May 25, 1990
RG:0099

Mr. Benjamin B. Lee
Chief Planning Officer
Department of General Planning
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Mr. Lee:

Annual Amendment Review
1990 Oahu Development Plans
Primary Urban Center, Ewa, Koolauloa, Central Oahu, and Koolaupoko

The Environmental Center has conducted a review of the above referenced
documents with the assistance of Kem Lowry, Urban and Regional Planning;
Nicholas Ordway, Real Estate Research and Education; and Carolyn D. Cook,
Environmental Center. We received a total of eight documents including four
supplemental review packages. Each of these describes changes proposed for
current general land use plans in a specific area of Oahu. We offer the
following comments for your consideration.

General Concerns

Although detailed consideration of environmental impacts of specific
projects cited in the amendment review usually is reserved for other
documents (eg., EA's, etc.), our reviewers would like to have seen more
information in the amendment review in order to accurately assess the
impacts. In particular, the incremental presentation of projects provides
little, if any, consideration of cumulative effects. It would be helpful if
documents corresponding to each amendment were referenced in the Development
Plan Amendment Review. For example, in the case of Ke'ehi Lagoon, the
following documents could be listed with reference to where they may be
examined: the Final Environmental Impact Statement; Application for Zone
Change; Canoe Competition Center Environmental Assessment; the Special
Management Area Use Permit; etc.
Primary Urban Center Height Limit

Exhibit B, page B-1 in amendments for the primary urban center, describes a proposed increase of 150 feet in the height limit of a portion of the Financial District, from 350 to 500 feet total building elevation. Our reviewers consider this the most critical change proposed in the amendments, affecting proposals for development in the downtown area. Such a significant increment in height allowance raises ancillary environmental issues including possible effects on air traffic, increase in parking needs and traffic, social behavioral changes associated with increased population density, and change in general appearance (esthetics). None of these issues are developed significantly in these documents.

Ewa

Eighty four acres of AG-2 (General Agricultural) land are proposed for rezoning to Industrial in order to expand the Barbers Point Harbor to the northeast. However, developers in this area may not be able to intensify the infrastructure sufficiently to support industrial needs on this large a scale. In particular, water supply remains an uncertainty in the Ewa area. Our reviewers suggest it prudent to develop the area slowly, allowing adequate infrastructure to evolve as needed.

Thank you for the opportunity to examine and comment on this Development Plan Amendment Review for Oahu. We hope that our comments will be helpful.

Sincerely,

John T. Harrison
Environmental Coordinator

cc: OEQC
L. Stephen Lau
Kem Lowry
Nicholas Ordway
Carolyn D. Cook