban and Regional Planning; and Paul Berkowitz of the Environmental Center.

Land Use

The proposed conversion of exhibition space seems well-intentioned, but assurance of these intentions is lacking. Although the proposal discusses five types of organizations which would potentially sublease the space, will permit conditions explicitly limit the subleases to one of these types? Also, it is not clear how much space each of these organizations would need. On the surface, it appears that converted office space would far exceed the demand for space by the listed organizations. For these reasons, we are concerned that the space would be used for more general office and/or retail use, as was outlined in the original proposal.

Ms. Cathy Tilton  
April 6, 1995  
Page 2

Ultimately, we are worried about the appropriateness of an essentially urban use in the Conservation District. Clearly this type of urban use would conflict with the State's environmental policies. Furthermore, pursuant to Section 11-200-12 of the Hawaii Administrative Rules, any action which "conflicts with the State's long-term environmental policies or goals and guidelines" would require an Environmental Impact Statement (EIS). Finally, if essentially urban uses were permitted in the Conservation District, a dangerous precedent more generally might be set for acceptable land uses within the Conservation District.

#### Unresolved Issues

In order to conduct an effective environmental assessment, one must have a detailed understanding of the project. In this case, some of the necessary information seems to be lacking. In terms of infrastructure and utilities, the applicant simply states that the Board of Water Supply will provide water, while Hawaiian Electric will supply electricity. How much water will be required? How adequate are the existing over-head power lines? The assessment also fails to mention anything concerning the adequacy of existing telephone lines. In short, the applicant has assessed future utility demands to be significantly lower than the former Paradise Park demands; however it is difficult to see how any of this can be justified without knowing what organizations will replace Paradise Park.

#### Traffic Impacts

Similar inadequacies exist with respect to the impacts on traffic and parking. How much parking will be needed? How could the applicant estimate the volume of traffic without knowing what type of organizations will occupy Paradise Park? The number of vehicular trips generated depends on the character of the organizations, the activities of the employees, and the number of visitors. It appears as if only employee trips were considered in estimating the number of vehicular trips. The other factors were neglected. Furthermore this study fails to consider intersection traffic altogether.

#### Social Impacts

This EA completely overlooks the social impacts of the project. According to Chapter 343 of the Hawaii Revised Statutes, an environmental assessment should encompass the "effects of a proposed action on the economic and social welfare of the community or State." In terms of content alone, this document clearly fails to meet this requirement. Have the neighbors been contacted to see if they approve of the project? What are the potential benefits to the community? What are the ramifications of creating office and retail space in a quiet neighborhood? According to Section 11-200-12 of the Hawaii

Ms. Cathy Tilton  
April 6, 1995  
Page 3

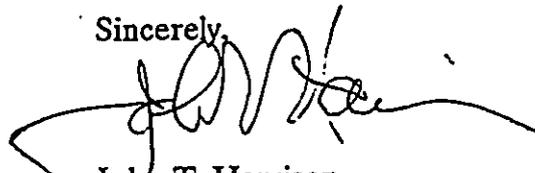
Administrative Rules, if a project "substantially affects the economic or social welfare of the community", then an EIS must be prepared. We are not sure whether the proposed action will significantly affect the community, but the potential effects need to be assessed in this document.

Conclusion

Although additional specifications have been provided in this document, the ultimate end uses remain unclear. Consequently, the proposed land use change within a Conservation District has the potential to conflict with the State's environmental policies, and in addition, the project may have significant impacts in terms of traffic and social welfare. Finally, in terms of demands on utilities, the current document remains speculative and is too brief.

Thank you for the opportunity to review this Draft EA.

Sincerely,

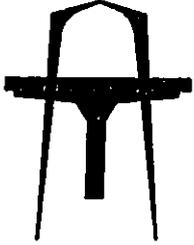


John T. Harrison  
Environmental Coordinator

cc: OEQC  
Paradise Park, Inc.  
Wilson Okamoto and Associates, Inc. ✓  
Roger Fujioka  
Karl Kim  
Paul Berkowitz

3332-01  
April 21, 1995

**WILSON  
OKAMOTO  
& ASSOCIATES, INC.**



ENGINEERS  
ARCHITECTS  
PLANNERS

1907 S. BERETANIA STREET  
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PH: (808) 946-2277  
FAX: (808) 946-2253

Mailing address:  
P. O. Box 3530  
Honolulu, Hawaii 96811

John Harrison, Ph.D.  
Environmental Center  
Crawford 317  
2550 Campus Road  
Honolulu, Hawaii 96822

Dear Dr. Harrison:

Subject: Paradise Park Use Change  
Revised Draft Environmental Assessment (EA)  
Manoa, Oahu

Thank you for your letter of February 7, 1995 commenting on the Revised Draft EA for the Paradise Park Use Change.

We offer the following responses to your comments:

Land Use

The conversion of 8,369 square feet of exhibit space to office use is a maximum limit to provide flexibility in accommodating potential office tenants. If the additional office space is not required, the space could remain in exhibit use in conjunction with the botanical and zoological gardens.

Tenants to be considered must fit in one or more of the five categories discussed. Conditions on the CDUA to enforce this requirement are anticipated, but the final decision is up to the Board of Land and Natural Resources.

Your concerns regarding accommodation of the proposed use are appropriate for the forthcoming CDUA deliberations.

