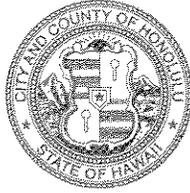


DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
TELEPHONE: (808) 523-4432 • FAX: (808) 527-6743
DEPT. INTERNET: www.honolulu.gov • INTERNET: www.honolulu.gov



MUFI HANNEMANN
MAYOR

HENRY ENG, FAICP
DIRECTOR

DAVID K. TANQUE
DEPUTY DIRECTOR

2004/ED-34 (TC)

June 8, 2005

RECEIVED
JUN 13 12:28
OFFICE OF ENVIRONMENTAL
QUALITY CONTROL

Ms. Genevieve Salmonson, Director
Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

Dear Ms. Salmonson:

Chapter 343, HRS
Environmental Assessment (EA)/Determination
Finding of No Significant Impact (FONSI)
Royal Kai Lani

Applicant	:	RKL Beachside, LLC
Landowner	:	RKL Beachside, LLC
Agent	:	AMEC Earth & Environment, Inc.
Location	:	2452 Kalakaua Avenue - Waikiki
Tax Map Key	:	2-6-023:004
Request	:	Special Management Area Permit (Major) Waikiki Special District Permit (Minor)
Proposal	:	Renovation and conversion of existing hotel to residential condominium
Determination	:	A Finding of No Significant Impact is Issued

Attached and incorporated by reference is the Final EA prepared by the applicant for the project. Based on the significance criteria outlined in Title 11, Chapter 200, Hawaii Administrative Rules, we have determined that preparation of an Environmental Impact Statement is not required.

We have enclosed a completed OEQC Bulletin Publication Form and four copies of the Final EA.

If you have any questions, please contact Anthony Ching of our Urban Design Branch at 527-5833.

Sincerely yours,

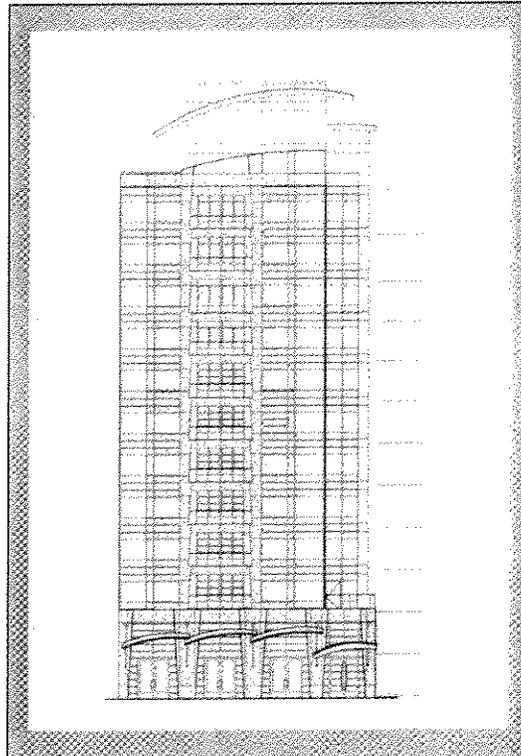
Barbara A. Moon
HENRY ENG, FAICP
for Director of Planning
and Permitting

HE:pl
Enclosures

cc: AMEC Earth & Environment, Inc.
doc374525rev1

Final Environmental Assessment

Royal Kai Lani



UFC OF ENVIRONMENTAL
QUALITY CONTROL

05 JUN 13 P 2:28

RECEIVED

2452 Kalakaua Avenue
Honolulu, Oahu, Hawaii

Prepared for:

City and County of Honolulu
Department of Planning and Permitting
and
RKL Beachside, LLC.

May 2005

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A	Comments from Consulted Agencies and Response to Comments

SUMMARY

Applicant: RKL Beachside LLC
2085 Ala Wai Boulevard, Suite 20-2
Honolulu, Hawaii 96815
Contact: Michael Richardson
Phone: (775) 691-7260

EA Preparer: AMEC Earth & Environmental, Inc.
3375 Koapaka Street, Suite F-251
Honolulu, Hawaii 96819
Contact: Russell Okoji, Ph.D.
Project Manager
Phone: (808) 545-2462 x110

Accepting Authority: City and County of Honolulu
Department of Planning and Permitting

Project Location: 2452 Kalakaua Avenue
Honolulu, Hawaii 96815

Tax Map Key: 2-6-023-004

Area: Approximately 0.115 acres (5,000 square feet)

Recorded Fee Owner: RKL Beachside LLC

Existing Land Use: Hotel

State Land Use: Urban

Classification:

LUO Zoning: Resort mixed use precinct

LUO Special District: Waikiki Special District

Flood Zone: Flood Insurance Rate Map Zone X

Parties To Be Consulted
During Draft EA:

State Agencies

Department of Business, Economic
Development and Tourism (DBEDT)

Department of Health, Office of Environmental
Quality Control

Department of Health

- Noise, Radiation & Indoor Air Quality
Branch
- Clean Air Branch

Department of Land and Natural Resources

Office of Hawaiian Affairs

University of Hawaii, Manoa, Environmental
Center

Senator Les Ihara

Representative Galen Fox

County Agencies

Board of Water Supply

Department of Design and Construction

Department of Environmental Services

Department of Planning and Permitting, Building
Division

- Zoning Plans Review Branch

Surrounding Landowners

SECTION 1 INTRODUCTION AND PROJECT DESCRIPTION

Pursuant to Hawaii's environmental impact statement law (HRS 343), the government is required to give systematic consideration to the environmental, social, and economic consequences of proposed development projects prior to allowing construction to begin. AMEC Earth and Environmental, Inc. (AMEC), was hired by RKL Beachside LLC to conduct an Environmental Assessment (EA) for the proposed Royal Kai Lani (hereafter, referred to as the Site). The purpose of this EA is to evaluate the possible direct, indirect and cumulative environmental effects of renovating the current structure into a luxury condominium. This EA is required as the Site sits within the Waikiki Special District.

