DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

KIRK CALDWELL
MAYOR

WES FRYSZTACKI
DIRECTOR

JON Y. NOUCHI
DEPUTY DIRECTOR

TP5/18-728732R

June 4, 2018

Ms. Catie Cullison, AICP
Senior Associate
PBR HAWAII & Associates, Inc.
1001 Bishop Street, Suite 650
Honolulu, Hawaii 96813

Dear Ms. Cullison:

SUBJECT: Environmental Impact Statement (EIS) Preparation Notice for 820 Isenberg Street Redevelopment, Honolulu, Oahu, Hawaii

This is in response to your notice dated May 3, 2018, requesting our review and comments on the subject project. We have the following comments:

1. **Transportation Impact Assessment (TIA).**

   a. The commercial and residential development will attract more people to the site. Therefore, a multi-modal TIA should be completed to calculate and examine the vehicle, pedestrian, bicycle, and public transit stress level, comfort level, and demands on the adjacent roadways, nearby intersections, and project access driveways with corresponding improvements to mitigate these impacts by applying Complete Streets principles.

   b. Use person and vehicle trip rates from the Institute of Traffic Engineer's Trip Generation Manual and assign these trips to the transportation system. This will require analysis of crossing treatments using National Cooperative Highway Research Program 562 methodology for pedestrian measures.

   c. The calculated and observational Level of Service (LOS) should be provided.

d. Define performance measures for use in the study:

   i. V/C ratio targets that are >1 for 1st and/or 2nd highest peak hours;
   ii. Identify where vehicle LOS will not be used;
   iii. Pedestrian LOS;
   iv. Bicycle Level of Traffic Stress
   v. Transit Capacity and Quality of Service

2. **Parking and Service Strategy.**

   a. All parking needs for the proposed facility should be handled on-site.

   b. The number of parking spaces shall be justified and consistent with the trip generation method used in the TIA.

   c. The Department of Transportation Services (DTS) requires a Shared Parking Analysis, based on the Urban Land Institute Shared Parking model, and a shared parking strategy. The analysis should include a qualitative description of how the Applicant will monitor and manage opportunities for shared parking between the various users (residents, employees and visitors) of the parking structure.

   d. The Applicant shall also provide a strategy whereby a percentage of parking is separated from the lease or purchase transaction for the primary use (unbundled parking). Parking shall be rented or obtained through a separate purchase transaction when the unit is bought or rented. This increases housing affordability for households that do not use parking.

   e. The DTS recommends project designs that wrap structured parking with residential units or commercial floor area to maintain an active street frontage and pedestrian experience. Any unconcealed portions of garages should have enhanced landscape or other screening treatments.

   f. Vehicle parking ramps should be designed to accommodate demands so that vehicles will not queue onto Isenberg Street and block the roadway.

3. **Traffic Management Plan (TMP).** A TMP should be prepared for this project that is jointly reviewed and accepted by the DTS and the Department of Planning and Permitting. The TMP shall include the following:

   a. A discussion of the traffic impacts that the project may have on any surrounding City roadways and facilities, including short-term impacts during construction and long-term impacts after construction with corresponding measures to mitigate these impacts by applying Complete Streets principles.

   b. Traffic Demand Management strategies to minimize the amount of vehicular trips to the site.

   c. Construction materials and equipment should be transferred to and from the project site during off-peak traffic hours (8:30 a.m. to 3:30 p.m.) to minimize any possible disruption to traffic on the local streets.

   d. Inform residents and employees of the City's vanpool, car share and bikeshare programs to promote alternate modes of transportation. Provide reserved parking for carpool and vanpool vehicles on-site. For more information, go to www.enterpriserideshare.com, www.enterprisecarshare.com and www.bikesharehawaii.org.

   e. Consider providing subsidized transit passes to residents and employees to encourage use of public transit.

   f. Best practice TMPs provide the City with information by which to monitor construction areas. The City will require cameras where sidewalks are closed to help assess effectiveness of management.

