Royal Hawaiian Hotel & Sheraton Waikiki Master Plan Improvements

Final Environmental Assessment

Prepared For:



Prepared By:



December 2007

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Royal Hawaiian Hotel and Sheraton Waikiki **Master Plan Improvements**

Prepared for:

Kyo-ya Hotels & Resorts, LP 2255 Kalakaua Avenue, Floor 2 Honolulu, Hawaii 96815

Prepared by:Wilson Okamoto Corporation Engineers and Planners 1907 South Beretania Street, Suite 400 Honolulu, Hawaii 96826

December 2007

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APPENDIX C Archaeological Inventory Survey Plan for Improvements to the Royal Hawaiian and Sheraton Hotels, Waikiki, Kona District, Oahu, Prepared by Cultural Surveys Hawaii, May 2007

Archaeological Assessment Report for Improvements to the Royal Hawaiian and Sheraton Hotels, Waikiki, Kona District, Oahu, Prepared by Cultural Surveys Hawaii, December 2007

APPENDIX D Archaeological Monitoring Plan for Improvement to the Royal Hawaiian and Sheraton Hotels, Waikiki, Kona District, Oahu, Prepared by Cultural Surveys Hawaii, December 2007

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PREFACE

This Final Environmental Assessment (EA) / Finding of No Significant Impact (FONSI) has been prepared pursuant to Chapter 343, Hawaii Revised Statutes (HRS), and Title 11, Chapter 200, Hawaii Administrative Rules (HAR), Department of Health, State of Hawaii, as well as Chapter 25, Revised Ordinances of Honolulu. Proposed is an applicant action by Kyo-ya Hotels & Resorts, LP to renovate the existing Royal Hawaiian Hotel and Sheraton Waikiki in Waikiki, Oahu. Compliance with the provisions of Chapter 343, HRS is required because of the project's location within the "Waikiki Special District" and the related Sheraton Waikiki construction within the Shoreline Setback. The accepting agency is the City and County of Honolulu Department of Planning and Permitting (DPP), in conjunction with the processing of a Special Management Area Use Major Permit (SMP), Shoreline Setback Variance (SSV), and Waikiki Special District Minor Permit (WSD) required for the proposed action.

Since notice of the Draft EA for the proposed action was published in the Environmental Notice on August 23, 2007, the following modifications to the project description were made:

- The proposed new grease trap interceptor was installed in the basement interior adjacent to the current Sheraton Waikiki loading dock. The grease interceptor was required by the State Department of Health to meet current standards for commercial kitchen wastewater discharges into the municipal collection system.
- The proposed widening of the existing concrete seawall and walkway fronting the Sheraton Waikiki is no longer part of the Master Plan. The existing seawall and walkway were built by the private landowner; the fee owner is Kyo-ya Hotels and Resort, LP. There is a perpetual easement, or right-of way, for the general public in favor of the State of Hawaii along the top of the concrete seawall. The State of Hawaii has the duty to maintain the seawall in a safe condition for pedestrian traffic. The existing seawall and walkway will remain in place and public access will continue to be available.
- The previously proposed new Royal Hawaiian Hotel porte-cochere, to be located on the north side of the main building, is no longer part of the Master Plan. Relocation of the porte-cochere would require structural modifications to connect the new entrance with the lobby. Due to uncertainties regarding the condition of the structural components that may be affected, the relocation will not be pursued. The existing porte-cochere shall continue to serve as the driveway entry for the hotel. Minor landscaping enhancements shall be done to improve the hotel's sense of arrival. The Draft EA also noted the elimination of six guestrooms to accommodate the initially proposed Royal Hawaiian Hotel porte-cochere. Since the existing Royal Hawaiian Hotel porte-cochere will remain, the main building will continue to operate the aforementioned six rooms as saleable inventory. The Sheraton Waikiki's proposed entry will continue as part of the proposed Master Plan, which includes the removal of 32 guestrooms from the Sheraton Waikiki guestroom inventory.
- The resort pool between the Royal Hawaiian Hotel and the Sheraton Waikiki, which will replace the existing children's pool, has been redesigned as a two-tiered pool instead of the previously proposed three-tiered pool. Also, references to the resort

pool have been made consistent throughout the Final EA. In the Draft EA, the pool was alternately referred to as the "family pool" or "fantasy pool".

- No improvements in the eastern courtyard of the Royal Hawaiian Hotel, known as the "Coconut Grove", were proposed in the Draft EA. It was subsequently determined, however, that the applicant has an on-going landscape maintenance program to replace coconut palms that are damaged, deteriorating or are too tall and thin to be safely maintained. Within the Coconut Grove area, up to 14 coconut palms are planned for replacement under this routine maintenance program. Consultation with the Outdoor Circle on the landscaping maintenance program and the Master Plan related landscaping plan will continue until the completion of the project. Additional historical information on the Coconut Grove, courtesy of The Outdoor Circle, has been incorporated in Section 2.8., herein. Also, references to this eastern courtyard as the "Coconut Grove" have been made consistent throughout the Final EA. In the Draft EA, the grove was alternately referred to as the "Royal Grove". A tree-specific Tree Protection Plan for the remaining trees in the eastern courtyard, as well as a draft Landscape Maintenance Program Plan discussing management practices for protecting trees during construction of the proposed Master Plan improvements, in general, has been added to Appendix A.
- The landscape maintenance program was initially part of the on-going routine maintenance and repair undertaken by hotel operations and maintenance. Other ongoing resort activities include the routine maintenance of interior guestrooms, guest and freight elevator upgrades, the staff locker room renovation, existing retail improvements, and repainting of the Royal Hawaiian Hotel's unique pink exterior with the existing color, all of which are exempt from the EA, and the SMA and SSV permit process.

Figure 5 in the Draft EA has been modified in the Final EA to reflect the aforementioned changes. In addition, Figure 5 depicts the hardened shoreline recently certified by the State along TMK 2-6-02:06, which follows the seaward face of the existing seawall fronting the Sheraton Waikiki. At the time the Draft EA was filed, the hardened shoreline survey had not been certified.

Also, since the preparation of the Draft EA, an Archaeological Survey was conducted in accordance with an Archaeological Inventory Survey Plan that was approved by the State Historic Preservation Division (SHPD) (see Appendix C). Since no archaeological sites were found, an Archaeological Assessment Report was completed and submitted to SHPD for review and approval (see Appendix C). During the field test, two isolated bone fragments were discovered and have been reported to SHPD. An End of Fieldwork Letter dated November 19, 2007 documented the find (see Exhibit D).

Since the preparation of the Draft EA, cultural consultation and coordination has been initiated with SHPD, Oahu Island Burial Council, Native Hawaiian Organizations (including Office of Hawaiian Affairs, Hui Malama I Na Kupuna) and potential lineal and cultural descendants. The cultural consultants have been engaged in discussions with Kamehameha Schools to identify a designated re-interment site in the Coconut Grove of the Royal Hawaiian Hotel for known and potential human burial remains that may be discovered during the course of the Project. The

general location has been identified with two considerations by representatives of the OIBC, Kamehameha Schools, Kyo-ya Hotels & Resorts, LP, and Kahu Kamanu from the Kamakapilii Church. The general location highlighting these two areas is shown in Exhibit C.

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SUMMARY

Applicant: Kyo-ya Hotels & Resorts, LP

Approving Agency: City and County of Honolulu

Department of Planning and Permitting

Project Location: Waikiki, Oahu, Hawaii

Tax Map Keys and

Recorded Fee Owner: 2-6-2: 5 (10.3 Acres)

> Kyo-va Hotels & Resorts LP BP Bishop Trust Estate

2-6-2: 6 (3.5 Acres)

Kyo-ya Hotels & Resorts LP

2-6-2: 26 (0.9 Acres) Mark A. Robinson Trust

See Exhibit A, List of Persons/Entities comprising the Mark A. Robinson Trust

Area: 14.7 acres

Existing Uses: Two hotels, appurtenant resort retail and commercial uses, parking.

State Land Use

Classification: Urban

Development Plan Land Use Map

Designation: Resort

County Zoning

Designation: Resort Mixed Use Precinct

Renovation of two existing resort hotels consisting of exterior **Proposed Action:** improvements to:

- Visitor arrival and registration areas;
- On-site vehicular and pedestrian circulation; and,
- Pool, garden and recreation areas.

In addition, interior improvements, which are exempt from the EA, but, which provide the context for a comprehensive overview to identify potential cumulative impacts, are also considered. These include reconfiguration of ground level interior areas including lobby, restaurant, and retail uses in both the Royal Hawaiian Hotel and Sheraton Waikiki. Reconfiguration of the lobby level of the

S-1 Summary

Sheraton Waikiki will eliminate a total of 32 guest units in the Sheraton Waikiki. A new kitchen grease interceptor has been installed in the existing basement adjacent to the current Sheraton Waikiki loading dock.

The improvements are proposed to enhance the visitor arrival experience, including conveying a greater Hawaiian sense of place pursuant to the City's Waikiki Special District Guidelines, facilitate vehicular and pedestrian circulation and wayfinding, and provide visual linkages.

Impacts:

No significant impacts are anticipated with the construction and operation of the proposed improvements. An Archaeological Survey was conducted in accordance with an Archaeological Inventory Survey Plan approved by the State Historic Preservation Division (SHPD). Several notable cultural finds and isolated human bones were recovered and reported to SHPD and is reprinted as Exhibit D. The Archaeological Assessment Report recommends the preparation of an Archaeological Monitoring Plan (AMP) to be implemented prior to commencing construction work. A draft AMP, which will be submitted to the State Historic Preservation Division for review and approval, is reproduced in Appendix D. The proposed improvements were designed to minimize disturbance of previously undisturbed soils. SHPD, Kamehameha Schools, and the Office of Hawaiian Affairs (OHA) have been consulted, and a presentation was made before the Oahu Island Burial Council (OIBC) on June 13, 2007, the OHA Native Hawaiian Historic Preservation Council on October 22, 2007, Historic Hawaii Foundation on December 18, 2007, and again to SHPD on December 17, 2007. Consultation with potential lineal and cultural descendants, as well as interested Hawaiian organizations will also be continued throughout the project period. Such consultation is intended to determine appropriate mitigation of cultural impacts associated with any discovery of human burial remains as well as enhance the Hawaiian Sense of Place.

Exhibit C depicts the general location identified as the re-interment site for any potential human burial remains that may be discovered during the course of the project.