1.1 INTRODUCTION

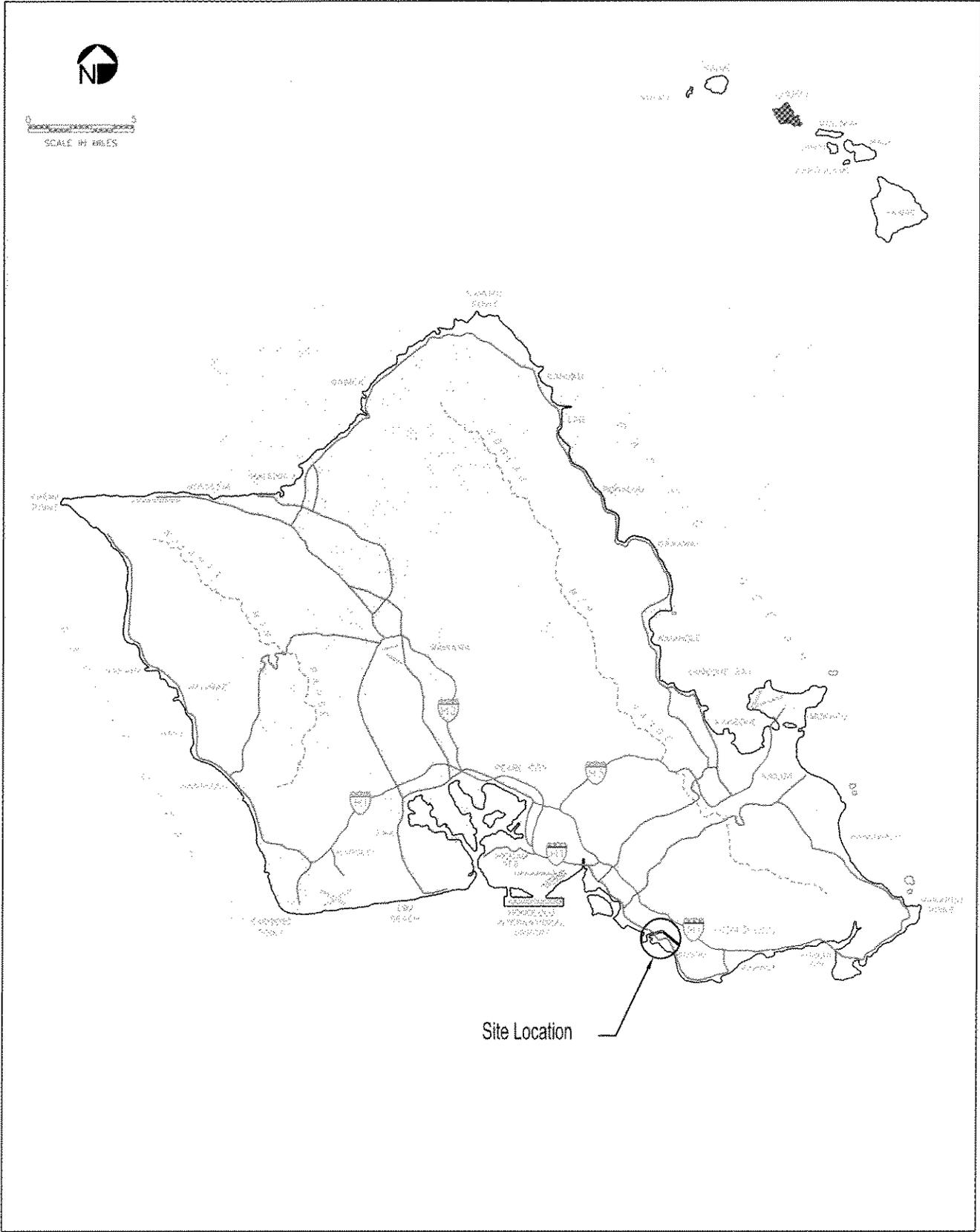
The Site consists of one structure, the Aston Waikiki Beach Hotel, which was built in 1966, and later renovated in 1990. The 12-story, 79-room hotel was purchased by RKL Beachside LLC in 2003. RKL Beachside LLC plans to renovate the Aston Waikiki Beachside Hotel into a 10-unit luxury condominium, the Royal Kai Lani.

1.2 PROJECT LOCATION

The Site is located at 2452 Kalakaua Avenue on the eastern end of Waikiki, across the street from Waikiki Beach (Figure 1). The existing building is 101 feet to the uppermost floor (12th floor) and 123 feet to the top of the existing elevator/stair tower. It is bordered to the south by Kalakaua Avenue, to the west by the Hyatt Regency Waikiki Resort and Spa (parking and convention center), and to the east by a retail store. The Site is designated by Tax Map Key 2-6-023-004 and encompasses approximately 5,000 square feet of resort mixed-use zoned land (Figure 2).

1.3 PROJECT PURPOSE AND NEED

The development of the Royal Kai Lani fulfills the Office of Waikiki Developments (OWD) and the Waikiki Special Districts (WSD) goal of increasing the competitive value of Waikiki as a unique visitor destination. The Royal Kai Lani is a reinvestment into Waikiki, bringing a new vision to the area that departs from the traditional view that



Site Location

FIGURE

1

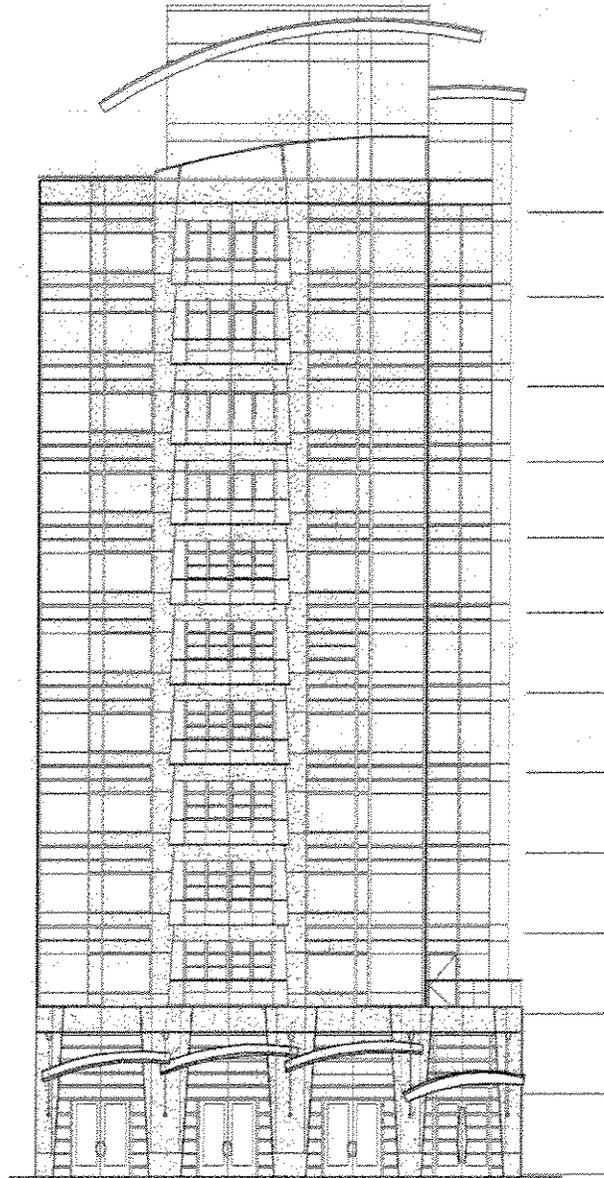
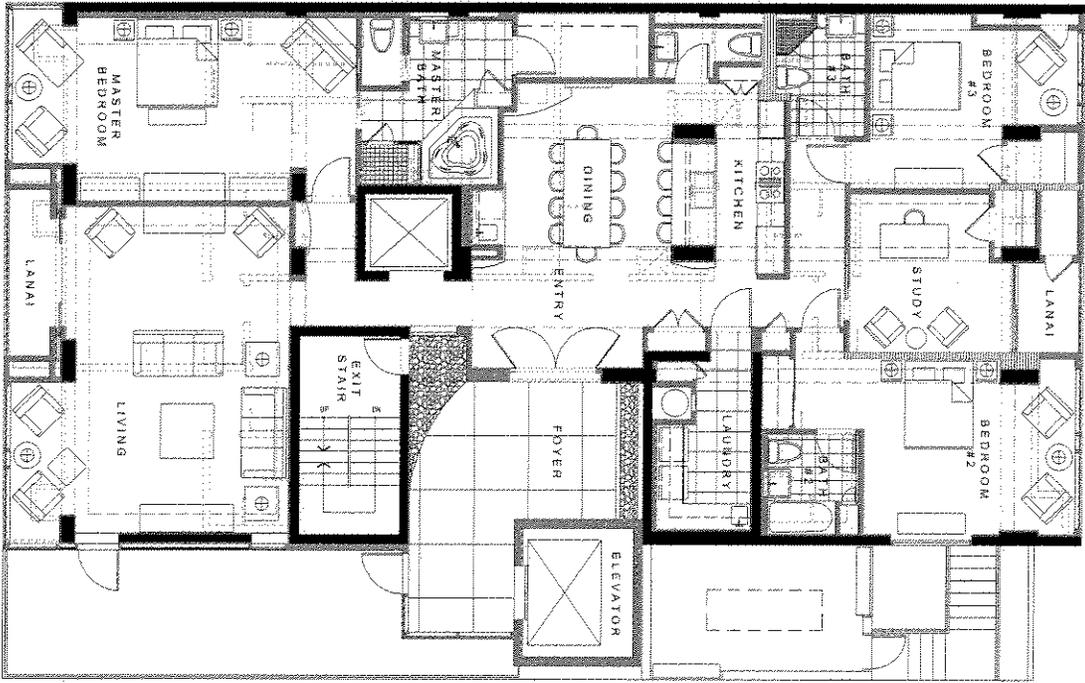
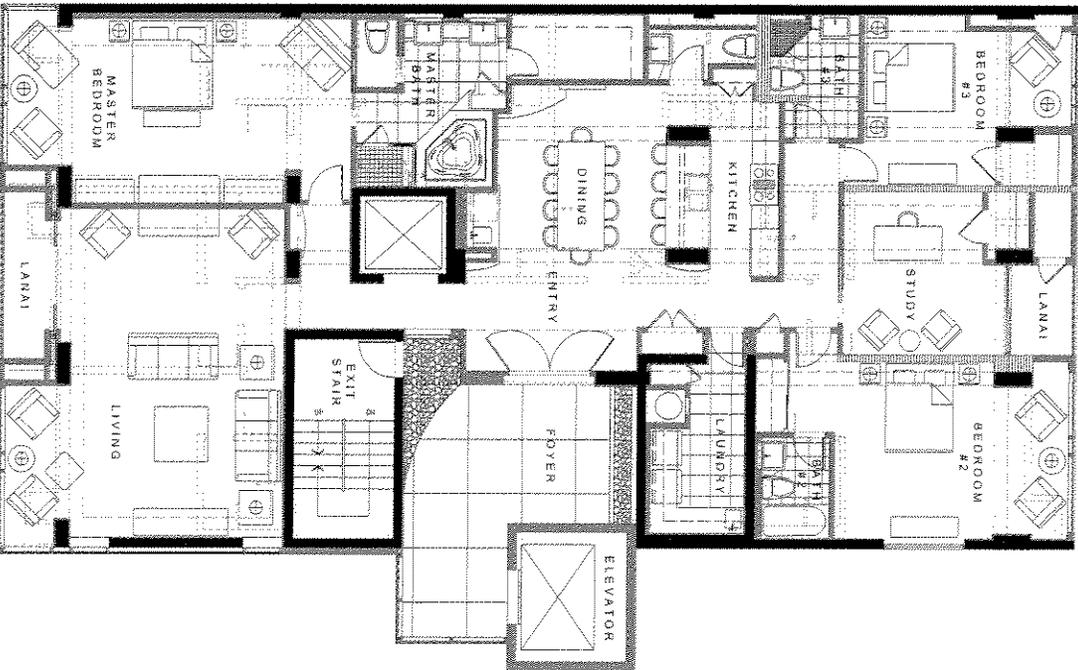