Unresolved Issues

We do not agree that detailed utility needs for such as small change in building usage is a critical issue in an environmental assessment. Utility demands are routinely based on the square footage devoted to a particular type of use, such as office or retail use, as opposed to the needs of a specific user. For example, it would be unreasonable for the developer of a major shopping complex to determine utility requirements based on the need of individual tenants and potential future tenant. Moreover, utility lines are routinely replaced or upgraded without review as to potential environmental impact. We cannot see that a minor upgrade in electrical service through overhead power lines, if such an upgrade were required, could constitute a significant environmental impact.

**WILSON  
OKAMOTO**

**& ASSOCIATES, INC.**

April 21, 1995  
John Harrison, Ph.D.  
Page 2

Traffic Impacts

Based on the parking requirements specified in Table 3.1 (A) of the City and County of Honolulu Land Use Ordinance, 8,369 square feet of office and/or retail use would require a total of 21 stalls.

The trip generation methodology used in the assessment is based upon generally accepted techniques developed by the Institute of Transportation Engineers (ITE) and published in Trip Generation, 5th Edition, 1991. The ITE rates are developed empirically, by correlating the vehicle trip generation data with land use characteristics. In this scenario, trip generation is based on a general office land use type. Trips by employees, visitors, deliveries are accounted for in the trip generation estimate.

Intersection analysis is not considered in the assessment since the nearest major intersection is located more than one mile from the project site. The trips generated from the project site during the peak periods of traffic are relatively low and within the peak period daily fluctuation of intersection service volumes. Also, employee traffic generated by the proposed project is expected to occur in opposing directions of peak period commuter traffic flow. Visitor and delivery trips are expected to occur during business hours (off-peak periods) when intersection service volumes are significantly less.

Social Impacts

The proposal would not create new office and retail use at Paradise Park. Such uses are present in the existing facility. It would increase such use but concurrently decrease the amount of exhibit space available. Moreover, by establishing requirements for the selection of potential tenants, the tourism-oriented character of park usage will be changed. Such a change would address many of the concerns expressed by vocal opponents to the former operation.

We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Earl Matsukawa  
Project Manager

EM/ak

cc: Darryl Wong, Paradise Park, Inc.  
Kerry Komatsubara, Furutani, Sato and Komatsubara  
Cathy Tilton, Office of Conservation and Environmental Affairs

BENJAMIN J. CAYETANO  
Governor of Hawaii

REF: OCEA: CT



Chairperson  
MICHAEL D. WILSON  
Board of Land and Natural Resources

Deputy Director  
GILBERT COLOMA-AGARAN

Aquaculture Development  
Aquatic Resources  
Boating and Ocean Recreation  
Bureau of Conveyances  
Conservation and Environmental Affairs  
Conservation and Resources Enforcement  
Forestry and Wildlife  
Historic Preservation  
Land Management  
State Parks  
Water and Land Development

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APR 18 1995

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

P. O. Box 621  
Honolulu, Hawaii 96809

FILE: OA-30A

WILSON OKAMOTO & ASSOC., INC.

Mr. Earl K. Matsukawa  
Wilson Okamoto and Associates, Inc.  
1907 South Beretania Street, Suite 400  
Honolulu, Hawaii 96826

APR 17 1995

Dear Mr. Matsukawa:

SUBJECT: Revised Draft Environmental Assessment for Amendment to Conservation District Use Permit OA-30 by Converting the Use of Buildings to General Office and Retail Space at Paradise Park, Manoa, Honolulu, Oahu

The revised Environmental Assessment (EA) for the subject Conservation District Use Application (CDUA) was published in the OEQC Bulletin on March 8, 1995, as a Draft EA. The revised Draft EA underwent a formal 30-day review period which ended April 7, 1995. Pursuant to the Office of Environmental Quality Control's (OEQC) rules, the applicant is responsible for responding to all comments postmarked within the 30-day review period.

Comments received within the 30-day time frame include the following: the University of Hawaii Environmental Center, Department of Land and Natural Resources Division of Forestry and Wildlife, City and County of Honolulu Planning Department, the Manoa Neighborhood Board, Donald G. Aten, and Robert E. Thomas (see attached).

Additionally, we have the following comments on the Draft EA:

1. What are the existing and proposed hours and days of operation for existing and proposed uses? (For proposed uses, we suggest that you contact those entities listed on page 5 and inquire as to their hours and days of operation and the amount of traffic currently generated to and from their existing business.)
2. Alternatives to reduce vehicular traffic and noise: If the applicant limits the number of tenants who would occupy the buildings to one, would potential traffic and noise levels be reduced? What are the differences (if any) in traffic, noise, and hours and days of operation between retail and office space uses?

What is the possibility of restricting the hours of operation (for proposed and existing uses) to nine to five? Limiting the days of operation (for proposed and existing uses) to Monday through Friday and closed on weekends and holidays?

According to your information, page 11 shows the number of trips generated for "office space." What about the number of trips generated for retail space. Also, does this number include delivery, service vehicles, and other vehicle trips?

Page 12 identifies allowable noise levels for Preservation (P-1) districts. We have included a copy of a fax from the State of Hawaii Department of Health Noise and Radiation Branch that shows the types of activities associated with various decibel levels. Please include this fax in the Final EA as a means of disclosing the types of activities that are associated with 55 dBA and 45 dBA levels.