Determination: Finding of No Significant Impact

Parties Consulted

During Pre-Assessment: Federal Agencies

U.S. Department of the Army, Engineering Division U.S. Department of Agriculture – Natural Resources

Conservation Service

Parties Consulted During Pre-Assessment (continued):

State of Hawaii

Department of Land and Natural Resources (DLNR)

State Historic Preservation Division

Land Division

Department of Business, Economic Development and

Tourism (DBEDT)

Office of Planning

Land Use Commission

Department of Health (DOH)

Environmental Planning Office

Office of Environmental Quality Control

Environmental Management Division

Office of Hawaiian Affairs

Oahu Island Burial Council

City and County of Honolulu

Department of Planning and Permitting

Department of Transportation Services

Department of Parks and Recreation

Fire Department

Police Department

Office of Waikiki Development

Waikiki Neighborhood Board (No. 9)

Land Owners

Kamehameha Schools

Mark A. Robinson Trust

Adjacent Property Owners

Kamehameha Schools

Queen Emma Foundation

Neighboring Uses

Halekulani Hotel / Parc Hotel

Imperial Waikiki Resort

Outrigger LAX, L.P.

Royal Hawaiian Shopping Center

Organizations/Individuals and Presentation Attendees

Council Chair Barbara Marshall (3rd District)

Councilmember Charles Djou (4th District)

Councilmember Rodney Tam (6th District)

Hawaii Hotel and Lodging Association

Hawaii Visitors and Convention Bureau

Lineal and Cultural Descendents

Marsha Weinert (State Tourism Liaison)

Parties Consulted During Pre-Assessment (continued):

National Association of Industrial and Office Properties

Oahu Visitors Bureau
Oahu Island Burial Council

Outdoor Circle

Representative Tom Brower (23rd District) Senator Gordon Trimble (12th District) SMG Hawaii Convention Center

Surfrider Foundation Waikiki Beach Boys

Waikiki Beach Concessionaires

Waikiki Business Improvement District Association

Waikiki Improvement Association Waikiki Neighborhood Board

Parties Consulted During the Draft EA:

State of Hawaii

Department of Health (DOH)

Environmental Health Administration

Noise, Radiation and Indoor Air Quality Branch

Environmental Management Division

Clean Air Branch Clean Water Branch

Office of Environmental Quality Control

Department of Business, Economic Development and Tourism (DBEDT)

Office of Planning

Energy, Resources & Technology Division

Department of Hawaiian Home Lands

Department of Land and Natural Resources (DLNR)

State Historic Preservation Division

Land Division

Division of State Parks

Division of Forestry and Wildlife

Engineering Division

Department of Transportation

Office of Hawaiian Affairs

Native Hawaiian Historic Preservation Council

U.H. Environmental Center

Hawaii State Library (Waikiki-Kapahulu Branch)

City and County of Honolulu

Board of Water Supply

Customer Services Department

Department of Design and Construction

Department of Emergency Management

Department of Emergency Services

Department of Environmental Services

Parties Consulted During the Draft EA (continued):

Department of Facilities Maintenance
Department of Parks and Recreation
Department of Planning and Permitting
Land Use Permits Division
Planning Division
Site Development Division
Department of Transportation Services
Fire Department
Mayor's Office
Municipal Reference and Records Center
Office of Economic Development – Waikiki

Office of Waikiki Development

Police Department

Waikiki Neighborhood Board (No. 9)

Elected Officials

Council Chair Barbara Marshall (3rd District)
Councilmember Charles Djou (4th District)
Councilmember Rodney Tam (6th District)
Representative Thomas Brower (23rd District)
Representative Scott Nishimoto (21st District)
Senator Gordon Trimble (12th District)

Land Owners

Kamehameha Schools Mark A. Robinson Trust

Adjacent Property Owners

Kamehameha Schools Queen Emma Foundation

Neighboring Uses

Halekulani Hotel / Parc Hotel Imperial Waikiki Resort Outrigger LAX, L.P. Royal Hawaiian Shopping Center

Individuals/Organizations

Construction Industry Legislative Organization Hawaii Hotel and Lodging Association Hawaii Visitors and Convention Bureau Historic Hawaii Foundation Potential Lineal and Cultural Descendents Marsha Weinert (State Tourism Liaison) Oahu Island Burial Council Oahu Visitors Bureau Outdoor Circle

Parties Consulted During the Draft EA (continued):

Sierra Club

Surfrider Foundation

Waikiki Business Improvement District

Waikiki Hawaiian Civic Club Waikiki Improvement Association

1. SETTING AND PROJECT DESCRIPTION

1.1. Project Background and Location

Kyo-ya Hotels & Resorts, LP (Kyo-ya) is proposing to renovate the existing Royal Hawaiian Hotel and Sheraton Waikiki hotels in Waikiki. The project lies immediately makai of the Royal Hawaiian Shopping Center, which is located on the makai side of Kalakaua Avenue as shown in Figure 1. The project site encompasses approximately 14.7 acres of land area and is identified by TMK's 2-6-002: 005, 006, and 026 (see Figure 2). Surrounding uses in proximity to the project site as well as existing on-site uses are shown in Figures 3 and 4, respectively. Various photographs of existing on-site conditions are provided herein.

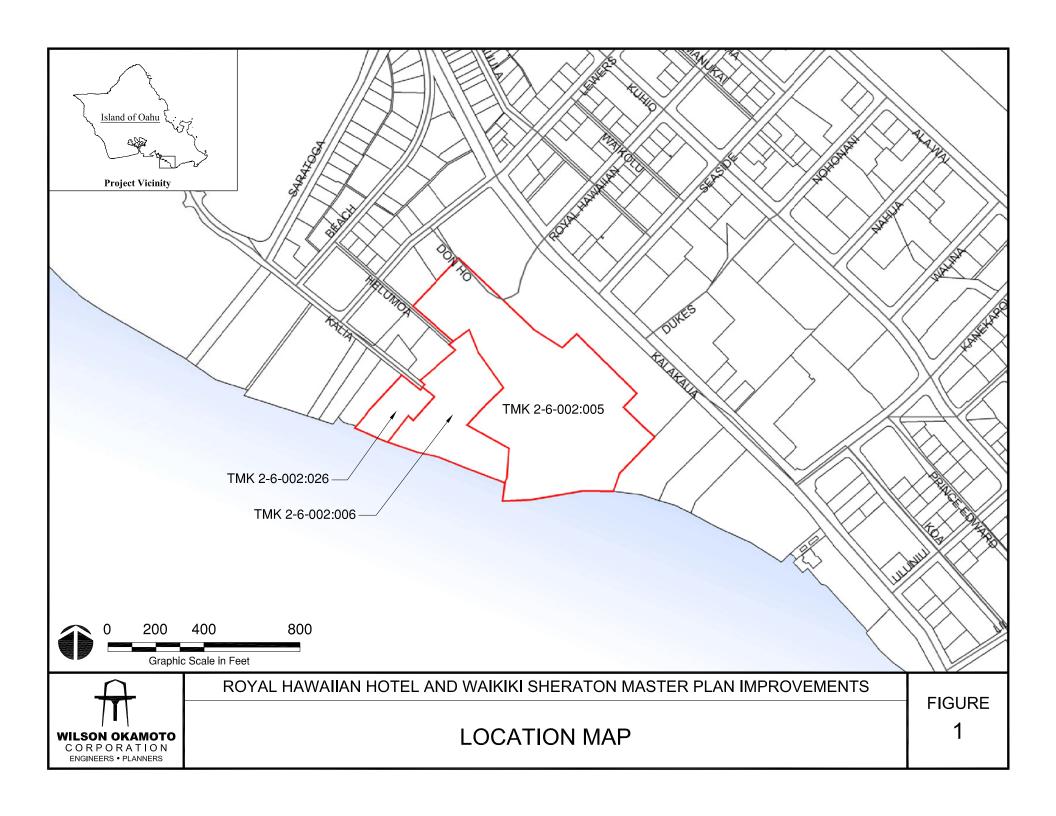
1.2. Project Description

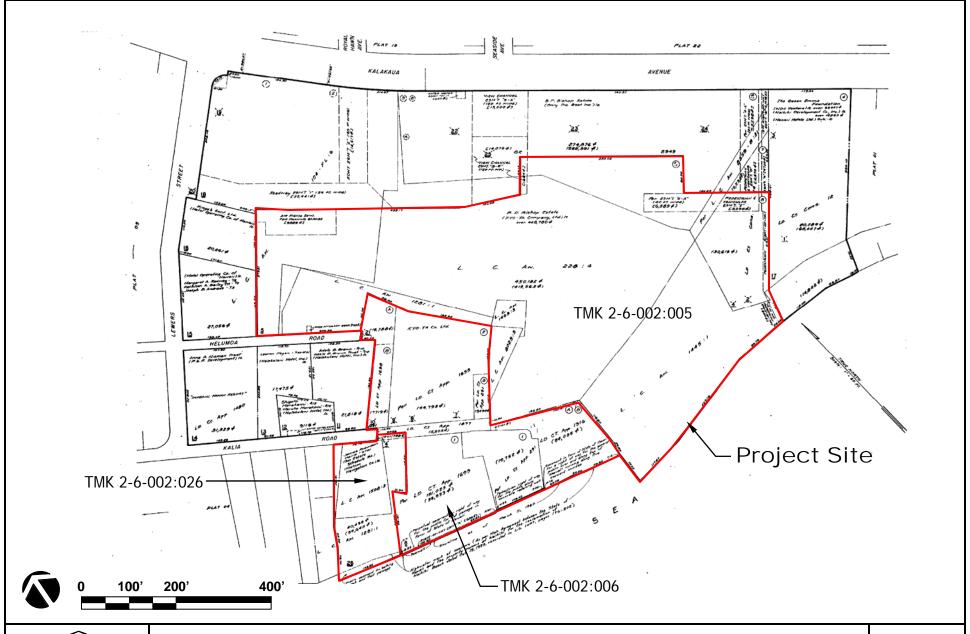
In conjunction with a master plan to comprehensively improve internal traffic circulation, upgrade hotel amenities, and enhance the overall visual character and Hawaiian Sense of Place for both, the Royal Hawaiian Hotel and the Sheraton Waikiki, Kyo-ya is proposing various improvements to both properties as illustrated in Figure 5. No net increase in floor area, density and building height or reduction in open space is proposed. 32 guestrooms in the Sheraton Waikiki will be eliminated through interior modifications, reducing the available guest room inventory to 1,642 guestrooms. The project design team sought to minimize impacts to potential archaeological and cultural features, including human burial remains, by the use of fill and constructing in areas that are known to be culturally less sensitive, such as in modern fill overlying native soils.