Figure 3
Exterior Elevation - Front



3RD FLOOR FHA PLAN

Figure 7: Proposed 3rd & 4th Floor Plan



4TH FLOOR TYPICAL PLAN (FLOORS 4TH - 12TH)

ROYAL KAI LANI

SCHEMATIC DESIGN

29 JULY 2004

DATE



Figure 9
Exterior View of Front Entrance



Figure 10
View of structures East of building
(retail shop, Waikiki Circle Hotel and Aston Beach Tower Hotel)

SECTION 2 DESCRIPTION OF THE EXISTING ENVIRONMENT, PROJECT IMPACTS AND MITIGATION MEASURES

This section of the EA will discuss existing conditions at the Site and possible direct, indirect and cumulative environmental effects of the proposed renovation. In instances where the proposed project impacts the environment, mitigation alternatives will also be discussed.

2.1 CLIMATE

The climate found in Honolulu is characterized by mild and constant temperatures, moderate humidity, and the persistence of the northeasterly trade winds. Daily maximum temperatures range from low to high 80s. Daily minimum temperatures range from mid-60s to low 70s. The average annual rainfall is approximately 20 to 25 inches per year. The majority of the total annual rainfall occurs between October and March, with the wettest months occurring in November through January.

2.2 SOILS

The US Department of Agriculture (USDA) soil survey of *Islands of Kauai, Oahu, Maui, Molokai, and Lanai, State of Hawaii* classified the soil of the Site as part of the Lualualei-Fill land-Ewa association (USDA 1972). This association is made up of well-drained, fine textured and moderately fine textured soils. The land at the Site is part of the Jaucas Series of soils, and is classified as Jaucas sand (JaC). The Jaucas Series consists of excessively drained, calcareous soils that occur on the coastal plains adjacent to the ocean. Jaucas sand is single grain, pale brown to very pale brown, sandy, and more than 60 inches deep. The surface layer at many locations is typically dark brown, due to the accumulation of organic matter and alluvium. Permeability of the Jaucas sand is rapid, and runoff is slow to very slow. There is a slight hazard of erosion due to water. Erosion from wind poses a severe hazard where vegetation has been removed.

Impacts and Mitigation Measures

No significant impact to soils at the Site is anticipated as a result of renovation activities. Substances that could adversely affect soils in the vicinity of the Site

Impacts and Mitigation Measures

No significant impact to ground water at or near the Site is anticipated as a result of renovation activities. Substances that could adversely affect ground water are not likely to be introduced or released into the soil. Excavation activities are not anticipated with renovation activities on the proposed elevator construction.

2.5 FLORA AND FAUNA

There is minimal landscaping on Site. Though not observed, it is probable that cats, rats, and mice common to inner city environments are present. Sparrows, doves, finches, and other species common to urban areas have been observed in the area.

Impacts and Mitigation Measures

No significant impact to Flora and Fauna is anticipated as a result of renovation activities.

2.6 AIR QUALITY

Air quality at the Site is considered to be good and meets National Ambient Air Quality Standards (NAAQS) and State ambient Air Quality Standards (SAAQS). Air quality in the vicinity is most likely affected by emission from motor vehicle traffic on roadways.

The State Department of Health (DOH) maintains monitoring locations throughout the state. Data from the Waikiki location was not available. The closest monitoring station is located in Downtown Honolulu. Parameters monitored at this location are carbon monoxide (CO), particulate matter at 10 microns or less (PM10), and sulfur dioxide (SO₂). Measurements reported in the 2003 Annual Summary Hawaii Air Quality Data (HDOH 2003) and applicable NAAQS and SAAQS are found in the following table.

County of Honolulu is performing roadwork and beautification projects in Waikiki, which may increase ambient (daytime) noise levels depending on work being completed.

Impacts and Mitigation Measures

Renovation activities at the Site may increase noise levels during this project. Limiting those activities that may increase noise levels to daylight hours will help to minimize noise impacts during the renovation. DOH Administrative Rules, Title 11, Chapter 46, "Community Noise Control" regulations will be complied with. If noise levels are expected to exceed allowable levels, stated in Chapter 46 rules, a noise permit must be obtained.

Once the project is completed, vehicular traffic is anticipated to be the source of noise at the Site. No significant impacts are anticipated as the volume of traffic will likely be less than existing conditions due to the decreased number of units in the building.

2.8 ARCHAEOLOGICAL AND CULTURAL RESOURCES

Located at the eastern portion of Waikiki, the Site stands at a place that ancient Hawaiians called Kekio, a small community in the large village of grass houses at Waikiki. In old times, it was a landscape of coconuts, streams, and ponds. Toward Honolulu was Muliwai Kukaunahi, one of the three major streams that cut through Waikiki. Toward Diamond Head was an expansive pond that filled during the winter and was dry during the summer. The pond abounded in all manner of wild fowl and fish. Inland were irrigated taro fields that stretched to the valleys of the Koolau mountains.