2. Since office and retail uses are more commonly associated with the State Land Use Urban District, what is the possibility of removing the subject lands from the Conservation District and placing it in the Urban District?
4. Has the applicant considered other land use types besides retail and office space for Paradise Park? (See attached City Council Resolution No. 94-152 "to amend the Primary Urban Center Development Plan Public Facilities Map by independent consideration to add a new park symbol for a publicly funded park, site determined, within six years, for the Paradise Park site in Manoa, Oahu, Hawaii.")
5. The maximum conversion area on pages 5 and 11 differ by 45 square feet. Please clarify. Also, Figure 2 "Site Map" shows a total of five buildings to be used by CVI. It is our understanding after talking with your staff, that only the Main Building and Discovery Center are proposed to be used for office and retail use. Please confirm.

According to OEQC, following the end of this 30-day review period, any comments received along with their responses must be incorporated into the Final EA. If appropriate, the text, figures, tables, maps, and other ancillary parts of the EA should be revised.

Mr. E. Matsukawa

-3-

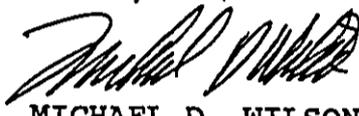
FILE: OA-30A

We have tentatively scheduled your application for the May 12, 1995 Board meeting on Oahu. In order to meet OEQC's and the Department's processing deadlines, we suggest that your immediate attention be given to finalizing the subject EA and submitting six copies to the Department by April 21, 1995.

Please be advised that non-compliance with Chapter 343, Hawaii Revised Statutes, will result in negative action on your application.

Thank you for your cooperation in this matter. Please call Cathy Tilton of our Office of Conservation and Environmental Affairs at 587-0377, should you have any questions.

Aloha,



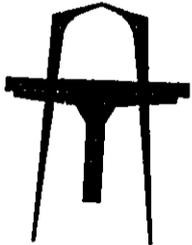
MICHAEL D. WILSON

Attachments

xc: Mr. James Wong, Paradise Park, Inc.

3332-01  
April 21, 1995

**WILSON  
OKAMOTO**  
& ASSOCIATES, INC.



ENGINEERS  
ARCHITECTS  
PLANNERS

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Honolulu, Hawaii 96811

Mr. Michael D. Wilson, Chairperson  
Department of Land and Natural Resources  
P.O. Box 621  
Honolulu, Hawaii 96809  
ATTN: Cathy Tilton

Dear Mr. Wilson:

Subject: Revised Draft Environmental Assessment (EA)  
for Amendment to Conservation District Use Permit OA-30  
Paradise Park, Manoa, Oahu

Thank you for your letter of April 17, 1995, (REF:OCEA:CT) regarding the subject Revised Draft EA. We offer the following responses to your numbered comments:

1. Under the current CDUA Permit, the hours of operation are from 7:00 am to 10:00 pm daily. Under the proposed changes, we anticipate the closure time of operations to remain the same.

Activities related to office and retail uses are anticipated to occur primarily during normal working hours. However, office hours would typically begin earlier, depending on any "flex-time" commuter arrangements that a tenant may promote to reduce commuter traffic. Furthermore, to the extent that these uses may be operated by non-profit organizations and/or volunteers, such activity may occur after normal working hours and/or on weekends. While weekend use of the office space is not expected to be significant, any restriction on use would impose an unnecessary hardship on potential tenants. In this regard, we consider 10:00 pm to be a reasonable time to close these activities.

The calculations used to estimate vehicular traffic are based on the Institute of Transportation Engineer's Trip Generation Handbook. The estimate of traffic generated is derived from the additional floor area assumed to be devoted to office use. Since the retail operations are ancillary to the operation of the botanical and zoological gardens (gift shops) or the tenants (office-related sundries), they are not expected to generate shopping trips. Thus, the estimate is regarded as conservative (more than what is likely to occur).

As discussed in the preceding paragraph, vehicular traffic is conservatively projected based on floor area devoted to office use. Retail operations are not anticipated to generate shopping trips. Thus, there is no comparison between noise generated by traffic for office and that for retail use.

**WILSON**  
**OKAMOTO**  
**& ASSOCIATES, INC.**

April 21, 1995  
Mr. Michael D. Wilson  
Page 2

As discussed earlier, the traffic projection was based on office use only. Deliveries and employee commute trips for retail use would be well within the estimate for office use.

As requested, the noise chart you provided to us will be included in the Final EA.

2. While general office and retail use are more commonly associated with the State Land Use Urban District, our proposed restrictions on tenant selection ties such use to the botanical and zoological gardens, which is allowed under the current CDUP. Based on the City and County of Honolulu Development Plan, it is unlikely that general office and retail use would be allowed even if the property were to be included within the State Urban District through a boundary amendment.
4. Alternative land uses for Paradise Park have been considered. Due to budget constraints on both the City and State level, such a plan for a publicly funded park is not feasible at this time.
5. Paradise Park, Inc. proposes to convert a total of 8,369 square feet (6,742 square feet of space located in the Main Building and 1,627 square feet of located in the Discovery center) of exhibit space to general office/retail use. The traffic assessment incorrectly used the slightly smaller figure and will be revised in the Final EA. We also confirm that only space within the Main Building and Discovery Center are proposed for conversion to office or retail use.