The following improvements are proposed to the Royal Hawaiian Hotel and Sheraton Waikiki.

A. "The Royal Grounds Arrival" Area

- For decades the Royal Hawaiian Hotel has been hidden behind the Royal Hawaiian Shopping Center. The recent improvements at the Royal Hawaiian Shopping Center provides an opportunity for Kyo-ya to create a visual corridor from Kalakaua Avenue to the majestic Royal Hawaiian Hotel by renovating the Manor Wing, which faces the circular driveway, that will serve the Sheraton Waikiki's new porte-cochere and the driveway leading to the existing Royal Hawaiian Hotel porte-cochere. These improvements are intended to enhance the Hawaiian sense of place and first impression upon arrival to the resort properties for both the Kamaaina resident and the visitor. This includes illustrating the story of Helumoa on portions of the Sheraton Waikiki porte-cochere facade.
- The front desk of the Sheraton Waikiki will be moved closer to the new porte-cochere to serve arriving guests. It will occupy the second floor of the existing Manor Wing, which will be at the same level as the new porte-cochere. Within the Manor Wing, 16 existing guestrooms on the second floor will be eliminated. The third floor of the Manor Wing along with 16 additional guestrooms will also be demolished to create a double floor ceiling space over the front desk area. A total of 32 guestrooms will be removed from the Sheraton Waikiki guestroom inventory.





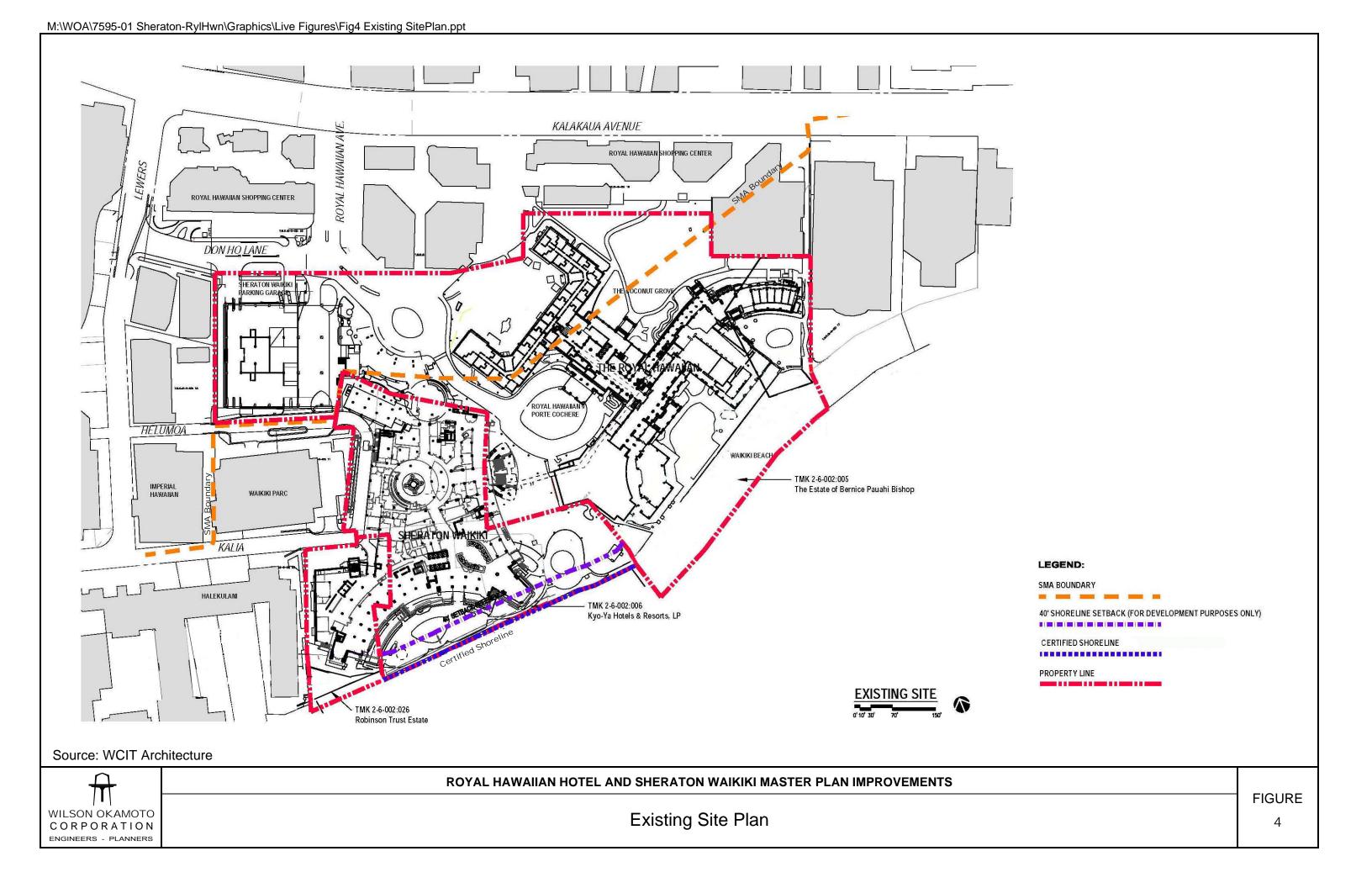


ROYAL HAWAIIAN HOTEL AND SHERATON WAIKIKI MASTER PLAN IMPROVEMENTS

TAX MAP KEY 2-6-002:005, 006, AND 026

FIGURE

2



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Existing circular driveway serving the Sheraton Waikiki portecochere and the Royal Hawaiian Hotel entrance.



The existing Royal Hawaiian Hotel driveway leading to the porte-cochere.



Existing Sheraton Waikiki beachside pool.



Existing public access walkway fronting the Sheraton Waikiki.



Existing children's pool at the Sheraton Waikiki will be replaced by the proposed Resort Pool and Deck.



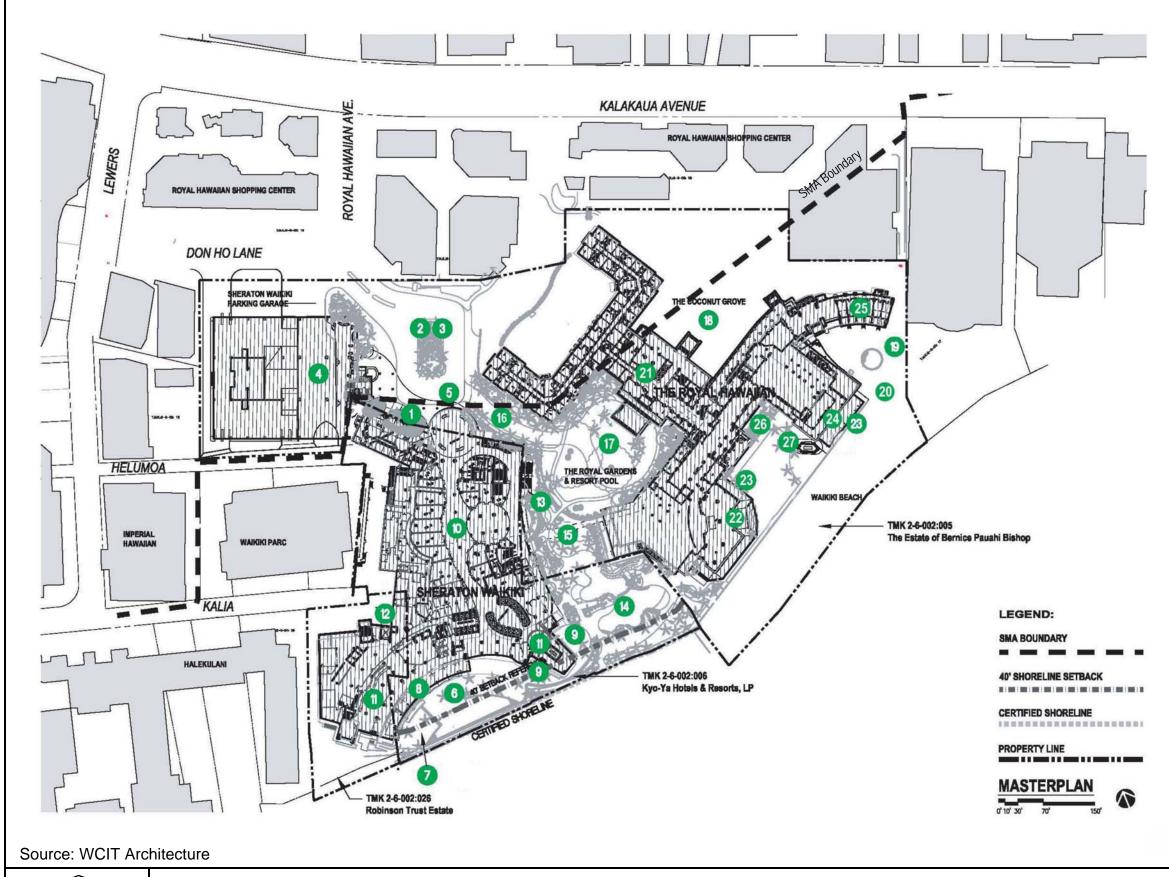
Royal Hawaiian Hotel pool to be repaired with a new elevated deck to improve safety and ADA accessibility.



The existing Royal Hawaiian Hotel driveway and porte-cochere.



Courtyard of Manor Wing to be covered by a deck to accommodate the proposed reconfigured driveway and new porte-cochere.