In ancient times, Waikiki was the center of power of the royalty of the island. Watered by streams flowing out of the Koolau valleys, this was a place where taro was of first quality, ponds produced an incomparable supply of fish, and the ocean was a vast source of all sorts of marine foods.

In the 1700s, warfare in the islands raged and rule of the land changed hands. Kamehameha began his long reign as king of a unified Hawaii in the 1800s. Waikiki was the seat of power, but as foreigners came to the islands in ever greater numbers

2.9 SOCIO-ECONOMIC CONSIDERATIONS

2.9.1 Population and Housing

The Site is located in the Waikiki Neighborhood Area. This area is bordered to the north by Ala Wai Canal, to the east by Kapahulu Avenue, to the west by Ala Wai Yacht Harbor, and to the south by the Pacific Ocean. The area is characterized by numerous hotels, retail stores, restaurants, and other facilities.

According to the U.S. Census Bureau (Census 2000) the Site falls within Census Tract (CT) 18.01, which covers approximately 6 blocks. The population of CT 18.01, according to Census 2000, is 1,185. There were 729 households with an average of 1.63 people per household. The vast majority of the population occupying this area is tourists who are not counted in the census. It is estimated that approximately 6 million people visited the Hawaiian Islands annually, with a majority staying in the Waikiki area.

Impacts and Mitigation Measures

Proposed renovation of the Site into luxury condominiums are not expected to negatively impact the area. The proposed project will be adding residential units to the district.

2.9.2 Economy

Residents living within Census Tract 18.01 have a annual household median income of \$25,865.00. This is well below Honolulu County's annual household median income of \$51,914.00.

Impacts and Mitigation Measures

No adverse impacts to the economy in the vicinity of the Site is anticipated as a result of the proposed project. As the project is increasing the number of residents to the community who will have an income larger than the current median income, a small increase in the area median income may be seen. The proposed renovations will result in short-term economic benefits for the construction industry in Honolulu, though these benefits will not be on a large scale based to the project budget.

2.11 EDUCATION

Public education, provided by the Department of Education, is available. Waikiki is part of the Kaimuki-Kalani Complex Area. There are 3 elementary schools in close vicinity to the Site. The closest middle and high school is located in Kaimuki.

A private all-girls school, serving grades 6-12, is also within close vicinity to the Site. Other private schools (teaching various grades) are available in the Kaimuki area.

Impacts and Mitigation Measures

No significant impact to educational services is anticipated as a result of renovation activities. This is also anticipated at project completion, due to the low number of residential units being proposed.

2.12 RECREATION

Recreational activities in the area mainly consist of water or beach sports taking place at Waikiki Beach, located across Kalakaua Avenue from the Site. "Sunset on the Beach", an evening of food, family activities, and movies is also held at Waikiki Beach at least monthly. The Honolulu Zoo and Kapiolani Park and Bandstand are located minutes from the Site.

Impacts and Mitigation Measures

No significant impact to recreational services is anticipated as a result of renovation activities. This is also anticipated at project completion, due to the low number of residential units being proposed.

2.13 ACCESS AND TRAFFIC

Kalakaua Avenue, a main thoroughfare in Waikiki, borders the Aston Waikiki Beachside Hotel to the south. Traffic direction runs one-way, west to east. Other streets in the area are Uluniu Avenue, Koa Avenue, and Liliuokalani Avenue. These are smaller side streets that are typically one way only. All streets are heavily used by pedestrians. Guests and employees of the Aston Waikiki Beachside Hotel currently park at the Aston Beach Tower Hotel which is located on Liliuokalani Street, approximately 300 feet from

anticipates retaining the current parking agreement with Aston Beach Tower Hotel which would result in three parking stalls per unit. A Conditional Use Permit will be submitted for these parking spaces.

2.14 UTILITIES

The Site is currently connected to electric, water, gas and sewer lines. Companies supplying the area are the Hawaiian Electric Company (HECO), Board of Water Supply, The Gas Company and the Department of Environmental Services, City and County of Honolulu.

Impacts and Mitigation Measures

No significant impact to utility services is anticipated as a result of renovation activities. During construction activities, utility demands are anticipated to be less than regular hotel operations. HECO, the Board of Water Supply, and The Gas Company will be notified and demand is not anticipated to impact supply. Following construction, demand on these services is anticipated to decrease as there are fewer units in the building to supply.

2.15 VISUAL RESOURCE

Currently, buildings immediately to the north and west of the proposed project are the Hyatt convention center and parking lot, both do not have views and would not be a concern from a visual resource perspective. To the east are the Waikiki Circle Tower and the Aston Beach Tower hotels whose westward views are partially obstructed by the existing structure. A new elevator tower in support of federal requirements is proposed for the American Disabilities Act (ADA) compliant elevator. This elevator tower will be constructed on the eastern portion of the building and will enclose a current open area to house a foyer area and elevator access.

Impacts and Mitigation Measures

Negative impacts to visual resources are not expected. Renovations to the building structure will not significantly further impact the view of adjacent buildings. The only major change to the roof top is the addition of an elevator tower that will not exceed current building height. The proposed elevator tower

SECTION 3 RELATIONSHIP TO PLANS, POLICIES, AND CONTROLS

The Site is located in Waikiki, which is subject to Waikiki Special District zoning and is the focus of the City and County of Honolulu, Office of Waikiki Development (OWD). This proposed project intends to follow with the Waikiki Special District Design Guidelines, OWD goals, City and County of Honolulu General Plan, Primary Urban Center Development Plan, and Special Management Area Plan. Appropriate permitting will be obtained from the City and County of Honolulu Department of Planning and Permitting in a timely manner.

3.1 Waikiki Special District Design Guidelines

Waikiki Special District Design Guidelines are being met by the architectural elements that will be incorporated into the proposed project design. The following are design elements that are intended to fulfill Waikiki Special District Design Guidelines. In an effort to convey a Hawaiian sense of place, installation of a curtain wall system using blue glass to relate to the ocean, and metal mullions and stone to create a geometric rhythm suggestive of historic Hawaiian tattoos are used on the exterior of the building. Curved shading devices on the ground floor would be suggestive of ocean waves and will help to soften the look of the building. The existing ground floor retail area will be maintained and converted into a two-story open-air café, keeping with the City's desire for "an indoor-outdoor relationship." Tropical colors and plants will complete the "island feeling" of the Royal Kai Lani. As mentioned previously, renovation work will be done within the existing building structure. Urban design controls (Waikiki Gateways, Significant Public Views, Public Pedestrian Access) will not be significantly impacted by the proposed project. It is anticipated the Royal Kai Lani would further add to the beauty of Waikiki and the basic appeal of a pedestrian-friendly environment.

3.2 Office of Waikiki Development Goals

The OWDs goal is to increase the competitive value of Waikiki as a unique visitor destination. It has three objectives:

- 1) Develop incentives that encourage new investment and reinvestment;

3.4 Primary Urban Center Development Plan

The Primary Urban Center (PUC) Development Plan follows the provisions of the City and County of Honolulu General Plan. The PUC Development Plan seeks to preserve Honolulu's natural, cultural, and scenic resources, promote livable neighborhoods with business districts, parks, and walkable streets, provide in-town housing for all individuals, and promote Honolulu as a leading travel destination. In preserving Honolulu's natural, cultural and scenic resources, special emphasis is placed on historic and cultural sites, natural resource and constraint areas, panoramic views of natural landmarks and urban skyline, access to shoreline and mountain areas, develop stream greenbelts, and provide parks and recreation areas. The proposed project is not anticipated to negatively impact the environment. Cultivation of livable neighborhoods would include a collaborative neighborhood planning system, promotion of mixed land use, cultivation of existing and new "neighborhood centers", and making streets "pedestrian-friendly". In promoting Honolulu as a leading travel destination, the development of a vibrant and livable Waikiki is one of the proposed projects goals. The intent of this project is to add natural elements to the buildings façade while promoting a Hawaiian sense of place by the use of design elements and promoting local culture.

