



August 01, 2012

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**Re: Draft Environmental Assessment for 2121 Kuhio Avenue Development**

Thank you for including the Waikiki Neighborhood Board in the review process for the above-referenced project. The Board is aware that this project is a revision of a development that was previously reviewed under various procedures and that a FONSI was issued in 2006 for a similar project on this site. Due to the significant differences between the previously approved and current proposals, as well as the age of the previous FONSI (5+ years), the Board is treating this as a new development for Chapter 343 Environmental Assessment review purposes.

**General Comments:**

The visual simulations, site-line analyses and elevations shown in Appendix I and VI are appreciated as they truly demonstrate to the public the potential visual impacts from this project.

**Page 11 – Physical Characteristics**

The tower is proposed to exceed the zoning height limit by 50 feet. While we understand that a formal zoning variance is not required due to recent revisions to the LUO, an explanation is needed why the additional 50 feet is proposed/required for this development. Regardless of this development's impact or lack of impact to visual site-lines, a disclosure of the rationale for exceeding height limits is needed under provisions of Chapter 343.

**Page 13 – Flora**

This section describes the iconic banyan tree at the corner of Kuhio and Kalaimoku Streets. However, Section XII on Page 37 is silent on possible construction impacts to the banyan tree and any proposed mitigation measures to address these impacts. Provide a description of what could occur to the banyan tree during the construction phase and what arborist-sanctioned mitigation measures are proposed to mitigate this impact. The Board then intends to request that the City codify these measures as conditions of approval for a future Major Special District permit and subsequent building permit(s).

**Page 20 - PUC Development Plan**

The Board appreciates your discussion of, and efforts at compliance with, the PUC Development Plan, especially with regard to policies related to walking, pedestrians and non-vehicular mobility. The provision of significant setbacks for landscaping, and non-fenced, publicly-accessible open space along Kuhio Avenue will enhance the pedestrian experience in compliance with a range of policies for Waikiki. While the provision of bicycle racks for employees is an appropriate endeavor,

the Board recommends that ample, secure and convenient bicycle storage space be provided for hotel guests, employees and possibly for the public.

**Page 22 – Promote a Hawaiian Sense of Place**

**Page 26 – Design Guidelines**

The Waikiki Special District Design Guidelines state that:

- *‘the long axis of all new high rise structures should be oriented in a mauka-makai direction to minimize obstruction of mauka views...’*
- *‘building forms which produce narrow towers are preferred’*
- *‘buildings with a series of graduated, stepped forms are preferred for new projects’*

The structure as proposed exceeds the zoning height limit, is not graduated in scale and has a Diamond Head-‘Ewa orientation. These aspects are inconsistent with the Waikiki Special District Design Guidelines and zoning regulations. While the developer has argued that these features may be warranted from a design perspective, a discussion is nonetheless needed outlining the rationale for non-compliance with design criteria. Stating and/or demonstrating visually that impacts will not be significant, does not negate the need to provide the public with a rationale for pursuing design non-compliance.

We understand a “Hawaiian Sense of Place” is open to subjectivity. However, the overarching theme in the Waikiki Special District Design Guidelines is *“using elements with a recognizable symbolic relationship to Hawaii’s environment, people or culture”*. While the description of landscaping, articulation and resultant shadowing moves towards this goal, any building elements contributing to a Hawaiian sense of place are lacking in the structural renderings shown in the Draft EA.

The Design Guidelines note that *‘all materials should be non-reflective’* and *‘the use of...darkly tinted glass...should be avoided...or very limited in use’*. The Kuhio Avenue elevation appears to be clad in reflective gray/green glass. And while building articulation is achieved, its uninterrupted repetition across almost the entire width of the structure, adds to visual bulk and monolithic massing from public right-of-ways. This is especially true on the Kalakaua Avenue side of the structure and as visible from Fort DeRussy public areas.

The previously approved building design from 2006 described a preferred alternative building design with a mauka/makai orientation. In describing the previously-approved building plan, page 57 of the Final EA of 2006 states:

*“The mauka-makai tower orientation was chosen because it is the Waikiki Special District Design Guidelines’s recommended building orientation intended to minimize impacts to public mauka/makai views”.*

and

*“Because the tower is generally located centrally on the property, the tower mass will appear diminished and it will fit well within the context of the site”.*

Explain if and how the mauka-makai discussion from the 2006 FEA is applicable or (not applicable) to the current proposed development.