Sheraton Waikiki

- 1. Renovate Manor Wing facade
- 2. Improve driveway circulation
- 3. Landscape entry areas, driveway island and building edges
- 4. Enhance Bus/Group Arrival Area
- Reconstruct Sheraton Waikiki Porte-Cochere Relocate front desk closer to new Porte-Cochere
- Replace existing Sheraton Waikiki beachside swimming pool w/ new infinity edge pool. Raise deck area and add new landscaping
- 7. Renovate existing pool "Sand Bar", reconfigure landscaping
- Replace existing canvas awnings near the Sheraton Waikiki pool with a similar canvas
- 9. Raise exterior Terraces
- Renovate interior retail, public restrooms, and reconfigure the lobby and guest circulation
- 11. Renovate interior food and beverage spaces
- 12. Install new interior Grease Intercptor
- 13. Reconstruct the existing Sheraton Waikiki Grand Staircase
- 14. Replace existing Children's Pool with a new two-tierd Resort Pool
- 15. Landscape area to include a water feature and footpath

Royal Hawaiian Hotel

- 16. Reconfigure and re-landscape entry area
- Re-landscape driveway island and building edges.
 Existing significant trees to remain
- 18. Remove and replace coconut palms
- 19. Renovate and repair the swimming pool
- Construct a new raised wood deck over the existing Royal Hawaiian pool deck
- 21. Renovate and reconfigure interior ground floor
- 22. Replace existing Monarch Room glass wall
- 23. Remove and replace existing cloth awnings on the makai faces of the Monarch and Surf Rooms with awnings of similar coverage
- 24. Replace the Surf Room's existing glass sliding door system in its existing location
- 25. Interior renovations to Island Suites
- 26. Create additional open space on lanai by removing the existing Lurline Room
- 27. Repair and maintenance to the Mai Tai Bar

WILSON OKAMOTO CORPORATION ENGINEERS - PLANNERS ROYAL HAWAIIAN HOTEL AND SHERATON WAIKIKI MASTER PLAN IMPROVEMENTS

FIGURE

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- The driveways will be realigned to facilitate wayfinding, improve pedestrian and vehicular circulation and improve pedestrian safety. The circular driveway fronting the Sheraton Waikiki will be reconfigured, creating a longer drop-off/pick-up zone closer to the existing entrance of the Sheraton Waikiki and will be achieved by covering the existing ground floor courtyard of the Manor Wing. The existing tour bus (group arrival) staging area will be remarked to reverse the one-way flow, such that entry will be from Helumoa Street with an exit via Don Ho Lane to Lewers Street or Royal Hawaiian Avenue to Kalakaua Avenue. The driveway leading to the existing Royal Hawaiian Hotel porte-cochere will continue to serve as the main entry way for the guests. Overall, the pedestrian and vehicular circulation fronting the Sheraton Waikiki and the Royal Hawaiian Hotel driveway will improve.
- The entry areas, driveway islands and building edges will be re-landscaped. A water feature within the Sheraton Waikiki driveway island will enhance the Sense of Arrival.

B. The Sheraton Waikiki

- The existing beachside pool, which does not handle the current visitor/guest capacity of the Sheraton Waikiki, will be demolished and the entire deck area will be raised approximately three feet. A new, wider, but shallower (four-foot deep), infinity edge pool will be constructed as a replacement to enhance the ocean experience from the hotel and improve ADA accessibility to serve the hotel guests. The infinity edge pool will feature a seaward edge that is not bordered by the pool deck but allows water to overflow, creating a visual effect of blending with the ocean horizon. As discussed in the preface, the existing concrete public walkway along the makai edge of the pool will remain in its current condition.
- The existing pool bar will be renovated into a "Hawaiian sense of place" theme, including the bar roof. The pool deck area will also be re-landscaped.
- The existing canvas awnings located near the Sheraton Waikiki beachside pool have deteriorated and will be replaced with a similar canvas awning that will not increase floor area.
- Other hotel renovations will be confined to interior areas on the ground level, including renovating the retail and food and beverage spaces, public restrooms and reconfiguring the lobby and guest circulation. Demolition and building permits for existing and new food and beverage tenant spaces have been issued for the Sheraton Waikiki (BP 615604 and 620549). Building and demolition permit applications for the group arrival area (A2007-10-0088) and existing Ocean Terrace restaurant (A2007-10-0091) renovations have been submitted.
- A new kitchen grease interceptor has been installed in the existing basement adjacent to the current Sheraton Waikiki loading dock. The new grease interceptor was required by the State Department of Health to meet current standards for commercial kitchen wastewater discharges into the municipal wastewater collection system.

 The adjoining lawn area on either side of the existing Esprit Lounge will be elevated to provide outdoor seating with umbrellas (the Lounge itself is presently undergoing interior renovations (BP615604)).

C. The Grand Staircase and Resort Pool (between the Royal Hawaiian Hotel and the Sheraton Waikiki)

- The existing Sheraton Waikiki grand staircase will be removed and replaced with a more compact structure to allow for a new landscape area and water feature that will be constructed in this area.
- As mentioned in the Preface, the existing children's pool will be expanded to become a two-tiered "Resort Pool" including a shallow pool connected by flowing water slides.

D. The Royal Hawaiian Hotel

- The existing landscaping surrounding the Royal Hawaiian Hotel porte-cochere, building edges and driveway island will be enhanced. The driveway will be narrowed and a footpath will link the Royal Hawaiian Hotel porte-cochere with the mauka side of the Resort Pool and nearby landscape water feature. Existing large trees within the existing Royal Hawaiian Hotel entry way will be incorporated in the landscaping.
- The existing Royal Hawaiian Hotel swimming pool will be reshaped to be shallower, with a different shape of similar size, and elevated 18 inches. The deck around the existing pool is deteriorating and is difficult to maintain as it is lower than the adjoining beach, causing sand to spill onto the deck. Renovation of the existing deck by overlaying a wooden covering approximately 18 inches above the existing deck will match the floor level of the adjoining Surf Room, which will serve as preventative maintenance, improving ADA accessibility. Additional landscaping will be planted around the pool area.
- The interior ground floor of the Royal Hawaiian Hotel will be reconfigured and renovated, including the Monarch Room, Surf Room, and the elimination of the Lurline Room. The Monarch room's glass wall and the Surf Room's glass sliding door system will be replaced in their existing locations. The Lurline Room will be removed to create additional open space, restoring the initial design, while maintaining its existing column structure. Six existing ground floor rooms mauka of the swimming pool will be renovated. The existing cloth awnings on the makai faces of the Monarch Room and Surf Room have deteriorated and will be replaced with one that is the same size and in the same locations, although the type of awning will be different
- Repair, maintenance, and superficial upgrading of counters, walls, and lighting of the Mai Tai Bar will be completed.

1.3. Schedule, Phasing and Construction Costs

In general, scheduling and phasing of the various proposed improvements will be based on obtaining required permit and approvals, in particular, the Special Management Area (SMA) and Shoreline Setback Variance (SSV), both of which are related to the certified shoreline (see

Table 1). The shoreline fronting the Sheraton Waikiki (TMK 2-6-02:06) has been certified; thus defining the 40-foot shoreline area between the certified shoreline and the shoreline setback line. Structures and activities are generally prohibited within the shoreline area unless they are exempt or allowed pursuant to a SSV.

In the first phase, improvements considered interior alterations and minor exterior repair and maintenance by DPP may proceed after required building permits are obtained. Some of these interior improvements have commenced. These activities are considered exempt by DPP from EA, SMP, SSV, and Waikiki Special District (WSD) Permit requirements and are listed in the second column of Table 1, Regulatory Requirements. Work outside of the SMA may move forward after the completion of the EA process, WSD-minor permit approval, and once building and demolition permits have been approved. Improvements outside of the SMA include the proposed driveway area fronting the Sheraton Waikiki.

The final phase will include proposed improvements within the SMA and shoreline setback (see Table 1). Of the proposed improvements, those components that are subject to the SMA permit include the Sheraton Waikiki Manor Wing, Sheraton Waikiki porte-cochere and front desk, grand staircase, landscape water feature adjacent to the grand staircase, elevated exterior terraces adjacent to the existing Esprit Lounge, and the resort pool and deck, as well as the Sheraton Waikiki infinity edge pool and deck. In addition, those components, or portions thereof, which are additionally subject to the SSV, include a seaward portion of the resort pool and deck. the Sheraton Waikiki infinity edge pool and deck reconstruction, and the elevated exterior terraces adjacent to the existing Esprit Lounge. The improvements to the Royal Hawaiian Hotel pool and deck are intended as repair and maintenance of deteriorated conditions and are thus exempt from SMA and SSV approvals. The Royal Hawaiian Hotel pool deck is proposed as an ADA enhancement and preventative maintenance. As an ADA enhancement, it will directly connect with the floor level of the Surf Room without the need to use existing ramps. As preventative maintenance, it will prevent sand from encroaching onto the deck. These measures, which will enhance the safety and accessibility of this area, while improving needed repair and maintenance, are thus considered SSV exempt. An application for a SSV for the proposed improvements on the shoreline, fronting the Sheraton Waikiki and Resort Pool will be submitted to DPP for processing and approval.

It is anticipated that construction of all improvements will be completed by summer of 2009. The estimated construction cost of all phases is \$49 million.

Table 1 Regulatory Requirements															
	Item #*	Itom #*	Itom #*	Itom #*	Itom #*	Itom #*	Itom #*	Itom #*	Improvements Outside SMA and SA *	Item #	Improvements within, but Exempt from SMA ¹	Item#	Improvements within SMA but Outside the SA	Item#	Improvements within SMA and SA
		WSD-minor Permit Required	rtem #	WSD Permit Exempt ²	ItCIII #	SMA Use and WSD-minor Permit Required	Itom #	SMA Use, SSV, and WSD- minor Permit Required							
Sheraton Waikiki		Driveway Circulation	8	Canvas Awnings	1	Manor Wing	6	Infinity Edge Pool & Deck							
Wainini	3	Entrance Area - Landscape 2	10	Lobby & Guest Areas	5	Porte-Cochere Front Desk	7	Sand Bar & Landscape							
	4	Bus/Group Arrival Area 2	11	Food & Beverage Spaces	13	Grand Staircase	9	Elevate Exterior Terrace							
			12	Grease Interceptor	14	Resort Pool & Deck (por.)	14	Resort Pool Deck (por.) 3							
					15	Water Feature and landscape									
Royal			16	Landscape Entrance Area	19	Swimming Pool & Deck	20	Swimming Pool Deck (por)							
Hawaiian Hotel			17	Landscape driveway island	26	Lurline Room ¹		1 & 3							
			21	Interior Ground Floor											
			25	Island Suites											
			22	Monarch Room Glass Wall											
			23	Cloth Awnings											
			24	Surf Room Glass Doors											
			27	Mai Tai Bar											

^{*}Item # As listed in Figure 5, Proposed Master Plan

¹ According to Section 25-1.3, ROH, the following activities and uses are classified as exempt from the Special Management Area (SMA) Use Permit:

- Repair, maintenance or interior alterations to existing structures (Section 25.1.3.2(F));
- Demolition or removal of structures, except those structures located on any historic
- site as designated in national or state registers (Section 25-1.3.2(G)); or,
- Nonstructural improvements to existing commercial structures (Section 25-1.3.2(O)).
- ² According to Table 21-9.6(C), LUO, the following activities and uses are classified as exempt from the Waikiki Special District (WSD) permit:
 - Minor exterior repair, alteration or addition to nonhistoric structures, which does not adversely change the character or appearance of the structure;
 - Interior repairs, alterations and renovations to all structures;
 - Demolition of nonhistoric structures (minor permit required when structure is over 50 years old); or,
- ³ According to Section 23-1.5(b), ROH, the following activities and uses are classified as exempt from the Shoreline Area:
 - Minor structures and activities permitted under rules adopted by the department which do not affect beach processes or artificially fix the shoreline and do not interfere with public access, public views or open space along the shoreline.