3.5 Special Management Area Plan

Special Management Area Guidelines, as set forth by HRS 205A-26, outlines requirements of proposed developments in special management areas. These requirements include adequate access to publicly owned or used beaches, recreational areas, and natural reserves; adequate and properly located public recreation areas and wildlife preserves are reserved; provisions are made for solid and liquid waste management; any alterations to existing land forms and vegetation and construction of structures shall cause minimal adverse effect to natural resources and scenic and recreational amenities; and alterations should minimize danger from floods, earthquakes, and other natural disasters.

The proposed project intends to keep with the Special Management Area Guidelines requirements of minimizing the impact on the environment by containing renovation activities to the existing structure. It is not anticipated that adverse effects to natural resources and scenic and recreational amenities will occur. Alterations to the structure

SECTION 4 ALTERNATIVES

Under Hawaii Administrative Rules, Title 11, Department of Health, Chapter 200 Environmental Impact Statement Rules, Section 11-200-17(f), it is required that alternatives in which the objectives of the proposed project will be met, need to be evaluated. These alternatives may possibly enhance environmental quality or avoid, reduce, or minimize some or all of the adverse environmental effects, costs, and risks. The following are alternatives that have been evaluated.

4.1 NO ACTION ALTERNATIVE

Under the No Action alternative, the Site would be kept as is with no changes or alterations. This alternative would not accomplish the goals of this proposed project.

4.2 ALTERNATIVE SITES AND DESIGNS

This EA discusses the proposed renovation at the current Aston Waikiki Beachside Hotel. No alternative sites or building designs were evaluated.

4.3 THE PREFERRED ALTERNATIVE

The proposed renovation is the preferred alternative because they fulfill the goals of the proposed project and follow Waikiki Special District Design Guidelines, Office of Waikiki Development goals City and County of Honolulu General Plan, Primary Urban Center Development Plan, and Special Management Area Plan.

SECTION 5 PERMITS AND APPROVALS

The following permits and approvals are required for the progression of this project. All permits will be obtained in accordance with approving agency guidelines.

- Environmental Assessment
- Department of Planning and Permitting, Building Permit
- Department of Planning and Permitting, Special Management Area Use Permit – Major
- Department of Planning and Permitting, Waikiki Special District Permit – Minor
- Department of Planning and Permitting, Conditional Use Permit – Minor
- Department of Planning and Permitting, Street Tree Review
- Department of Planning and Permitting, Park Dedication (Park Dedication requirements will be fulfilled by paying a fee)
- Department of Planning and Permitting, Site Development Division Application

SECTION 6 DETERMINATION OF FONSI

The proposed project involves the renovation of the Aston Waikiki Beachside Hotel, located at 2452 Kalakaua Avenue in Honolulu, Oahu, Hawaii. In accordance with Hawaii Revised Statute, Title 11, Department of Health, Chapter 200, Section 14, potential impacts of the proposed project have been reviewed. The following is a summary of the criteria discussed in the statute.

- (1) Involves an irrevocable commitment to loss or destruction of any natural or cultural resource;*

The proposed project is not anticipated to impact any natural or cultural resource. There is little potential for encountering such resources as the Site is currently developed, and the proposed project calls for renovation of the existing structure.

- (2) Curtails the range of beneficial uses of the environment;*

The proposed project is zoned for and located within a resort mixed use precinct and falls within the Waikiki Special District (WSD). The Site is also part of the City and County of Honolulu, Office of Waikiki Development (OWD). The goals and vision of the WSD and OWD, to increase Waikiki's attractiveness as a tourist destination while preserving the environment, are being met by this renovation.

- (3) Conflicts with the state's long-term environmental policies or goals and guidelines as expressed in chapter 344, HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders;*

The proposed project is not anticipated to conflict with the state's long-term environmental policies or goals and guidelines as expressed HRS Chapter 344.

- (4) Substantially affects the economic welfare, social welfare, and cultural practices of the community or State;*

Site environment is anticipated as the proposed project calls for renovation of the existing structure.

(10) Detrimentially affects air or water quality or ambient noise levels;

The proposed project is not anticipated to detrimentally impact any air or water quality or ambient noise levels. During the proposed project, these parameters will be monitored. Any exceedances in local, state, or federal rules or regulations will be mitigated to minimize their effects to the area.

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

The proposed project is not anticipated to impact any natural or cultural resource. There is little potential for encountering such resources as the Site is currently developed, and the proposed project calls for renovation of the existing structure. The Site does not fall within a Flood Hazard District.

(12) Substantially affects scenic vistas and viewplanes identified in county or state plans or studies; or,

The proposed project is not anticipated to impact any scenic vistas or viewplanes. Coastal view planes will not be impacted by the Site. There is little potential for this occurring as the proposed project calls for renovation of the existing structure.

(13) Requires substantial energy consumption.

The proposed project is not anticipated to require substantial energy consumption. At project completion, it is anticipated that energy consumption will decrease as there would be less people occupying the building.

SECTION 7 CONSULTATION

The following is a listing of agencies and organizations that have been or will be consulted during this Environmental Assessment.

7.1 PRE-ASSESSMENT CONSULTATION

The following agencies and organizations were contacted during the preparation of the Draft EA. No written comments were received.

State Agencies

Department of Health, Office of Environmental Quality Control

Department of Land and Natural Resources

County Agencies

Department of Planning and Permitting

7.2 DRAFT EA CONSULTATION

The following agencies and organizations were contacted during the preparation of the Draft EA. Comments were solicited during the 30-day public review period. Comments and Response to Comments are in Appendix A.

State Agencies

Department of Business, Economic Development and Tourism (DBEDT)

Department of Health, Office of Environmental Quality Control

Department of Health

- Noise, Radiation & Indoor Air Quality Branch
- Clean Air Branch

Office of Economic Development – Waikiki

Ala Moana Satellite City Hall

Waikiki Neighborhood Board

Councilmember Charles Djou

Libraries and Depositories

Hawaii State Library, Waikiki-Kapahulu Branch

Organizations

Honolulu Advertiser

Honolulu Star Bulletin

Surrounding Landowners

SECTION 8
REFERENCES

Census 2000. U.S. Census Bureau. <http://factfinder.census.gov>

City and County of Honolulu, Department of Planning and Permitting, 2002. *Waikiki Special District Design Guidelines*.

Hawaii Department of Health (HDOH,) 2003. *2003 Annual Summary, Hawaii Air Quality Data*.

Mink, J. F. and S. L. Lau, 1990. *Aquifer Identification and Classification for the Island of Oahu: Groundwater Protection Strategy for Hawaii*. Water Resources Research Center, University of Hawaii at Manoa, Technical Report No. 179. February.

U.S. Department of Agriculture, Soil Conservation Service, 1972. *Soil Survey of the Islands of Kauai, Oahu, Maui, Molokai, and Lanai, State of Hawaii*.

Appendix A
Comments from Consulted Agencies
and
Response to Comments

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 523-4432 • FAX: (808) 527-6743
DEPT. WEB SITE: www.honolulu.gov • CITY WEB SITE: www.honolulu.gov

MUFI HANNEMANN
MAYOR



HENRY ENG, FAICP
ACTING DIRECTOR

DAVID K. TANOUE
DEPUTY DIRECTOR

2004/ED-34 (TC)

February 4, 2005

Ms. Rachel Okoji
AMEC Earth & Environment, Inc.
3375 Koapaka Street, Suite F-251
Honolulu, Hawaii 96819

Dear Ms. Okoji:

SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT - 2004/ED-34
Project: Royal Kai Lani - 10-unit Condominium
Location: 2452 Kalakaua Avenue - Waikiki
Tax Map Key: 2-6-023: 004
Received: December 28, 2004

We are forwarding copies of all comments we have received to date on the Draft Environmental Assessment (EA) for the above-referenced project.