We will be responding to all comments received on the Revised Draft EA and revising the Final EA, as required. Six copies of the Final EA to your office on April 21, 1995 in order to meet your processing deadlines.

Should you have any further questions, please feel free to contact me at 946-2277.

Sincerely,



Earl Matsukawa  
Project Manager

EM/ak

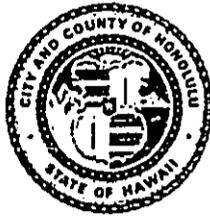
cc: Darryl Wong, Paradise Park, Inc.  
Kerry Komatsubara, Furutani, Sato and Komatsubara  
Cathy Tilton, Office of Conservation and Environmental Affairs

1-287A

114

PLANNING DEPARTMENT  
**CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET  
HONOLULU, HAWAII 96813



JEREMY HARRIS  
MAYOR

CHERYL D. SOON  
CHIEF PLANNING OFFICER  
CAROLL TAKAHASHI  
DEPUTY CHIEF PLANNING OFFICER

RECEIVED  
'95 MAR 22 PM 1:54  
DLNR  
OCEA

TH 3/95-0412

March 20, 1995

CT

Honorable Michael D. Wilson, Chairperson  
Board of Land and Natural Resources  
Department of Land and Natural Resources  
State of Hawaii  
P.O. Box 621  
Honolulu, Hawaii 96809

Dear Mr. Wilson:

Revised Draft Environmental Assessment (DEA)  
for Paradise Park, Manoa, Tax Map Keys 2-9-54: 7 and

DEPT. OF LAND  
& NATURAL RESOURCES  
STATE OF HAWAII

95 MAR 21 P 3: 34

RECEIVED

In response to your letter of March 6, 1995, we have reviewed the Revised DEA and have no comments in addition to those submitted in our letter of January 13, 1995.

Should you have any questions, please contact Tim Hata of our staff at 527-6070.

Sincerely,

*Caroll Takahashi for CDS*

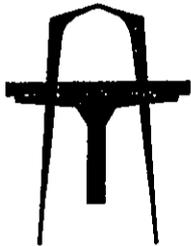
CHERYL D. SOON  
Chief Planning Officer

CDS:ft

add

3332-01  
April 21, 1995

**WILSON  
OKAMOTO**  
& ASSOCIATES, INC.



ENGINEERS  
ARCHITECTS  
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Mailing address:  
P. O. Box 3530  
Honolulu, Hawaii 96811

Ms. Cheryl D. Soon, Chief Planning Officer  
Planning Department  
650 South King Street  
Honolulu, Hawaii 96813

Dear Ms. Soon:

Subject: Paradise Park Request to Amend Existing  
Conservation District Use  
Manoa, Oahu

Thank you for your letter of March 20, 1995 indicating that you have no further comments other than those submitted in your January 13, 1995 letter. We have transmitted a response to your earlier letter which you have already received our responses to. We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,

Earl Matsukawa  
Project Manager

EM/ak

cc: Darryl Wong, Paradise Park, Inc.  
Kerry Komatsubara, Furutani, Sato and Komatsubara  
Cathy Tilton, Office of Conservation and Environmental Affairs

**RECEIVED**  
MAR 22 1995

3281 Manoa Road  
Honolulu, Hawaii 96822

WILSON OKAMOTO & ASSOCIATES, INC.

March 20, 1995

Department of Land and Natural Resources  
Office of Conservation and Environmental Affairs  
1151 Punchbowl Street  
Honolulu, Hawaii 96813

Attention: Cathy Tilton

Gentlemen:

Reference your letter of March 6, 1995, Subject: Revised Draft Environmental Assessment for Paradise Park, Manoa, Honolulu, Oahu.

The following comments are keyed to quotations from the Revised Draft Environmental Assessment :

Page ii, Proposed Action. "The Owner proposes to convert up to 6,742 square feet of existing exhibit space in the Main Building and 1,627 square feet of existing exhibit space in the Discovery Center to general office and retail use. The Owner also proposes to sublease all or portions of existing buildings, including any converted spaces, to one or more tenants."

Comments:

The Main Building has 28,911 square feet of floor area (page 1, paragraph I.B.). Therefore, in addition to the 6,742 square feet of converted space, there is another 22,169 square feet of unconverted space for general office and retail use.

Does the Discovery Center also have unconverted space for general office and retail use? If so, how many square feet?

Do other buildings have unconverted space for general office and retail use? If so, which buildings and how many square feet?

Page 5, paragraph I.C. "The owner proposes to continue Paradise Park's botanical and zoological gardens - -".

Comments:

In 1966, DLNR approved Paradise Park's request to establish zoological and botanical gardens for "recreational purposes."

Through the years, the zoological and botanical gardens have dwindled to an extent that their use for "recreational purposes" is more apparent than real.

Page 13, paragraph IV.A. If the proposal is not approved "- - the interpretative and educational value of the botanical park to the public will be lost."

Comment: The interpretative and educational value was lost in 1993 when Paradise Park and the botanical and zoological gardens were closed to the public.

Page 6, paragraph I.C. "The owner will continue its bird activities and operations - - and intends to - - continue its plant and bird sales operations - -".

Comment: Since the botanical and zoological gardens are closed to the public, are the gardens used for purposes other than the propagation and sale of plants and birds? If so, for what purposes?