^{*} SA Shoreline Area (land area between the shoreline and the shoreline setback line)

2. DESCRIPTION OF THE EXISTING ENVIRONMENT, PROJECT IMPACTS AND MITIGATION MEASURES

The following is a description of the existing environment, assessment of potential project impacts and proposed mitigation measures.

2.1. Climate

The climate of the Honolulu area is typical of the leeward coastal lowlands of Oahu. The area is characterized by abundant sunshine, persistent tradewinds, relatively constant temperatures, moderate humidity, and infrequent severe storms.

Northeasterly tradewinds prevail throughout the year although their frequency varies from more than 50 percent during the summer months to 90 percent in January. The average annual wind velocity is approximately 10 miles per hour.

The mean temperature measured at Honolulu International Airport ranges from 70 degrees Fahrenheit (°F) in the winter to 84°F in the summer. The temperatures in the Waikiki project area may be slightly higher due to localized urban heating effects. The average annual precipitation in the vicinity of the project site is approximately 24 inches, with most of the rainfall occurring between November and April. Relative humidity ranges between 56 and 72 percent.

Impacts and Mitigation Measures

The proposed project will not affect regional climate conditions.

2.2. Topography and Soils

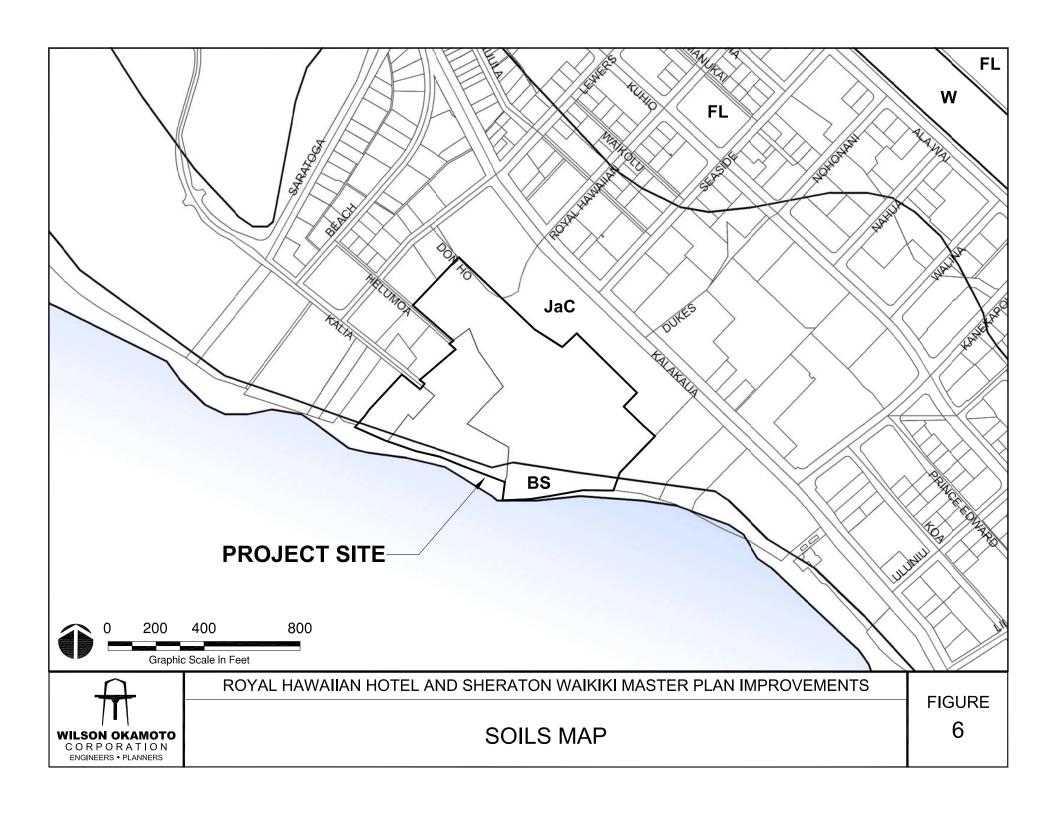
Topography: The project site fronts the shoreline and is relatively flat with elevations ranging from zero to approximately eleven feet above mean sea level (msl).

Soils: According to the U.S. Department of Agriculture Soil Conservation Service, the majority of soils underlying the project site are classified as Jaucas sand (JaC) (See Figure 6). A representative profile of this soil type is single grain, pale brown to very pale brown, sandy, and more than 60 inches deep. The slope range of this soil is 0 to 15 percent, but in most places the slope does not exceed 7 percent. Permeability is rapid, runoff is slow to very slow, and the hazard of water erosion is slight. Large portions of the project, including much of the built-over and landscaped areas are likely composed of imported soils.

The shoreline reaches of the project site are classified as Beaches (BS), which consist of highly permeable sandy, gravelly, or cobbly areas. A representative profile of this soil type consists mainly of light-colored sands derived from coral and seashells or dark colorations derived from basalt and andesite. BS soils have no value for farming. Where accessible and free of cobblestones and stones, they are highly suitable for recreational uses and resort development.

Impacts and Mitigation Measures

While great effort was taken to minimize ground disturbance, various components of the proposed project will involve excavating, filling, and grading portions of the project site. These activities will not significantly alter the topography of the project site with the exception of: (1) Raising a portion of the driveway area fronting the Sheraton Waikiki and covering the courtyard fronting the Manor Wing; and (2) Raising the Sheraton Waikiki



beachside pool and pool deck area. These areas will not generally require excavation to deeper levels and, instead, will be filled to accommodate the higher elevations of the new hotel features. Proposed excavation elsewhere on-site will be limited to the superficial removal and replacement of existing pavement, sidewalks, landscaping and utility lines. Excavation during the Archaeological Inventory Survey fieldwork, completed intermittently from October 1, 2007 to October 16, 2007 tested soil as deep as seven and a half feet (see Exhibit C). An initial twelve successful post-hole excavations were completed near the traffic island fronting the Sheraton Waikiki, along the eastern (Diamond Head) side of the Sheraton Waikiki adjacent to the existing grand staircase, and surrounding the Resort Pool. The makai portion of the Resort Pool was the only post-hole testing area to contain natural jaucus sand sediments at a depth which could be impacted by the proposed improvements. As a result, two, two meter by two meter, test units were excavated on the makai end of the Resort pool area. The first test unit contained disturbed sand sediment including cobbles, boulders, and cultural material. The second test unit contained very little cultural material in Stratum II, disturbed sand. Once Stratum III, jaucas sand sediments, were observed, the base of excavation was leveled and new artifact bags were assigned. Features found were defined as trash pits, possible post-molds, or indefinable.

The area of soil disturbance within the project site will be greater than one-acre, thus, a National Pollutant Discharge Elimination System (NPDES) Notice of Intent (NOI) for Discharges Associated with Construction Storm Water Activities will be required from the State of Hawaii Department of Health (DOH). Storm runoff from the project site during site preparation will be controlled in compliance with the City and County of Honolulu's "Rules Relating to Storm Drainage Standards". Typical mitigation measures will include appropriately stockpiling materials on-site to prevent runoff and establishing landscaping as early as possible on completed areas. These measures, in combination with those required pursuant to the NPDES NOI will mitigate the potential for siltation and erosion.

2.3. Hydrology

Oahu's south central coast, geographically referred to as the Honolulu Plain, is underlain by a broad elevated coral reef that has been partly covered by alluvium carried down from the mountains. Lava flows of the Honolulu Volcanic Series are interbedded with these reef deposits which were formed when the sea level was higher than it is now. The same interbedding of coral and alluvial deposits that play an important role in Oahu's geology also influenced the hydrological character of Oahu's leeward coastline. The interface between upper sedimentary layers and the underlying basalt constitutes a zone of low permeability known as caprock. This caprock extends along the coastline at about 800 to 900 feet below sea level, forming an impervious zone that impedes the seaward movement of potable water from the basaltic aquifers.

There is no natural surface water within the project site. The nearest surface water body is the shoreline south (makai) of the project site, which is designated as Class A waters.

According to the State Commission on Water Resource Management there are no registered potable water wells in the Waikiki area.

The City and County of Honolulu Board of Water Supply Pass/No Pass line delineates the boundary of the potable water aquifer. The project site falls within areas makai of the line, which suggests that activities on the project site will not impact potable groundwater resources.

Impacts and Mitigation Measures

In the short-term, construction of the water features fronting and along the eastern (Diamond Head) side of the Sheraton Waikiki, and the Resort Pool located between the Royal Hawaiian and Sheraton Waikiki hotels will require excavating up to four feet below existing ground level. A portion of the new pool will be at the location of the existing children's pool.

Because the water table may be encountered at shallow depths below existing grade, temporary dewatering may be required. If discharges are anticipated as a result of dewatering activities, a NPDES NOI for Discharges Associated with Construction Activity Dewatering will be obtained from the DOH. Additionally, disposal of the dewatering effluent into the municipal storm drain system will require a permit from the City and County of Honolulu Department of Planning and Permitting.

Soil runoff from minor excavations will be controlled in compliance with City and County of Honolulu grading permit requirements. Typical mitigation measures include removing excess excavated materials, appropriately stockpiling materials to be used for backfill and constructing over exposed soils as early as possible.

2.4. Flood Hazard

According to the Flood Insurance Rate Map (FIRM), Number I 5003C0370F effective September 30, 2004, prepared by the Federal Emergency Management Agency (FEMA), the project site lies within three flood hazard designations (see Figure 7). Approximately half of the project site is designated Zone AO, Special Flood Hazard Areas Inundated by 100-year Flood, with an average flood depth determined at one to three feet. The mauka portions of the project site are located within this designation. A portion of the Royal Hawaiian Hotel and its existing porte-cochere are located within Zone A Special Flood Hazard Areas Inundated by 100-year Flood, with no base flood elevation determined. The southern (makai) band of the project site is designated Zone AE, Special Flood Hazard Areas Inundated by 100-year Flood, with a base flood elevation determined from six to seven feet.

