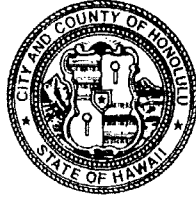


DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

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2013/ELOG-978(BA)
A99-728

June 27, 2013

Ms. Jobie M. K. Masagatani, Chairman
Hawaiian Homes Commission
Department of Hawaiian Home Lands
P.O. Box 1879
Honolulu, Hawaii 96805

Dear Ms. Masagatani:

SUBJECT: Conceptual Urban Design Plan
Hawaii DeBartolo LLC
Ka Makana Alii Development – East Kapolei
Tax Map Key 9-1-016: 142

2013 JUL - 3 A 7:33
LAND USE COMMISSION
STATE OF HAWAII

Thank you for the opportunity to comment on the subject Conceptual Urban Design Plan (UDP) dated May 2013 as required by the State Land Use Commission's (SLUC) decision under Document No. 99-728(c). We provide the following comments:

General

Phase 2 of the development is not currently included in the UDP. For a complete and cohesive vision for the project, Phase 2 should be shown and described as part of this UDP.

As noted in your May 10, 2013 letter, it is our understanding that the DHHL will sign off on all building permits, attesting to the project's compliance with BMX-3 and BMX-4 (for the hotel) zoning district standards. This includes parking, setbacks, landscaping, and sign regulations.

Ewa Development Plan (DP)

1. Main Street/Village Center. The project should strongly consider a main street type pedestrian-friendly village or town center for its host community. The active main street could be aligned with and start at the Kapolei Parkway entry, with a secondary retail-lined street off of Kualakai Parkway. The buildings should come up to the parkways and wrap the corners to emphasize the main street gateway, rather than be set back from the streets and buffered by parking. Shops, including those in the Neighborhood Retail Center, could be located and oriented along Kapolei Parkway. These entry drives or walkable main streets could be a very welcoming project entrance for pedestrians and motorists.

2. **Parking.** The proposed expansive areas of parking along the two parkways will highly discourage nearby residents, students, and employees from walking and biking to the site. Priority should be given to storefront presence and the convenience of pedestrian access along the public streets, as opposed to parking. The majority of parking should be located behind structures or in parking garages, away from major public streets and sidewalks.
3. **Character and Scale.** There is not enough information to provide comments on the architectural character or how it is achieving a Hawaiian sense of place, as noted in the SLUC Decision and Order and the 2011 environmental assessment. While the hotel is described as 60 feet in the Building Design section, the Project Description states a possible height of 120 feet, which would not be consistent with the recommended Development Plan building height.

Circulation and Transit-Oriented Development

1. The project should include a development schedule of the various uses and building of this project in relation to the opening of proposed vehicular access locations on Kapolei Parkway, Kualakai Parkway, and Roosevelt Avenue. We want to assure that adequate egress and ingress is provided on a timely basis.
2. An interim traffic impact analysis report (TIAR) will be required in conjunction with the approval for the development of Phase 1, which will include 700,000 square feet of retail space, 50,000 square feet of office space, and 250 hotel rooms. The TIAR will need to address the adequacy of the vehicular access locations in relation to the project's development schedule for the installation of traffic signals, the need for and length of left- and right-turn lanes, and intersection design and configuration. It should be noted that permit approvals are contingent on the amount of vehicular capacity available for access into the site. If only a single point of access is available from Kapolei Parkway at Kinoiki Street, the full development of Phase 1 may not be permitted until additional points of access are provided.
3. Provisions for pedestrians and bicycles, bus, and the eventual extension of the rail transit should be accommodated. The project should be designed as a transit-ready development, and phasing should allow for the future integration of transit-oriented development. The UDP should note the general location of the future rail transit station and "touch down" structure. Also, the need to provide an enhanced pedestrian connection such as rapid flashing beacons on Kapolei Parkway at Kekahili Street should be addressed in the TIAR.
4. In addition to the State Department of Transportation (DOT) commitment to retain Kualakai Parkway to Roosevelt Avenue, confirmation from the DOT relating to the construction schedule of Kualakai Parkway makai of Kapolei Parkway should be obtained.
5. As recommended in the City's Pearl Harbor Historic Trail (PHHT) Master Plan, show the PHHT right-of-way and describe how the project intends to use and/or highlight the PHHT as an amenity.

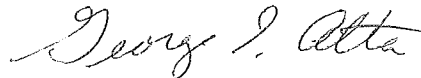
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Also, please clarify the status of these project elements, as previously proposed to the SLUC and reflected in the January 2013 Order Amending Findings of Fact, Conclusions of Law, and Decision and Order:

- The development of basement-level parking
- The provision of a bowling alley and fitness center
- A central plaza in the village square with indoor and outdoor cafes that open out to a pedestrian plaza
- Two hotels with 250 units each (as opposed to the 150-unit single hotel proposed in the UDP)

Should you have any questions, please feel free to contact Bonnie Arakawa of our Community Planning Branch at 768-8048. Questions relating to transportation should be directed to Mel Hirayama of our Traffic Review Branch at 768-8077.

Very truly yours,



George I. Atta, FAICP
Director

GIA:js
1054157

cc: State Land Use Commission