



Coalition to Mitigate the Impacts of Sea Level Rise

[www.CMISLR.org](http://www.CMISLR.org)

Tel: (808) 200-3414

Email: [info@CMISLR.org](mailto:info@CMISLR.org)

June 2, 2023

Hawaii Community Development Authority (HCDA)  
547 Queen Street, Honolulu Hawaii 96813

**Re: Permit #: KAK 23-001; Applicant: Victoria Ward, Limited (local Howard Hughes subsidiary).**

Map Key: (1) 2-1-056: 001 Project Location: 928 Ala Moana Boulevard, Honolulu, Hawaii 96814

Description: The Applicant is proposing to build a single tower, 486-unit residential, mixed-use condominium ("Project"). The proposed Project consists of a single condominium tower located on a 65-foot-high parking podium and ground floor commercial/retail space, located on a 92,136 square foot lot on the NW corner of Ala Moana Boulevard and Ward Avenue.

Your committee is trying to make a final decision on the above-described development proposal before you without truly understanding and having the facts about the true impacts on the surrounding community and its infrastructure as a whole. However, we acknowledge the difficult position you find yourself in as during previous public hearings on similar "vested" high rise development in the area it became clear to us from what seemed to be often staged public testimony in favor that such development proposals "had to be approved" because they provided critical living wage employment in the construction industry as well millions of dollars in State and local tax revenues.

**Opposition: High-rise development proposals such as KAK-001 have large and long-lasting impacts on the community and the environment that have not been addressed. They and specifically this project therefore does not provide truly sustainable development defined as "development that meets the needs of the present without compromising the ability of Hawaii's future generations to meet their own needs."**

While the proposed project site is presently situated at the edge of the NOAA 3-foot sea level rise zone, it is actually located within the high tide zone of a former white sand beach that stretched along present Ala Moana Blvd. before the area became a capped landfill created by incinerator operations that included toxic wastes. But even within the 3-foot sea level rise zone presently relied-on flood management could become ineffective already in the near future (or extremely costly to mitigate if possible) unless the following basic, multi-flooding mechanisms are fully addressed in any such development application:

- a. rising sea levels and their cumulative effects of groundwater inundation, storm drain backflow, and "nuisance" flooding caused by occasional storm surges,
- b. the twice-a-month new and full moon tides as well as the summer and winter King tides that can turn into destructive, regular flooding events much ahead of even three-foot sea level rise.

Developers have not been required to consider the impacts of Climate Change and Sea Level Rise and possible mitigation measures and have therefore focused on very localized building adaptability and siting. With the now acknowledged unstoppable global warming expected to greatly exceed 1.5° C, sea level rise may also greatly exceed the one-foot increase predicted by NOAA for 2050. Localized or area-wide subsidence or sinking of the coastline because of the cumulative weight of the now-clustered high-rises, if anchored in less than rock-solid bedrock, could also readily exceed 2mm or 1 inch every ten years and must finally be seriously addressed.

Sincerely yours,

Klaus Radtke, Ph.D.

Environmental Scientist

Coalition Member