Impacts and Mitigation Measures

The makai side of the Sheraton Waikiki will be elevated to accommodate the proposed raised deck at the Sheraton Waikiki swimming pool and dining terraces adjacent to the existing Esprit Lounge. No lowering of interior floor elevation is proposed. All renovations will comply with City flood ordinances. The proposed improvements shall be in compliance with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR).

2.5. Flora and Fauna

A Tree Survey was conducted by a certified arborist (Steve Nimz and Associates, LLC) in February 2007 to inventory the major trees and plants on the project site, determine their size and condition, and recommend their disposition within the proposed project. Approximately 730

plants were inventoried, comprising numerous species of introduced, native Hawaiian, and Polynesian-introduced trees, palms, shrubs, and groundcovers. Although there are some notable trees, none are recognized as "exceptional trees" by the City and County of Honolulu. No threatened or endangered plant species are known to exist on the subject property. Table 2 summarizes the survey findings, while the survey in its entirety, related maps, and a draft Tree Protection/Preservation Plan describing the best practices for protecting trees during construction are included in Appendix A.

Faunal species may include rats and mice that are common to urban environments. Avifaunal species identified at the project site include those common to urban areas such as the barred dove, mynah, sparrow, Brazilian cardinal, and finches. No federally protected, threatened or endangered species of animals are known to inhabit the project area.

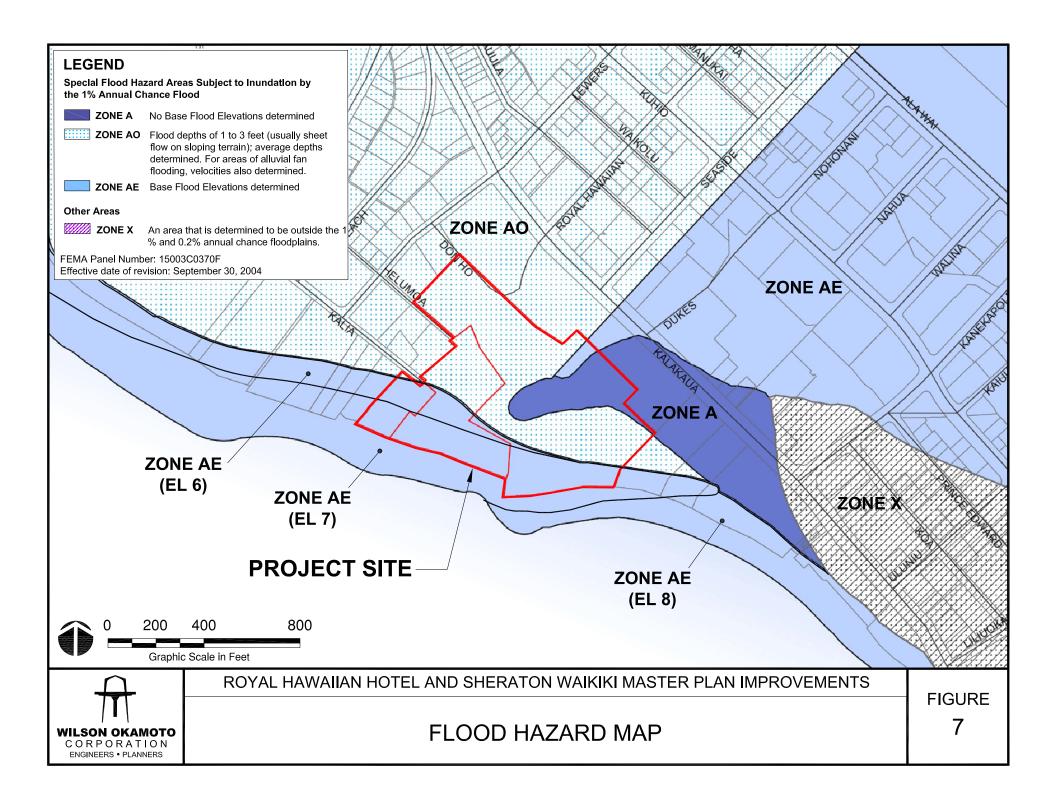
Impacts and Mitigation Measures

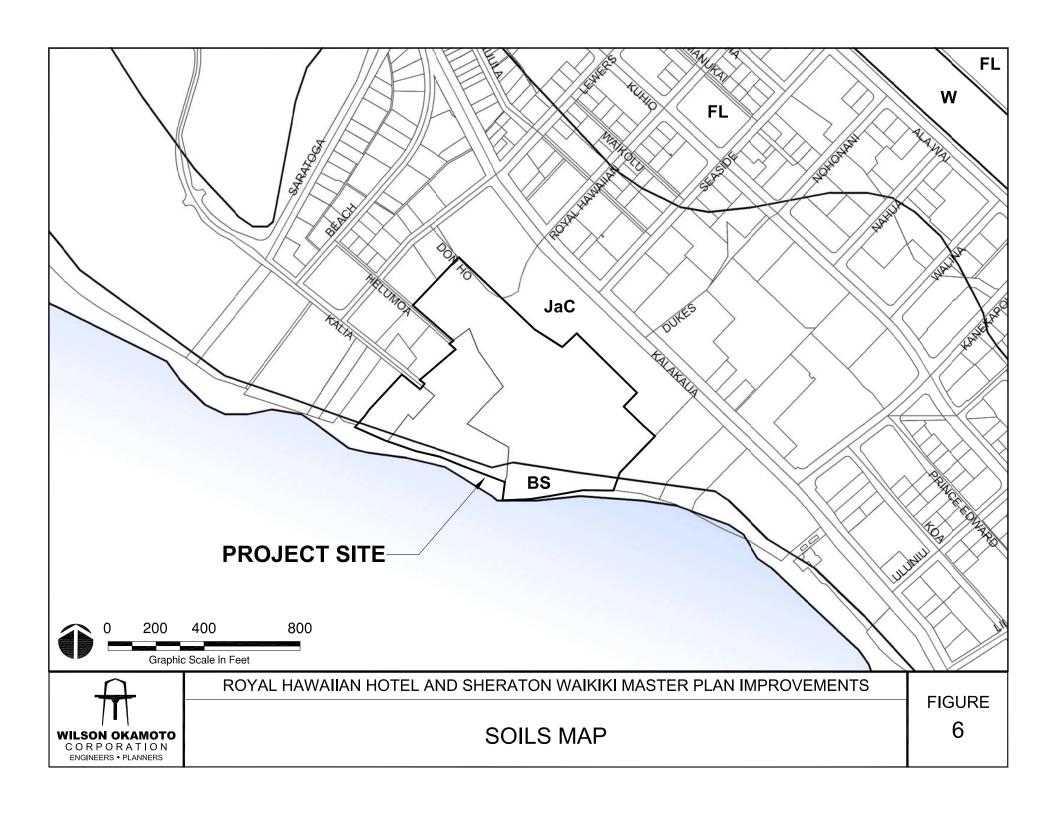
A landscape design plan will be prepared to support applications for a SMP and WSD Minor Permit. The concept for the landscape design plan is to enhance the Hawaiian sense of place through the use of native Hawaiian plants, Polynesian-introduced, and exotic plants that have come to represent Hawaii.

Mature trees and palms will be retained or relocated within the project site when feasible. Notably, the existing Monkeypod Trees and Indian Banyans at the Royal Hawaiian Hotel porte-cochere will be protected in place, and will be featured in the landscape design enhancement. A certified arborist will be retained to assist in the relocation of mature trees and the pruning of existing trees determined to remain on-site. Where necessary, Coconut Palms with brown trunk heights less than 40 feet will be relocated. It is anticipated that Coconut Palms showing stress, such as trunk damage, poor bases, thin trunks, trunk narrowing, and penciling will be removed. The remaining landscaping will be removed during construction and replaced with new landscaped areas.

Within the project site, site preparation will remove existing plant species that provide a small habitat for various bird, mammal and insect species that commonly occur in subtropical urban environments. When landscaping for the proposed project is established, however, many of these displaced species are anticipated to return.

No adverse impacts on fauna are anticipated. As discussed in the Preface, the Master Plan does not propose improvements within the grove of coconut palms located in the eastern courtyard of the Royal Hawaiian Hotel as shown in Figures 4 and 5. A previously initiated landscape maintenance program for the Coconut Grove has been ongoing in recent years and includes the removal and replacement of coconut trees that are damaged, deteriorating or too tall and thin to be safely maintained. The most recent evaluation identified 14 palms for replacement. Since the eastern courtyard will be used as a storage area for furnishings and some construction material to be used during the construction phase of the proposed improvements at the Royal Hawaiian Hotel, the palms to be replaced will be removed prior to construction and replaced following construction when the landscaping is restored. A tree-specific Tree Protection Plan for the remaining trees in the eastern courtyard, as well as a draft Landscape Maintenance