In accordance with the provisions of Chapter 343, Hawaii Revised Statutes (HRS), you must respond, in writing, to these and any other comments that were received during the 30-day comment period, which began with publication of a notice of availability of the Draft EA in The Environmental Notice on January 8, 2005. The Final EA must include these comments and responses, as well as the revised text, where needed.

Also, we have reviewed the Draft Environmental Assessment (DEA) for the above project and have the following comments:

1. Section 5 - Permits and Approvals - The stated \$7 million project cost exceeds the \$125,000 threshold to process a minor SMA permit. Therefore, a Major SMA permit must be processed. While Chapter 25, Special Management Area, ROH, does not consider "nonstructural improvements to existing commercial structures" or "interior alterations" as

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 523-4414 • FAX: (808) 527-6743
DEPT. WEB SITE: www.honolulu.gov • CITY WEB SITE: www.honolulu.gov

JEREMY HARRIS
MAYOR



ERIC G. CRISPIN, AIA
DIRECTOR

BARBARA KIM STANTON
DEPUTY DIRECTOR

2004/ELOG-2320(TC)
UDB Misc

December 8, 2004

Donald J. Clifford, AIA/PMI
Clifford Projects, Inc.
841 Bishop Street, Suite 300
Honolulu, Hawaii 96813

Dear Mr. Clifford:

SUBJECT: REQUEST FOR CLARIFICATION

Project: Royal Kai Lani - 10-unit Condominium
Location: 2452 Kalakaua Avenue - Waikiki
Tax Map Key: 2-6-023: 004

We have reviewed your request for clarification for the above-mentioned project (date-stamped October 15, 2004) and offer the following comments. They are listed in the same order as your letter.

1. Solid Canopy - It is our understanding that the solid canopy (or roof overhang) refers to the curved roof form on the elevator penthouse. In accordance with Section 21-9.80-4(a)(4) of the Land Use Ordinance (LUO) regarding buildings over 60 feet in height, roof eaves may extend more than 42 inches into the required yard, street setback or height setback if the resulting roof form is integral to a cohesive, coherent design character for the structure. In order for DPP to make a proper assessment, the height setback line should be shown in a building section or elevation along with the amount of encroachment by the roof overhang into the transitional height setback.

Donald J. Clifford, AIA/PMI

Page 3

December 8, 2004

showing finish floor elevations and/or floor-to-floor heights, purpose for converting the existing maintenance and office into a mechanical room, and discuss specific replacement or retrofit requirements for the mechanical equipment.

7. Transitional Height Setback - The proposed project must comply with Section 21-9.80-6(c)(2) of the LUO regarding transitional height setbacks. Please note that any proposed encroachment into the transitional height setbacks may require a zoning variance if not permitted in the Waikiki Special District regulations. We are unable to determine if the proposed relocation of existing nonconforming building volume can be achieved without a zoning variance at this time. More information detailing the existing and proposed volume changes must be provided such that there is a decrease in nonconformity.
8. Proposed Accessible Elevator - In order for DPP to make a proper assessment (per Section 21-9.80(e)(5) regarding nonconformity), please provide more information and justifications, i.e., showing the amount of required floor area and alternative accessible elevator locations and configurations that were investigated.
9. Floor Area Exchange - See Item 6 above.
10. Environmental Assessment (EA) - See Item 8 above.

Please note that it appears that the proposed curtain wall system may be adding floor area if it is attached to the existing exterior walls and structures. If true, this additional floor area should be offset by other areas in the structure so as not to increase its nonconforming density.



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Fax (808) 528-5379
www.amec.com

05/20/2005

Mr. Henry Eng
Director
Department of Planning and Permitting
650 South King Street
7th Floor
Honolulu, Hawaii 96813

Subject: **DRAFT ENVIRONMENTAL ASSESSMENT, ROYAL KAI LANI,
TAX MAP KEY: 2-6-023:004**

Dear Mr. Eng:

Thank you for your letter dated February 4, 2005, concerning the Draft Environmental Assessment, Royal Kai Lani. Responses to your comments are listed below.

1. Permits and Approvals – A Major Special Management Area Use Permit will be submitted to Department of Planning and Permitting for this project.
2. In regards to comments submitted to Donald Clifford (Clifford Projects, Inc.) in a letter dated December 8, 2004, comment 10 is titled "Environmental Assessment." This comment refers to the proposed accessible elevator. The amount of floor area required for the proposed accessible elevator shaft is approximately 100 square feet. No other alternative locations or configurations were investigated due to access and the buildings current configuration. All other comments pertain to design and architectural elements.
3. A Site Development Division Application form will be submitted for sewer connection.

We appreciated your participation in the environmental assessment review process.

Sincerely,

Rachel Okoji

Tenny

FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU

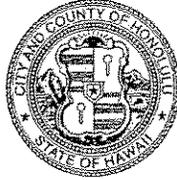
3375 KOAPAKA STREET, SUITE H425 • HONOLULU, HAWAII 96819-1869
TELEPHONE: (808) 831-7761 • FAX: (808) 831-7750 • INTERNET: www.honolulufire.org



ATTILIO K. LEONARDI
FIRE CHIEF

JOHN CLARK
DEPUTY FIRE CHIEF

MUFI HANNEMANN
MAYOR



January 31, 2005

TO: HENRY ENG, FAICP, ACTING DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING

FROM: ATTILIO K. LEONARDI, FIRE CHIEF

SUBJECT: CHAPTER 343, HAWAII REVISED STATUTES
DRAFT ENVIRONMENTAL ASSESSMENT
PROJECT: ROYAL KAI LANI
APPLICANT: RKL BEACHSIDE, LLC
LANDOWNER: RKL BEACHSIDE, LLC
AGENT: AMEC EARTH & ENVIRONMENTAL, INC.
LOCATION: 2452 KALAKAUA AVENUE
WAIKIKI, OAHU, HAWAII

TAX MAP KEY: 2-6-023: 004
REQUEST: WAIKIKI SPECIAL DISTRICT PERMIT (MINOR)
2004/ED-34

PROPOSAL: CONVERT AN EXISTING 79-ROOM HOTEL TO A
TEN-UNIT RESIDENTIAL CONDOMINIUM

RECEIVED
FEB 2 11 2 05

We received your memorandum dated January 7, 2005, requesting our review and comments on the above-mentioned project.

The proposed project will not adversely impact services provided by the Honolulu Fire Department.

Should you have any questions, please call Battalion Chief Lloyd Rogers of our Fire Prevention Bureau at 831-7778.

ATTILIO K. LEONARDI
Fire Chief

AKL/SK:bh



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a division of AMEC Americas Limited
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03/29/2005

Mr. Attilio K. Leonardi
Fire Chief
Honolulu Fire Department
3375 Koapaka Street
Suite H-425
Honolulu, Hawaii 96819-1869

Subject: **DRAFT ENVIRONMENTAL ASSESSMENT, ROYAL KAI LANI,
TAX MAP KEY: 2-6-023:004**

Dear Mr. Leonardi:

Thank you for your letter dated January 31, 2005, concerning the Draft Environmental Assessment, Royal Kai Lani, TMK 2-6-023:004.

We acknowledge that the Honolulu Fire Department anticipates the proposed project would not adversely impact their services.

We appreciated your participation in the environmental assessment review process.