A bifurcated or graduated/stepped tower and/or a mauka-makai-oriented structure design should be pursued in order to comply with Waikiki Special District Design Guidelines. In addition, the Board recommends that design elements be added to break the horizontality and visual bulk of the structure. It is imperative that compliance with all applicable design criteria be demonstrated fully, including those related to a Hawaiian sense of place. Where relief is requested from the code, an explanation of why the relief is being pursued in the first place, is needed.

In the absence of the above design concerns being addressed adequately in the Final EA, this Board believes the public visual impacts from this proposed development are significant under review provisions of HRS Chapter 343, a FONSI cannot be issued, and the preparation of an EIS would therefore be warranted.

### **Page 23 – Multi-Modal Transportation in Waikiki**

Free parking induces increased vehicle use, congestion, noise and air pollution, all significant impacts to our neighborhood. To mitigate these impacts it is recommended that free parking not be provided for employees. If vehicle parking is provided free for employees, it is recommended that transit passes be provided for employees using mass transit, with similar incentives provided to employees walking and biking to work. It is also recommended that the sale of condo-hotel units be decoupled from the sale of any associated parking stalls in order to incentivize savings for unit owners choosing to go car-less. We would finally recommend that the developer consider making space in this project available for a car-share enterprise, provide ample electric car recharging stations and provide free parking for electric vehicles. All of the above recommendations are designed to mitigate traffic, noise, air pollution and greenhouse gas (GHG) emission impacts associated with the development of this project.

Waikiki is currently in the process of completing a Circulator Study to compliment the rail system terminating at the Ala Moana Center. This study may propose features that impact your proposed development access. We recommend that you consult with the City to ensure your proposal will not be contrary to what is proposed in the Circulator Study.

### **Page 27 - Landscaping**

For landscaping, use xeriscape, native species to reduce the need for artificial irrigation. If irrigation is needed, use a rainwater capture/storm drain/recycled graywater system instead of potable, piped water.

### **Page 29 – Parking**

Based on the discussion of zoning requirements and parking agreements with the building at 2100 Kalakaua, there is a total requirement for 160 parking spaces at the new development. The development is currently proposing 220 parking spaces; 60 more than required. In the Final EA, explain why the developer is exceeding zoning code parking requirements and why this number of parking spaces is warranted.

### **Page 32 to 33 – Ground Level Features/Features in Required Yard**

The provision of an open, non-fenced and publicly-accessible landscaped plaza and the preservation of the historic banyan tree on the property for public enjoyment, are excellent features of the project design and are consistent with Waikiki Special District Design Guidelines and the PUC Development Plan.

### **Page 37 – Impacts and Proposed Mitigation Measures**

The access and transportation section discusses movements, impacts and mitigations as they pertain to vehicles only. This section lacks any holistic discussion of planning for transit, bicycles,

pedestrians or any other non-vehicle modes of transportation. Explain how space will be allocated for a future bike lane/shared lane, pedestrians and if any bus stops/routes will be impacted or enhanced by this development.

**Page 38 to 43 – Water, Energy and Waste Discussion**

We appreciate your commitment to pursuing LEED certification. While Honolulu does not require LEED certification for new developments at this time, we encourage you to exhaust all possible sustainable features for the development and operation of your proposed facility.

The following are recommended approaches/operations to ensure that your development will not have significant impacts on our island resources.

- Seek to achieve a 'net-zero' development in all aspects of construction and operation.
- Use catchments and grey water for landscaping and other water conserving features at the new development. Use of potable water for landscaping is not an acceptable sustainable approach.
- Reduce construction waste to the maximum degree possible. Use recycled, local and/or sustainable materials throughout the new development's construction and for furnishings, fixtures and eventual operation.
- Construct a dry well system, catchments or other ways to reduce drainage flow off the property and to allow grey water storage for uses on the property.
- Reduce generation of solid waste through use of biodegradable materials, recycling and reuse. Implement a robust, on-going recycling program for residents, visitors and employees.
- Incorporate solar water heaters, solar PV systems, micro-turbine (canister-type) wind turbines, green roofs and free parking for electric vehicles. Orient the building to take advantage of trade winds and other features of the Waikiki micro-climate.

Mahalo for your consideration of the above comments on the Draft EA. We look forward to publication of the final EA or subsequent EIS which adequately addresses concerns noted by this Board, agencies and the general public.

Sincerely,



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Waikiki Neighborhood Board  
Development Review