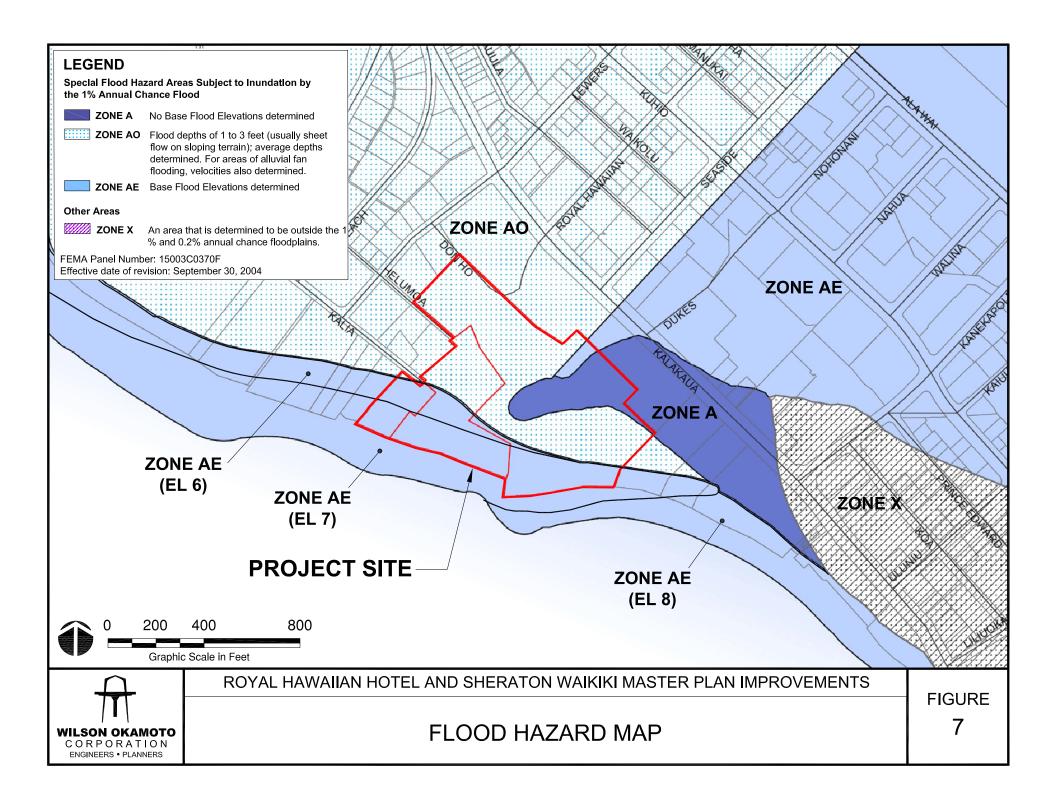


Table 2 Summary of Tree Survey						
1.	African Tulip (Spathodea campanulata)	26. Hong Kong Orchid (<i>Bauhinia x blakeana</i>)				
2.	Areca Palm (<i>Dypsis lutescens</i>)	27. Indian Banyan (Ficus benghalensis)				
3.	Australian Tree Fern (Cyathea cooperi)	28. Kentia Palm (<i>Howea species</i>)				
4.	Autograph (Clusia rosea)	29. King Palm (Archontophoenix alexandrae)				
5.	Banana (<i>Musa species</i>) (P*)	30. Kukui (<i>Aleurites moluccana</i>) (P)				
6.	Caribbee Royal Palm (Roystonea oleracea)	31. Lechoso (Stemadenia litoralis)				
7.	Chinese Banyan (Ficus microcarpa)	32. MacArthur Palm (<i>Ptychosperma macarthurii</i>)				
8.	Chinese Fan Palm (<i>Livistona chinensis</i>)	33. Manila Palm (Veitchia merrillii)				
9.	Chinese Lantern (Abutilon x hybridum)	34. Monkeypod (Samanea saman)				
10.	Citrus (Citrus sp.)	35. Montgomery Palm (Veitchia montgomeryana)				
11.	Coconut Palm (Cocos nucifera) (P)	36. Mountain Apple (<i>Syzygium malaccense</i>) (P)				
12.	Common Coral (Erythrina crista-galli)	37. Plumeria (common) (<i>Plumeria x rubra</i>)				
13.	Croton (Codiaeum variegatum)	38. Podocarpus (Common) (<i>Podocarpus) macrophyllu</i> s				
14.	Cuban Royal Palm (Roystonea regia)	39. Pride-of-Barbados (<i>Caesalpinia</i>)pulcherrima				
15.	Date Palm (male) (Phoenix dactylifera)	40. Queen Palm (Syagrus romanzoffianum)				
16.	Dracaena Fig (Ficus microcarpa)	41. Rainbow Shower (Cassia javanica x fistula)				
17.	Dwarf Date Palm (<i>Phoenix roebelenii</i>)	42. Royal Poincianna (<i>Delonix regia</i>)				
18.	False Olive (<i>Elaeodendron orientale</i>)	43. Satinleaf (<i>Chrysophyllum oliviforme</i>)				
19.	Fan Palm (Coccothrinax)	44. Schefflera (Schefflera actinophylla)				
20.	Fan Palm (<i>Prichardia species</i>) (E*)	45. Seagrape (Coccoloba uvifera)				
21.	Giant White Bird of Paradise (Strelitzia nicolai)	46. Singapore Plumeria (<i>Plumeria obtuse</i>)				
22.	Great Crepe Myrtle (Lagerstroemia speciosa)	47. Soapberry (Not Available) (E)				
23.	Hala (Pandanus tectorius) (I)	48. Tahitian Gardenia (<i>Gardenia taitensis</i>)				
24.	Hau (<i>Hibiscus tiliaceus</i>) (P)	49. Traveler's Palm (Ravenala madagascariensis)				
25.	Hawaiian Tree Fern (Cibotium glaucum) (E)	50. Variegated Rubber Tree (Ficus elastica, var.)				
* Depends on species (I) Indigenous (E) Endemic (P) Polynesian Introduced						
Source: Steve Nimz and Associates, LLC. February 18, 2007						

Program Plan discussing management practices for protecting trees during construction of the proposed Master Plan improvements, in general, has been added to Appendix A.

2.6. Noise

Ambient noise levels along Kalakaua Avenue in the vicinity of the project site are relatively high because it is at the heart of urban resort activity in Waikiki. In addition, noise from busy commercial establishments offering dining, entertainment, and shopping opportunities are also part of Waikiki's urban resort ambiance. Mostly during the day, noisier vehicles such as delivery trucks, tour buses, and refuse haulers converge to service the high-density resort core, as do responding emergency vehicles with sirens, at all hours of the day and night. Building equipment such as air conditioners, commercial kitchen and parking structure exhaust systems, and elevators are stationary noise sources, while portable blowers, mowers, trimmers and other power tools are used for property maintenance. Construction noise is also common in Waikiki as economic opportunities fuel investment in public infrastructure and amenities, as well as private improvements and redevelopment.

Impacts and Mitigation Measures

During the construction phase of the proposed project, typical construction noises will be audible in the area. However, noise from construction activities must comply with DOH noise regulations (Chapter 11-46 Community Noise Control, Hawaii Administrative Rules) as specified for construction-related activities.

If the proposed construction activity occurs while other nearby construction projects are also on-going, there may be a cumulative effect on the character of ambient noise. People in the vicinity may have a heightened awareness of construction activities occurring in the area. Some people could perceive this as a greater nuisance, even though noise generated at each construction site may be within limits of compliance.

Traffic associated with the proposed project is not anticipated to increase since no net increase in traffic will be attributable to the proposed improvements. The proposed improvements will not increase net floor area or parking capacity. The proposed elimination of 32 guestrooms within the project site will marginally reduce traffic attributed to those rooms.

2.7. Air Quality

Air quality in the vicinity of the project site is primarily affected by vehicular emissions generated along surrounding streets. Among the various air pollutants for which State and National standards have been established, carbon monoxide level is the primary concern in areas near heavy traffic flow. The federal standard for carbon monoxide is a maximum of 40 micrograms per cubic meter (μ g/m³) for 1-hour samples and 10 μ g/m³ for 8-hour samples. State of Hawaii regulations, which are more stringent, limit carbon monoxide to 10 μ g/m³ for 1-hour samples and 5 μ g/m³ for 8-hour samples. According to the DOH Clean Air Branch, the Waikiki Air Monitoring Station on Kalakaua Avenue reported that carbon monoxide levels have not exceeded State or Federal standards in the past several years.

Impacts and Mitigation Measures

The proposed project will have short-term construction-related impacts on air quality, including the generation of dust and the emissions from construction vehicles and equipment and from the vehicles of commuting construction workers. The construction contractor is responsible for complying with State Department of Health, Administrative Rules, Section 11-60-11.1 regarding air pollution control, specifically Section 11-60.1-33, regarding fugitive dust and the prohibition of visible dust emissions at property boundaries.

Mitigation measures to address short-term impacts to air quality include:

- Minimizing the movement of construction vehicles during peak traffic periods and.
- Controlling the generation of fugitive dust through frequent watering of exposed areas and constructing or planting landscaping over exposed soils as soon as possible.

In the long-term, it is not anticipated that traffic associated with the proposed project will adversely affect air quality since there is no anticipated increase in traffic attributable to the project in the vicinity of the project site.

2.8. Archaeological, Historic, and Cultural Resources

2.8.1. Archaeological Resources

According to the Archaeological Literature Review and Field Check for improvements to the Royal Hawaiian and Sheraton Hotel (Appendix B), the historic records indicate that the entire project area is culturally, historically and archaeologically significant. The following summarizes historic and cultural information regarding possible cultural resources, including human burial remains that may be associated with the project site (Diacritical markings for Hawaiian terms and names are used in this section. References to citations, on-site locations and appendices refer to those contained in the Archaeological Literature Review and field check (Appendix B)):

- The common place name for this area "Helumoa" is translated as "chicken scratch" with the provided explanation that "Chickens scratched to find maggots in the victim's body" in reference to the remains of human sacrifices at the Helumoa Heiau (Pukui et al. 1974:44). There are no known maps showing the precise location of Helumoa Heiau. Thomas Thrum (1906:44) relates that it was a "place of sacrifice" going back at least as far as A.D. 1610. Later Thomas Thrum (1927:34) would note: "This temple was long ago demolished, not a stone being left to mark the site, which was doubtlessly near, if not the [italics in original] actual spot now graced by the new Royal Hawaiian Hotel". The historic information would suggest that the Helumoa Heiau may be located between the Southwest Royal Hawaiian Hotel and the South Sheraton proposed areas of work.
- Assertions that the royal residence of the ruling chiefs Kahekili and Kahahana, before him, and perhaps previous O'ahu ruling chiefs were located between the Royal Hawaiian Shopping Center and the Royal Hawaiian Hotel (¹Ī¹ 1959:17; Kanahele 1995:134).
- Fornander's account of "The Story of Kahahana" provides the detail that (circa 1785) the
 massive invasion force of the Maui chief Kahekili was encamped at 'Āpuakēhau, where
 they were organizing and preparing to march inland. It was there at 'Āpuakēhau that the