Sincerely,

A handwritten signature in black ink, appearing to read "Rachel Okoji". The signature is fluid and cursive, with a large loop at the end.

Rachel Okoji

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU

801 SOUTH BERETANIA STREET
HONOLULU, HAWAII 96813 - AREA CODE (808) 529-3111
<http://www.honoluluupd.org>
www.honolulu.gov

MUFI HANNEMANN
MAYOR



BOISSE P. CORREA
CHIEF

GLEN R. KAJIYAMA
PAUL D. PUTZULU
DEPUTY CHIEFS

OUR REFERENCE CS-KP

January 31, 2005

TO: HENRY ENG, FAICP, ACTING DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING

FROM: BOISSE P. CORREA, CHIEF OF POLICE
HONOLULU POLICE DEPARTMENT

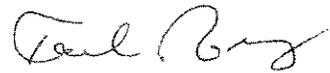
SUBJECT: DRAFT ENVIRONMENTAL ASSESSMENT, ROYAL KAI LANI,
TAX MAP KEY: 2-6-023: 004

Thank you for the opportunity to review and comment on the subject project.

This project should have minimal impact on the services and facilities of the Honolulu Police Department. However, there may be inevitable construction-related dust, noise, and traffic complaints.

If there are any questions, please call Major Thomas Nitta of District 6 at 529-3361 or Ms. Carol Sodetani of the Support Services Bureau at 529-3658.

BOISSE P. CORREA
Chief of Police

By 
KARL GODSEY
Assistant Chief of Police
Support Services Bureau



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03/29/2005

Mr. Boisse P. Correa
Chief of Police
Honolulu Police Department
801 South Beretania Street
Honolulu, Hawaii 96813

Subject: **DRAFT ENVIRONMENTAL ASSESSMENT, ROYAL KAI LANI,
TAX MAP KEY: 2-6-023:004**

Dear Mr. Correa:

Thank you for your letter dated January 31, 2005, concerning the Draft Environmental Assessment, Royal Kai Lani, TMK 2-6-023:004.

We acknowledge that the Honolulu Police Department anticipates the proposed project would result in minimal impact on their services and facilities.

We appreciated your participation in the environmental assessment review process.

Sincerely,

A handwritten signature in black ink, appearing to read "Rachel Okoji", written in a cursive style.

Rachel Okoji

LINDA LINGLE
GOVERNOR OF HAWAII



GENEVIEVE SALMONSON
DIRECTOR

STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

235 SOUTH BERETANIA STREET
SUITE 702
HONOLULU, HAWAII 96813
TELEPHONE (808) 586-4185
FACSIMILE (808) 586-4186
E-mail: oeqc@health.state.hi.us

January 26, 2005

Henry Eng
Department of Planning and Permitting
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

Attn: Anthony Ching

Dear Mr. Eng:

Subject: Draft Environmental Assessment (EA), **Royal Kai Lani**

We have the following comments to offer:

Two-sided pages: In order to reduce bulk and save on paper, please print on both sides of the pages in the final document.

Cultural impacts assessment:

A cultural impacts assessment was missing from the draft EA. This is an assessment of the project's impacts to current cultural practices. In the final EA include such an assessment.

If the subject area is in a developed urban setting, cultural impacts must still be assessed. Many incorrectly assume that the presence of urban infrastructure effectively precludes consideration of current cultural factors. For example, persons are known to gather kauna'oa, 'ilima, 'uhaloa, noni or ki on the grassy slopes and ramps of the H-1 freeway and some state highways on the neighbor islands. Certain landmarks and physical features are used by Hawaiian navigators for sailing, and the lines of sight from landmarks to the coast by fisherman to locate certain fishing spots. Blocking these features by the construction of buildings or tanks may constitute an adverse cultural impact. Your discussion should describe the process undertaken in the assessment process with a concluding analysis clearly stated.

For assistance in the preparation refer to our *Guidelines for Assessing Cultural Impacts*. Contact our office for a paper copy or go to our homepage at <http://www.state.hi.us/health/oeqc/guidance/index.html>.

If you have any questions call Nancy Heinrich at 586-4185.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Salmonson".

GENEVIEVE SALMONSON
Director

c: Rachel Okoji, AMEC Earth & Environment



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03/29/2005

Ms. Genevieve Salmonson
Director
Office of Environmental Quality Control
State of Hawaii
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

Subject: **DRAFT ENVIRONMENTAL ASSESSMENT, ROYAL KAI LANI,
TAX MAP KEY: 2-6-023:004**

Dear Ms. Salmonson:

Thank you for your letter dated January 26, 2005, concerning the Draft Environmental Assessment, Royal Kai Lani. Responses to your comments are listed below.

1. In an effort to reduce bulk and save on paper, the Final Environmental Assessment will be printed double-sided
2. Cultural Impacts Assessment: The Final Environmental Assessment will include discussion regarding potential impacts on cultural practices and resources. At your recommendation, the Office of Hawaiian Affairs and the Waikiki Neighborhood Board were queried on their knowledge of cultural practices or resources in the affected area. A presentation to the Waikiki Neighborhood Board was made in November 2004 informing the community of the proposed project. The Draft Environmental Assessment was also sent to them via hard copy and email for their review. No comments were received by the end of the commenting period. Office of Hawaiian Affairs did not know of any cultural practices or resources in the area, but suggested contacting the Oahu Burial Council. An attempt to contact the Oahu Burial Council was made, but no response was received. No cultural practices and resources are anticipated to be impacted by the proposed project.

We appreciated your participation in the environmental assessment review process.

Sincerely,

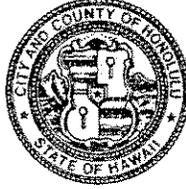
Rachel Okoji

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 523-4564 • Fax: (808) 523-4567
Website: www.honolulu.gov

2005 JAN 20 PM 9 59
MUIF HANNEMANN
MAYOR

CITY AND COUNTY OF HONOLULU



TIMOTHY E. STEINBERGER, P.E.
ACTING DIRECTOR

WAYNE HASHIRO
DEPUTY DIRECTOR

90242

January 18, 2005

TO: HENRY ENG, FAICP, ACTING DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING

FROM:  TIMOTHY E. STEINBERGER, P.E., ACTING DIRECTOR

SUBJECT: ROYAL KAI LANI
PROJECT REFERENCE NO. 2004/ED-34 (TC)

ATTENTION: ANTHONY CHING

Thank you for the opportunity to review and provide comments to the referenced draft environmental assessment.

We note that the applicant intends to fulfill the City's Park Dedication requirements by payment of an in-lieu fee. This proposal is logical and acceptable to us. We have no other comments to offer.

Please call Mr. Terry Hildebrand, Planner, at extension 4696 if there are any questions.

TES:ei

cc: Lester K.C. Chang, Acting Director, Department of Parks and Recreation



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USA 96818
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Fax [808] 528-5379
www.amec.com

03/29/2005

Mr. Timothy E. Steinberger
Acting Director
Department of Design and Construction
650 South King Street
11th Floor
Honolulu, Hawaii 96813

Subject: **DRAFT ENVIRONMENTAL ASSESSMENT, ROYAL KAI LANI,
TAX MAP KEY: 2-6-023:004**

Dear Mr. Steinberger:

Thank you for your letter dated January 18, 2005, concerning the Draft Environmental Assessment, Royal Kai Lani.

We acknowledge that the Department of Design and Construction accepts the decision to fulfill the City's Park Dedication requirements by payment of an in-lieu fee.

We appreciated your participation in the environmental assessment review process.

Sincerely,

A handwritten signature in black ink, appearing to read "Rachel Okoji".