Page 12, paragraph III.B.5. "In the long run, by maintaining the existing zoological and botanical gardens, the sublessee(s) activities will enhance protection and propagation of rare plant species in Hawaii."

Comments:

Will the sublessee(s) activities also enhance the protection and propagation of rare bird species? If so, are the species unique to Paradise Park or are they also propagated and sold by commercial bird aviaries?

Are the rare plant species unique to Paradise Park or are they also propagated and sold by commercial plant nurseries?

Page 5, paragraph I.C. "As of this date, the Owner has received interest to utilize Paradise Park - -" from the various government agencies and non-profit organizations listed in categories (i), (ii), (iii) and (iv) in paragraph I.C.

Comments:

Other than the non-profit organizations listed in categories (i), (ii), (iii) and (iv), would other kinds of non-profit organizations be permitted to sublease space? If so, what kinds of organizations?

If enough government agencies and non-profit organizations could not be found to sublease the space, would "for-profit" organizations and businesses be permitted to sublease space? If so --

What kinds of organizations and businesses?

When would they be open (hours and days) for business?

Page 5, paragraph I.C. " - - the Owner proposes to use the existing buildings to house - - (v) other organizations and businesses ancillary to Paradise Park's botanical and zoological garden and its tenants."

Comments:

Since the garden is closed to the public, what kinds of other organizations and businesses would be permitted as "ancillary" (subordinate) to the garden?

What kinds of other organizations and businesses would be permitted as "ancillary" (subordinate) to its tenants?

If enough "ancillary" organizations and businesses could not be found to sublease the space, would "non-ancillary" organizations and businesses be permitted to sublease space? If so --

What kinds of organizations and businesses?

When would they be open (hours and days) for business?

Page 11, paragraph III.B.1. "The conversion of a maximum of 8,414 square feet of exhibit space to general office use with ancillary retail use, could generate - - up to 55 trips during the morning peak hours and 57 trips during afternoon peak traffic periods - - by - - employees - - heading into Manoa and vice-versa for the afternoon peak."

Comments:

How much additional "employee" traffic would be generated by using the "unconverted" space for general office and retail use (page ii, Proposed Action)?

How much traffic (delivery trucks, service vehicles and buses carrying supplies, merchandise and customers to the offices and stores) would be generated by using the "unconverted" space as well as the "converted" space for general office and retail use?

Page 6, paragraph I.D. "Since the closure of Paradise Park as a visitor attraction, its owners have been seeking an appropriate replacement for economic reasons."

Comments:

The owners entered into the Paradise Park venture on their own initiative and at their own risk.

The proper use of conservation-district land and tranquility of the residential neighborhood should be the determining factors in the permit process.

The Owner's proposal (page ii, Proposed Action) to use the Paradise Park buildings for general office and store space should be considered as a request to change the basic nature of Paradise Park -- from a "recreational park" to a "commercial office space and retail sales complex."

Per paragraph C(1) of Section 2, DLNR Regulation Number 4 -- "Any and all uses permitted within the "GU" Conservation Subzone shall, without exception, be subject to the following conditions:

"(1) The use shall be compatible with the locality and surrounding areas and appropriate to the physical conditions and capabilities of the specific parcel and/or parcels of land."

The quoted DLNR regulation should be enforced because a commercial office space and retail sales complex is not compatible with the residential neighborhood in upper Manoa Valley.

If the proposal is approved --

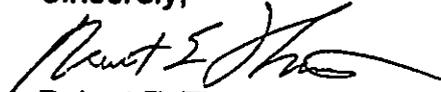
It will, in effect, change the land use designation from "conservation district" to "business district."

Paradise Park will be unique in that it will be the only commercial office space and retail sales complex permitted to operate within a tropical rain forest.

Paradise Park will become just a place for commercial offices and for stores and enterprises that cater to the public.

The tranquility of the residential neighborhood will again be compromised.

Sincerely,



Robert E. Thomas

Copy to:

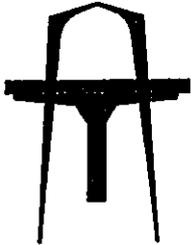
Office of Environmental Quality Control  
220 South King Street, Suite 400  
Honolulu, Hawaii 96813

Paradise Park, Inc.  
1035 University Avenue, Suite 201  
Honolulu, Hawaii 96826  
Attention: James Wong

✓ Wilson Okamoto and Associates, Inc.  
1907 South Beretania Street, Suite 400  
Honolulu, Hawaii 96826  
Attention: Earl Matsukawa

3332-01  
April 21, 1995

**WILSON**  
**OKAMOTO**  
& ASSOCIATES, INC.



ENGINEERS  
ARCHITECTS  
PLANNERS

1907 S. BERETANIA STREET  
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PH: (808) 946-2277  
FAX: (808) 946-2253

Mailing address:  
P. O. Box 3530  
Honolulu, Hawaii 96811

Mr. Robert E. Thomas  
3281 Manoa Road  
Honolulu, Hawaii 96822

Dear Mr. Thomas:

Subject: Paradise Park Use Change  
Revised Draft Environmental Assessment (EA)  
Manoa, Oahu

Thank you for your letter of March 20, 1995 commenting on the Revised Draft EA for the Paradise Park Use Change. The following responses are made in the respective order of your comments.

