Mr. John P. Whalen, Director
Department of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

June 4, 1987
RG:0071

Dear Mr. Whalen:

Special Management Area (SMA)
Bill No. 64 (1987) to Amend SMA Ordinance
(Chapter 33, Revised Ordinances of Honolulu)
Honolulu, Oahu

The Environmental Center has conducted a review of the above mentioned
document with the assistance of Peter Flachsbart and Kem Lowry, Urban and
Regional Planning; Ray Tabata, Sea Grant; and Pamela Bahnsen and Steven
Arma.in, Environmental Center.

The referenced proposed bill would change the present Special
Management Area (SMA) from not less than 100 yards inland from the
shoreline to a minimum of 1000 feet inland. An additional distance inland
would be permitted if so designated (by the council) on the SMA maps. The
bill would also limit structure heights within this proposed SMA to 30 feet
or three stories, whichever is the lesser.

In its present form the bill does not offer any rationale for the 1000
feet figure nor does it allow for exceptions or site specific designations
of appropriate height levels which could be determined by evaluating the
existing land use and topography. Waikiki is one such area where an
exception to the 30 foot rule may be appropriate considering the present
urban build-up in the area and its economic importance. Similarly, the
height restriction may be inappropriate in areas where the topography would
shelter development from public view.

We note that the proposed SMA boundary could be further inland than
1000 feet, "if so designated on the maps." However, the appendixed map
does not include areas further inland. For example, Kawaiinui Marsh and
Diamond Head, which are presently both within the SMA boundary, are not
included in the proposed amendment. Therefore, it appears that environmentally significant coastal areas that are presently subject to SMA permit guidelines would be removed from protection.

We suggest that, along with the proposed overall height restrictions and SMA boundary change, site specific determinations and exceptions be considered. Furthermore, the rationale for establishment of these boundaries and restrictions should be clearly documented.

Thank you for the opportunity to comment on this proposed bill, we hope our comments will be helpful.

Yours truly,

[Signature]

Jacquelin N. Miller
Associate Environmental Coordinator

cc: OEQC
    L. Stephen Lau
    Peter Flachsbart
    Kem Lowry
    Ray Tabata
    Pamela Bahnsen
    Steven Armann