Rachel Okoji

BOARD OF WATER SUPPLY

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



MUFI HANNEMANN, Mayor

EDDIE FLORES, JR., Chairman
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CLIFFORD S. JAMILE
Manager and Chief Engineer

DONNA FAY K. KIYOSAKI
Deputy Manager and Chief Engineer

175 JAN 14 PM 2 58
January 13, 2005

TO: HENRY ENG, FAICP, ACTING DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING
K. J. J. J.

FROM: CLIFFORD S. JAMILE, MANAGER AND CHIEF ENGINEER
BOARD OF WATER SUPPLY

ATTENTION: ANTHONY CHING

SUBJECT: Your Letter of January 12, 2005 on the Draft Environmental Assessment
for Royal Kai Lani, TMK:2-6-23:4, 2004/ED-34(TC)

The existing water system is presently adequate to accommodate the proposed development.

The availability of water will be confirmed when the building permit is submitted for approval. When water is made available, the applicant will be required to pay our Water System Facilities Charges for resource development, transmission and daily storage.

The proposed conversion is subject to Board of Water Supply cross-connection control and backflow prevention requirements prior to issuance of the Building Permit Application.

If you have any questions, please contact Joseph Kaakua at 748-5442.

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING, ROOM 555
601 KAMOKILA BOULEVARD
KAPOLEI, HAWAII 96707

PETER T. YOUNG
CHAIRPERSON
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COMMISSION ON WATER RESOURCE MANAGEMENT

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DEPUTY DIRECTOR - LAND

YVONNE Y. IZU
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
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CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

November 30, 2004

Ms. Rachel Okoji
Industrial Hygienist
AMEC Earth & Environmental, Inc.
Airport Industrial Center
3375 Koapaka Street, Suite F251
Honolulu, Hawaii 96819

LOG NO: 2004.3469
DOC NO: 04111107
Architecture

Dear Ms. Okoji:

**SUBJECT: Review of Draft Environmental Assessment (DEA) for the Royal Kai Lani
Located at 2452 Kalakaua Avenue
Honolulu, Waikiki, Hawaii
TMK: (1) 2-6-023:004**

Thank you for transmitting the DEA for the Royal Kai Lani with plans and building elevations. The propose project is the renovation of the 12-story 79-unit Aston Waikiki Beachside Hotel into a 10-unit luxury condominium, the Royal Kai Lani.

Architectural Comments

We support efforts to reinvest in Waikiki, as well as efforts to comply with the vision of the Waikiki Special District Design Guidelines which conveys a Hawaiian sense of place and historic architectural references. The building was built in 1966, and later renovated in 1990. Hence, it does not meet the 50-year-old criteria for eligibility for the State Register for Historic Places, nor has it retained its integrity. At this time for architecture concerns, we believe there are "no historic properties affected."

Archaeological Comments

According to you, a new ADA compliant elevator, requiring a deep foundation system is proposed. We understand that the elevator will be installed in the footprint of the existing basement and previous excavation of the basement has exceeded the expected depth of finding significant historic sites such as cultural deposits or human burials. Therefore we believe that "no historic properties will be affected" by this action activities.

Thank you for the opportunity to comment. Should you have any questions regarding architectural concerns please call Thomas Lim at 692-8030. Should you have any questions regarding archaeological concerns please call Elaine Jourdane at 692-8027. Should you have any questions regarding cultural concerns please call Nathan Napoka at 587-0192.

Aloha,

Handwritten signature of Melanie A. Chinen.
Melanie A. Chinen, Administrator
State Historic Preservation Division

TL:jen

c: Van Horn Diamond, Chair, OIBC
Nathan, Napoka, History and Culture Branch



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a division of AMEC Americas Limited
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USA 96818
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www.amec.com

03/29/2005

Ms. Melanie A. Chinen
Administrator, State Historic Preservation Division
Department of Land and Natural Resources
State of Hawaii
601 Kamokila Boulevard
Kapolei, Hawaii 96707

Subject: **DRAFT ENVIRONMENTAL ASSESSMENT, ROYAL KAI LANI,
TAX MAP KEY: 2-6-023:004**

Dear Ms. Chinen:

Thank you for your letter dated November 30, 2004, concerning the Draft Environmental Assessment, Royal Kai Lani, TMK 2-6-023:004.

We acknowledge that the Department of Land and Natural Resources, Historic Preservation Division anticipates that "no historic properties will be affected" by the proposed project in regards to archeological considerations. It is further acknowledged that the Department of Land and Natural Resources, Historic Preservation Division supports the proposed projects compliance with the vision of the Waikiki Special District Design Guidelines. As the structure does not meet the criteria for State Register for Historic Places, the proposed project has been designated as "no historic properties affected."

We appreciated your participation in the environmental assessment review process.

Sincerely,

A handwritten signature in black ink, appearing to read "Rachel Okoji". The signature is fluid and cursive, with a long, sweeping tail that extends to the right.

Rachel Okoji

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU650 SOUTH KING STREET, 3RD FLOOR - HONOLULU, HAWAII 96813
TELEPHONE: (808) 523-4520 • FAX: (808) 523-4730 • INTERNET: www.cc.honolulu.hi.us

2005 FEB 8 AM 10 31

MUIF HANNEMANN
MAYORDEPARTMENT OF PLANNING
& PERMITTING
CITY & COUNTY OF HONOLULUEDWARD Y. HIRATA
ACTING DIRECTOR

TP1/05-89803R

February 7, 2005

MEMORANDUM

TO: HENRY ENG, FAICP, ACTING DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING

FROM: EDWARD Y. HIRATA, ACTING DIRECTOR

SUBJECT: ROYAL KAILANI - 2004/ED-34 (TC)

In response to your January 7, 2005 letter, we have reviewed the draft environmental assessment (EA) for the subject project. The following comments are the result of this review:

1. On Page 2-8, the second sentence in Section 2.10.2 PUBLIC TRANSIT should be revised to read, "Oahu Transit Services (operator of TheBus) is contracted by the Department of Transportation Services to provide fixed route bus service."
2. Access and traffic impacts of the project are discussed on Pages 2-9 and 2-10 of the draft EA. The complete reliance on the on-street loading zone on Kalakaua Avenue is not acceptable. The volume of loading activities should be estimated and sufficient on-site space should be provided.
3. Section 2.13 ACCESS AND TRAFFIC also discusses the available parking for the project based on the current parking agreement with the Aston Beach Tower Hotel. The parking needs for the proposed project should be assessed and accommodated based on existing City LUO (Land Use Ordinance) standards.

Should you have any questions regarding these comments, please contact Faith Miyamoto of the Transportation Planning Division at Local 6976.

A handwritten signature in cursive script, appearing to read "Edward Y. Hirata", written over a horizontal line.
EDWARD Y. HIRATA



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a division of AMEC Americas Limited
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Honolulu Hawaii
USA 96818
Tel: (808) 545-2462
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03/29/2005

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

Subject: **DRAFT ENVIRONMENTAL ASSESSMENT, ROYAL KAI LANI,
TAX MAP KEY: 2-6-023:004**

Dear Mr. Hirata:

Thank you for your letter dated February 7, 2005, concerning the Draft Environmental Assessment, Royal Kai Lani. Responses to your comments are listed below.

1. Page 2-8, second sentence has been revised to read, "Oahu Transit Services (operator of TheBus) is contracted by the Department of Transportation Services to provide fixed route bus service."
2. Comment noted. The volume of loading activities will be estimated and sufficient on-site space will be appropriated as available.
3. Access and Traffic: As stated in the Draft Environmental Assessment, parking needs for the proposed development will be in accordance with Land Use Ordinance (LUO) Article 6 at one parking stall per unit. Additionally, the developer intends to increase the number of stalls per unit to two.

We appreciated your participation in the environmental assessment review process.

Sincerely,

Rachel Okoji