Page ii, Proposed Action

Paradise Park proposes to convert 6,742 square feet of the Main Building to general office/retail use, leaving a remainder of 22,169 square feet of converted office/retail space. Approximately 11,019 square feet of this space is used by the Treetops Restaurant, while the balance was used for the Paradise Park gift shop and offices.

The proposed change would convert the entire floor area, approximately 1,627 square feet, of the Discovery Center to general office/retail use.

Currently, there is also 400 square feet of space in the amphitheater that was used as a snack shop. Retail use of this space would be allowed to continue.

Page 5, paragraph I.C.

The 1966 CDUA allows Paradise Park to operate its botanical and zoological gardens, as approved, regardless of its current condition.

Page 13, paragraph IV.A.

The interpretive and educational value of the park will be lost as long as Paradise Park remains closed. For the foreseeable future, it is not economically feasible to reopen the park. If the proposed use change is denied, however, the owner may be forced to consider at least a partial reopening of the park.

April 21, 1995  
Mr. Robert E. Thomas  
Page 2

Page 6, paragraph 1.C.

Currently, the botanical and zoological gardens are closed. The only activity at the park is minimum maintenance work, the bird propagation and nursery operations, and associated plant and bird sales.

Page 12, paragraph III.B.5

Currently, Paradise Park is seeking sublessees who will continue to maintain the botanical and zoological gardens. Paradise Park Inc. will continue its propagation of rare bird and plant species. It is uncertain if other commercial plant nurseries are propagating and selling all of the species currently being propagated at Paradise Park. Some of the bird species at Paradise Park are not found elsewhere in the Hawaii. It is unclear how your comments relates to the environmental impact of the proposed conversion of use.

Page 5, paragraph I.C.

Tenants to be considered must fit within one or more of the five categories described in the EA, whether they are non-profit organizations or private businesses. For example, one business that had expressed interest in office space develops educational CD-ROM computer programs which are manufactured at a different location. This business is educational in nature and would have been ancillary to the botanical and zoological gardens because it used the gardens as a component of its educational computer programs and as a setting for its video imaging. Other businesses that may be ancillary to the gardens include environmental or nature theme gift shops as well as snack shop(s). A sundry shop catering to office tenants would be ancillary to tenant use.

The core hours of operation for office tenants is anticipated to be within typical office hours, Monday through Saturday, although access by workers who may be periodically be putting in extra hours would not be restricted during other times. A sundry shop would likely be open only during the core office hours.

Public use of the zoological and botanical gardens is anticipated to be within the hours of 8:00 am and 6:00 pm daily, including weekends and some holidays. Maintenance activities would probably extend beyond these hours but any noisy operations such as tree trimming would be limited on weekdays. Gift shops would be open while the gardens are open to the public, although they would not be necessarily be required to stay open during the entire time. The Treetops Restaurant could be anticipated to stay open as late as 10:00 pm if demand were sufficient.

April 21, 1995  
Mr. Robert E. Thomas  
Page 3

Page 11, paragraph III.B.1

No additional traffic would be generated by the unconverted space since the associated traffic is accounted for in the baseline condition.

The volume of traffic associated with the park in general is anticipated to decline in comparison to its prior use as a visitor attraction.

Page 6, paragraph I.D.

It is acknowledged that the Paradise Park venture was the owner's initiative and risk.

The proposed criteria in selecting tenants and the limited amount of space available hardly warrants a characterization of "commercial office space and retail sales complex." The recreational use of the botanical and zoological gardens remains the primary use.

The remainder of your comments are opinions that will be considered in the CDUA deliberations

We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Earl Matsukawa  
Project Manager

EM/ak

cc: Darryl Wong, Paradise Park, Inc.  
Kerry Komatsubara, Furutani, Sato and Komatsubara  
Cathy Tilton, Office of Conservation and Environmental Affairs

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'95 MAR 23 AM 11:41

3277 Manoa Road  
Honolulu HI 96822  
22 March 1995

Department of Land and Natural Resources  
Office of Conservation and Environmental Affairs  
1151 Punchbowl Street  
Honolulu HI 96813

DLNR  
OCEA

Dear Sirs:

I have just learned, quite accidentally I might add, that Paradise Park is seeking to engage in yet another venture on conservation land deep in Manoa valley. It is fortunate for the management of Paradise Park that this effort has received virtually no public notice because, if the residents of Manoa valley were aware of the proposal, there would be an uproar of protest.

In my view, the revised environmental assessment is but a litany of vague platitudes and promises. As in the past, the verbiage is crafted to convey the magnanimity of the enterprise in order to cloak other motives. The residents of Manoa have heard warm fuzzy phrases like "protection . . . of the environment," "research and development in the zoological and botanical sciences," "educational entities," and "community non-profit organizations" before!

It is my view that the Department of Land and Natural Resources, of all public agencies, should be the most sensitive to the importance of protecting conservation land against inappropriate use, whether "legal" or not, and should lead the effort to deny the use of conservation land for any purpose other than conservation however lofty the professed intent of the petitioner.

It is my view, too, that it is wrong to believe that Manoaans, and other people who rail against the exploitation of conservation land, are somehow against "research" and "education" and "non-profit" ventures. As noble as these enterprises may be, the fact remains that locating such activities under the shroud of a commercial umbrella on conservation land deep in the heart of a residential area simply does not make sense.