   g. Coordinate construction schedules with other nearby properties that have planned developments to ensure minimal impacts on City streets

4. **Complete Streets.**

   a. Your project design should include compliance with the County and State Complete Streets policies, pursuant to Act 54, Session Laws

of Hawaii 2009, HRS §264-20.5 and ROH 12-15. The EIS should elaborate on how it will comply with Complete Streets policies, including specific adherence to the following key Complete Streets principles: safety, Context Sensitive Solutions, accessibility and mobility for all, use and comfort of all users, consistency of design guidelines and standards, energy efficiency, and health and green infrastructure.

b. A Complete Streets road diet is planned for Isenberg Street fronting the project area. The proposed road diet improvements should be examined, impacts resolved and incorporated into your project design. For more information on these improvements, go to www.honolulu.gov/completestreets.

5. **Bike and Moped Parking.** On-site bike racks, secure bike storage, and secure moped parking for the residents, employees and visitors should be included and located on the site plan.

6. **Driveway Design.** All access driveways to the project site should be designed with the highest pedestrian and bicycle safety measures and constructed to current City standards.

7. **Vehicle/Pedestrian Crossing.** Any existing pedestrian, bicycle and vehicle access/crossing shall be maintained with the highest safety measures during construction.

8. **Loading and Unloading.**

   a. All loading and unloading needs, including service delivery and refuse vehicles should be handled on-site, rather than on City roadways.

   b. The project should be designed to accommodate TheHandi-Van para-transit vehicles on-site, which require a minimum 31-foot turning radius, a 10-foot, 6-inch height clearance, and the ability to exit the area without reversing.

9. **Priority Guidelines on Sustainability.** In addressing priority guidelines on sustainability through HRS § 226-108, the Project should consider certification by a green building rating system, including but not limited to nationally recognized rating systems such as Leadership in Energy and

Environmental Design (LEED), the Living Building Challenge, Green Globes, or another comparable State-approved, nationally recognized, and consensus-based guideline, standard, or system.

The DTS supports certification such as the LEED for Building Design and Construction Version 4.0 as it mitigates Location and Transportation (LT) impacts including but not limited to: minimizing the environmental harms associated with parking facilities, including automobile dependence, land consumption, and rainwater runoff; reducing pollution by promoting alternatives to conventionally fueled automobiles; increasing access to quality transit; reducing Vehicle Miles Traveled (VMT) through the integration of bicycle facilities; and compact, walkable development that encourages a density and diversity of surrounding uses.

10. **Best Management Practice (BMP) Controls.** BMP controls should be included at the construction site to prevent trailing of dirt and debris on the public roadways.

11. **Roadway Damage.** Any damage to the existing roadway and sidewalk area caused by the project should be repaired to current City standards as well as meet Americans with Disabilities Act (ADA) requirements.

12. **Neighborhood Impacts.** The area Neighborhood Board, as well as the area businesses, emergency personnel (fire, ambulance and police), Oahu Transit Services, Inc. (TheBus and TheHandi-Van), etc., should be kept apprised of the details of the proposed project and the impacts that the project may have on the adjoining local street area network.

13. **Street Usage Permit.** A street usage permit from the DTS should be obtained for any construction-related work that may require the temporary closure of any traffic lane on a City street.

14. **Disability and Communication Access Board (DCAB).** Project plans (interior and exterior layouts, vehicular and pedestrian circulation, sidewalks, parking and pedestrian pathways, vehicular ingress/egress, etc.) should be reviewed and approved by DCAB to ensure full compliance with ADA requirements.

We reserve further comment pending review of the Draft EIS.

Thank you for the opportunity to review this matter. Should you have any questions, please contact Renee Yamasaki of my staff at 768-8383.

Very truly yours,

Wes Frysztacki
Director

cc: Kaleo Manuel, Department of Hawaiian Home Lands