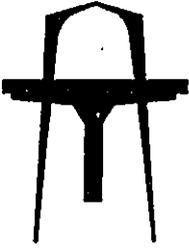
If you are indeed going to seriously consider the petition from Paradise Park, I would urge that you do two things. The first is that you provide the residents of Manoa valley with a real opportunity for input. The second is that you very carefully review the long history of Paradise Park in Manoa, focusing on the relationship between the words and the deeds.

Sincerely,

Donald G. Aten

3332-01  
April 21, 1995

**WILSON**  
**OKAMOTO**  
**& ASSOCIATES, INC.**



**ENGINEERS**  
**ARCHITECTS**  
**PLANNERS**

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FAX: (808) 946-2253

Mailing address:  
P. O. Box 3530  
Honolulu, Hawaii 96811

Mr. Donald G. Aten  
3277 Manoa Road  
Honolulu, Hawaii 96822

Dear Mr. Aten:

Subject: Paradise Park Use Change  
Revised Draft Environmental Assessment (EA)  
Manoa, Oahu

We have received your letter of March 22, 1995 commenting on the Revised Draft EA for the Paradise Park Use Change. We acknowledge your views but your comments do not specifically address the subject EA.

As a part of the Conservation District Use Application process, there will be a public hearing on Thursday, April 27, 1995 at 6:00 PM at the Manoa School Cafetorium. At this time, public testimony will be received.

Sincerely,

Earl Matsukawa  
Project Manager

EM/ak

cc: Darryl Wong, Paradise Park, Inc.  
Kerry Komatsubara, Furutani, Sato and Komatsubara  
Cathy Tilton, Office of Conservation and Environmental Affairs

EM ✓  
ACK

April 7, 1995

Department of Land and Natural Resources  
Office of Conservation and Environmental Affairs  
State of Hawaii  
1151 Punchbowl Street  
Honolulu, Hawaii 96813

RECEIVED  
APR 10 1995

WILSON OKAMOTO & ASSOC., INC.

Attention: Cathy Tilton 587-0377

Re: Paradise Park Use Change District: Honolulu  
Tax Map Key: 2-9-54: 7 & 18  
Comments on the Revised Draft Environmental  
Assessment Dated February 1995

Dear Ms. Tilton:

This letter is to respond to the Revised Draft Environmental Assessment (RDEA) for Paradise Park, Inc. prepared by Wilson Okamoto & Associates, Inc. dated February 1995, which supersedes the December 1994 Draft Environmental Assessment (DEA) that was withdrawn by the applicant.

I hereby incorporate by reference the comments submitted on the original DEA by the Manoa Neighborhood Board No. 7 in the four-page letter dated February 6, 1995 and signed by myself as Chair and by the Board's Planning & Transportation Committee Co-Chairs Karl Kim and John McLaren. (Copy attached).

I also acknowledge receipt of a two-page letter from Earl Matsukawa, Project Manager, of Wilson Okamoto & Associates, Inc. as his response to the Manoa Neighborhood Board's February 6, 1995 letter. (Copy attached.)

The limited amendments to the RDEA do not appear to substantively address the concerns raised in the Manoa Neighborhood Board's letter of February 6, 1995.

The Planning & Transportation Committee met on March 22, 1995 and discussed the Paradise Park use change matter at length. Present for the applicant were Darryl Wong, General Manager of Paradise Park, Inc.; Kerry Komatsubara, attorney at law for the applicant; and Earl Matsukawa and Allen Kam of Wilson Okamoto & Associates, Inc. Unfortunately subsequent time and logistical constraints prevented the full Board's consideration of any full written draft for possible adoption as an official action.

The comments contained herein are made in my individual capacity and are my responsibility. These comments shall not be attributed to the Manoa Neighborhood Board.

Paradise Park Use Change  
Revised Draft Environmental Assessment Comments  
Tom Heinrich  
April 7, 1995

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Given the long-standing concerns of the Manoa community with respect to Paradise Park, the significance of the proposed changes for both the use of Paradise Park itself and especially **the possible impacts on the broader policies concerning commercial uses of conservation district lands and resources**, I remain disappointed by the continued inadequacy of the RDEA.

**Misrepresentation of "Interested Parties."**

I call the attention of the Board of Land and Natural Resources to the list of organizations included at page 5 of the RDEA. Upon questioning of the applicant at the March 22, 1995 meeting, it was acknowledged that "the Owner" had in fact **NOT** "received interest to utilize Paradise Park" from the named organizations!

The identification of the organizations was apparently intended to be illustrative of the desirable groups or activities hoped to be attracted to Paradise Park if it is allowed to sublease areas as commercial office space. None of the organizations named had been asked for permission to be so identified nor otherwise granted any authority to be so identified in the RDEA.

Further discussion on March 22 focused on the **inadequacies of the RDEA to address or acknowledge the substantial legal issues and scope of impacts on the conservation district issues** which confront this application.

While the EA process may not ordinarily address such concerns, if the applicant wishes to avoid a full environmental impact statement by qualifying for a negative declaration, then the RDEA should certainly be a more complete and persuasive document than at present.

By the issues presented by this proposed more expansive change to the existing Conservation District Use Permit (CDUP) and the precedent which would be set affecting all conservation district areas statewide, the applicant would be well advised to take advantage of every opportunity to be a persuasive advocate for the proposed change. As stated in the February 6, 1995 letter and renewed here, **I believe the RDEA fails to prove that a negative declaration should be the appropriate determination.**

Paradise Park Use Change  
Revised Draft Environmental Assessment Comments  
Tom Heinrich  
April 7, 1995

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There are two distinct challenges in the process at this time:

- (1) Relating to the adequacy of the environmental assessment:  
Does the applicant qualify for a negative declaration determination based on the RDEA as submitted?; and
- (2) Relating to the application itself:  
Should the application to amend Paradise Park, Inc.'s existing CDUP to allow the sublease of portions of its facilities to tenants for use as commercial office space be approved by the Board of Land and Natural Resources?

The policy and legal criteria to be met to answer the second question is paramount to the first issue.

The statement at page ii of the RDEA that "no significant impacts are anticipated" is unsupported and wholly inadequate due to the lack of information and discussion in the document as a whole. I believe that a negative declaration determination should not be issued based on the RDEA as submitted to the Department of Land and Natural Resources.

#### Public Hearing.

I earlier informed you that at such time that a public hearing is held on the applicant's CDUP amendment application, it is the unanimous position of the Manoa Neighborhood Board that the hearing be scheduled at a time and place within Manoa Valley convenient to the public as was done for the October 1991 DLNR public hearing on Paradise Park's plan to install dinosaur exhibits and mazes.

You have recently notified me that the public hearing has been set for Thursday April 27, 1995 at 6:00 PM at the Manoa School cafeteria.

On behalf of the Manoa Neighborhood Board and myself, I wish to express my appreciation to the members of the Board of Land and Natural Resources for their courtesy extended to the Manoa community by their holding this public hearing at Manoa School.

Paradise Park Use Change  
Revised Draft Environmental Assessment Comments  
Tom Heinrich  
April 7, 1995

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Thank you for this opportunity to comment on the Revised Draft Environmental Assessment, and for your thorough consideration of the legal, environmental, and land use issues raised by the applicant's proposal.

Sincerely,

*Tom Heinrich*

Tom Heinrich  
3159 Oahu Avenue  
Honolulu, Hawaii 96822-1247

cc:

Paradise Park, Inc.  
1035 University Avenue, Suite 201  
Honolulu, Hawaii 96826

Attention: James Wong, President

Wilson Okamoto & Associates, Inc.  
1907 South Beretania Street, Suite 400  
Honolulu, Hawaii 96826

Attention: Earl Matsukawa, Project Manager

Mr. Gary Gill, Director  
Office of Environmental Quality Control  
220 South King Street, 4th Floor  
Honolulu, Hawaii 96813

Senator Brian Taniguchi  
State Office Tower, Room 510  
235 South Beretania Street  
Honolulu, Hawaii 96813

Representative Ed Case  
State Office Tower, Room 1210  
235 South Beretania Street  
Honolulu, Hawaii 96813

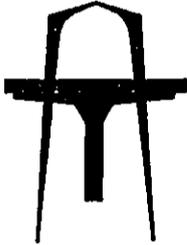
Councilmember Andy Mirikitani  
City & County of Honolulu  
530 South King Street  
Honolulu, Hawaii 96813

Ms. Ann Kobayashi  
Special Assistant to the Mayor  
City & County of Honolulu  
530 South King Street  
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President Mary Cooke  
Malama o Manoa  
P. O. Box 61961  
Honolulu, Hawaii 96839

3332-01  
April 21, 1995

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Mailing address:  
P. O. Box 3530  
Honolulu, Hawaii 96811

Mr. Tom Heinrich  
3159 Oahu Avenue  
Honolulu, Hawaii 96822-1247

Dear Mr. Heinrich:

Subject: Paradise Park Use Change  
Revised Draft Environmental Assessment (EA)  
Manoa, Oahu

Thank you for your letter of February 6, 1995 commenting on the Revised Draft EA for Paradise Park Use Change. We offer the following responses to comments which pertain to the material contained in the revised EA.

Misrepresentation of Interested Parties

As we explained in our discussions with you, the Owner had contact with persons associated in some capacity with the organizations listed. We did not infer that the contacts were made with official representatives or that interest extended beyond discussions of possible usage of the facilities. The list was meant to be illustrative and implies no endorsement of the project, in any way, by the organizations listed.

Conservation District Issues

The EA is not intended to be a persuasive document; it is intended to discuss potential environmental and social impacts of the project. The CDUA process is intended to address the issue of the appropriateness of proposed use in the Conservation District. A negative determination is based on the significance of a project's environmental and social impact, as opposed to its consistency with the intent of the Conservation District. You offer no specifics regarding the significance of project impacts on which we can comment.

Your prior comments and our response will be included in the Final EA.

**WILSON**  
**OKAMOTO**  
**& ASSOCIATES, INC.**

April 21, 1995  
Mr. Tom Heinrich  
Page 2

We appreciate your interest and participation in the consultation phase of the environmental review process.

Sincerely,



Earl Matsukawa  
Project Manager

EM/ak

cc: Darryl Wong, Paradise Park, Inc.  
Kerry Komatsubara, Furutani, Sato and Komatsubara  
Cathy Tilton, Office of Conservation and Environmental Affairs