- O'ahu forces first attacked "the Maui troops collected at the *heiau*". There "a fight commenced to which Hawaiian legends record no parallel". (Fornander 1919 Volume VI, part 2; page 289).
- 'Î'T provides more specific data in his supportive testimony for LCA 228 awarded to Kaleiheana in 1847 declaring that "Kamehameha himself lived on this land". [between the Royal Hawaiian Shopping Center and the Royal Hawaiian Hotel] (Appendix A-2).
- 'Î'T comments in supportive testimony for LCA 228 awarded to Kaleiheana in 1847 that relatively high status attendants of Kamehameha I ("Their work was taking care of the house and preparing the food. These people were in constant contact with the chiefs and were close to each and every chief") continued to live on the property when Kamehameha I died. ('Î'T, Appendix A-2)
- Kanahele (1995:99) writes of an "'ulu maika course that was part of the royal sports complex of Kahuamokomoko in Helumoa" and states that: "When excavations for the Royal Hawaiian Hotel were made in the early 1920s many 'ulu maika discs were found", indicating the prospect for further finds in the general vicinity.
- Land Commission Awards indicate a pattern of relatively dense and high status habitation within the project area.
- Waikiki in general once had groves of coconut trees, known as "Helumoa Grove", that is well known and well documented starting with Vancouver's expeditions of the 1790s (Menzies 1920:23-24). Thrum's Hawaiian Annual for 1928 states, "[The then new Royal Hawaiian Hotel] is located in the famous grove of coconut palms, of some ten acres in extent, between Kalakaua Avenue and the beach, that once was the attraction and abiding place of Oahu and Maui kings, long before Kamehameha and his army of invasion landed in its vicinity and dispossessed Kalanikupule..." (Thrum 1927:33).
- The "Helumoa Grove" was associated geographically with a residence of royalty of long standing and undoubtedly was an amenity attractive to the residence there by ruling chiefs. The discourse about a "special" coconut grove is, however, somewhat reminiscent of that about a "sacred grove" of coconut trees at coastal Wailua Kaua'i which in point of fact was created as a circa 1900 copra plantation.
- While efforts to date by Cultural Surveys Hawaii are by no means exhaustive, data certainly indicates that there is little documentation of the history and significance of the "Helumoa Grove". To complicate matters, many photographs of the vicinity from the late 1800s and early 1900s (see Appendix B, Figure 6) show many coconut trees extending to the east of Helumoa along the coast toward Diamond Head for seemingly a kilometer or more in an unbroken belt.
- Mary Steiner of the Outdoor Circle kindly provided an article printed by Paradise of Pacific in February 1926, "Helumoa, The Phantom Rooster of Waikiki". Mrs. Ninia Kanae, whose family lived on Kalia Road for six generations, explains how Helumoa came to be. "At that time there was one tree, taller than the rest...whose fruit was tabu to the common people. According to legend, a phantom rooster dwelt in the Koolau Mountains somewhere in the vicinity of Palolo valley and the seven craters...One day when Kakuhiewa, then king of Oahu, was playing at games in these grounds, the phantom rooster suddenly alighted in front of him and began scratching in the dust at his feet. The bird remained but a moment, then disappeared as suddenly as he had come. Kakuhiewa called to his men and ordered them to plant a coconut in the very spot where the rooster had scratched. This they did, and from it grew the great coconut tree which was itself known as 'helumoa' because of the fact the rooster had scratched at the place from which it grew. It was supposed to be the parent of all the other trees of the grove

and was for years higher than any of them". Ms. Kanae further explains, "the tabut on it was strictly enforced and none of the common people would have dared touch one of the nuts from it, although they were at liberty to take nuts which fell from other trees in the grove. It blew over only a few winters ago during a heavy wind storm and with its fall the old Hawaiians felt almost as if another 'alii' had gone".

- Reference in the October 1923 records of the Bernice Pauahi Bishop Museum that "...five individuals from Helumoa, Waikīkī, O'ahu were collected by Kenneth P. Emory. Museum information indicates they were victims of the 1853 smallpox epidemic..." (Federal Register January 28, 1998 Volume 63, Number 18). Given that the Royal Hawaiian was not opened until February 1, 1927, it is not clear that these remains were from construction of the Royal Hawaiian. Regardless the Helumoa remains could not have been recovered from very far away. The rationales for Emory's association of the remains with the smallpox epidemic are not known at this time. Because of the nature of the disease, small pox burial grounds could include many sets of remains indicating the prospect for further finds in the general vicinity.
- Reference in the 1970 records of the Bernice Pauahi Bishop Museum that: "...eight individuals from Waikīkī...[donated] by the Sheraton Hawai'i Corp...recovered during excavations for tank construction...". This would appear to relate to the original work at the Sheraton Waikiki that was completed in 1971.
- The understanding that several sets of remains were discovered during the prior redevelopment of the Royal Hawaiian Shopping Center (perhaps c. 1979) (personal communication from Ms. Lurline Salvadore formerly of the Kamehameha Schools' staff).
- The apparent discovery of human remains circa 1993 (personal communication from Mr. David Lee) during work on a sewer line in the basement of the accounting department of the Sheraton Waikiki just northwest of the South Sheraton area of proposed work indicating a heightened possibility of finds in this area. It is believed these remains were relocated to the Southwest Royal Hawaiian re-interment location outside the area of proposed work.
- This discovery of human remains still remains in the North Royal Hawaiian Hotel proposed area of work (SIHP # 50-80-14-5937) identified in April 2001 during excavations associated with the construction of the Abhasa Spa at the Royal Hawaiian Hotel (Elmore et al. 2001). The Elmore et al. (2001:9) study relates an anecdotal account of additional remains "in a nearby location".
- The substantial history of archaeological work in Waikīkī has indicated a relatively high density of burials within beach sand and Jaucas sand deposits such as the soils found within the entire project area. Much of Waikīkī was formerly quite low-lying, at or close to the water table. Lands that were slightly higher, such as the present project area were preferentially chosen for interment of the dead.

Impacts and Mitigation Measures

Consistent with the documented history and cultural significance of the area there will be extremely close and on-ongoing coordination with the State Historic Preservation Division (SHPD), Oahu Island Burial Council (OIBC), Office of Hawaiian Affair (OHA), and other concerned parties (especially those individuals and families who have been recognized by SHPD as being cultural or lineal descendants of the area).

The following summarizes potential impacts and mitigation measures addressing archeological and cultural resources:

- An Archaeological Inventory Survey report as been submitted to SHPD for approval (see Appendix C). On-going coordination will be maintained with SHPD, OIBC, OHA, and other interested parties regarding the archaeological inventory survey prior to construction and on-site archaeological monitoring will be provided during construction activities.
- SHPD will determine appropriate mitigation of impacts on historic properties based on perceptions of the nature, location and extent of project-related impacts into relatively undisturbed strata that may hold intact cultural resources. Clearly, large portions of the proposed areas of potential ground disturbance have very thick fill layers that effectively protect any underlying historic properties from shallow intrusions.
- It is understood that a pedestrian tunnel connecting the Sheraton Waikiki and Royal Hawaiian Hotel (running roughly NW/SE across the southwest side of the Royal Hawaiian Hotel adjacent to the grand staircase) was effectively constructed on grade and then backfilled over with the backfill close to 8-feet (2.47 m) thick. The observed height of the makai side of the Sheraton Waikiki, above the beach, is also commensurate with the understanding that the existing Sheraton Waikiki beachside pool is constructed within a thick fill deposit.
- Documentation of the thickness of fill deposits may go far in addressing SHPD's concerns for the possible impacts on historic properties. This would appear to be possible through examination of the results of planned geotechnical testing. The geotechnical monitoring plan has been submitted to SHPD for approval because of the potential cultural deposits that may be encountered.
- Excavation during the Archaeological Survey fieldwork, completed intermittingly from October 1st through 16th, 2007, tested soil as deep as seven and a half feet. An initial twelve successful post-hole excavations were completed near the traffic island fronting the Sheraton Waikiki, along the eastern (Diamond Head) side of the Sheraton Waikiki, adjacent to the existing grand staircase, and the area surrounding the Resort Pool. The area surrounding the Resort Pool was the only post-hole testing area to contain natural jaucus sand sediments at a depth which could be impacted by the proposed improvements. Therefore, two, two meter by two meter, test units were excavated on the makai end of the Resort pool area. The first test unit contained disturbed sand sediment including cobbles, boulders. and yielded several notable cultural finds and isolated human bones. approximately 147 centimeters below surface (cmbs), a coral file was found. A human thumb was recovered in the screen from the northeast portion of the test unit. The thumb was found approximately 70 cmbd in disturbed sand. A foot bone was found in the southwest portion of the test unit at approximately 117 cmbd. The second test unit contained very little cultural material in disturbed sand. Once jaucas sand sediments, were observed, the base of excavation was leveled and new artifact bags were assigned. Features found were defined as either trash pits, possible post-molds, or indefinable. Several of the possible post-mold features are seen in profile walls and appear to originate from the disturbed sand stratum, indicating a later age of construction. Archaeological Assessment Report recommends the preparation of an Archaeological Monitoring Plan to be implemented prior to commencing construction work. A draft Archaeological Monitoring Plan will be submitted to

- the State Historic Preservation Division for review and approval. The reports are reproduced in Appendix C and D.
- To the extent that subsurface impacts into relatively undisturbed sediments can be minimized, the extent of finds will be minimized. One approach is through the importation of fill and having much of the work within these clean fill deposits. Another approach is to bundle utilities within narrow corridors, if feasible. Another approach is to minimize the area of foundation footing within relatively undisturbed sediments.
- Traditional Hawaiian burials were typically quite shallow-in the nature of 1.5 to 3.5 feet below the original ground surface. The one in-situ burial (SIHP # 50-80-14-5937) reported in the proposed areas of work is reported at a depth of two feet (51 to 62 cm; Elmore et al. 2001:8) below ground surface. Thus, efforts to avoid impacts to human remains or other historic properties by minimizing depth of excavation will have little impact if the excavation exceeds a foot or so into natural sediments. It is our understanding that in the vicinity of SIHP # 50-80-14-5937, substantial importation of fill is indicated. Capping native sediments with fill deposits and running conduits and placing foundation footings within the fill deposits would effectively avoid potential adverse impacts to historic properties as may be present.
- If the nature and extent of most or all of the subsurface impacts is to be within fill layer already present or within imported fill then there is a good argument for no further archaeological work in those areas or, if any work is to be required, for an archaeological monitoring program. If subsurface impacts in one or more areas are to be spotty (as in the case of small excavations for landscaping with trees and shrubs) or largely linear (as in the case of narrow utility corridors) there may be an argument for addressing the impacts within an archaeological monitoring program.
- As discussed in the Preface, the Master Plan does not propose improvements within the grove of coconut palms located in the eastern courtyard of the Royal Hawaiian Hotel as shown in Figures 4 and 5. A previously initiated landscape maintenance program for the Coconut Grove has been ongoing in recent years and includes the removal and replacement of coconut trees that are damaged, deteriorating or too tall and thin to be safely maintained. The most recent evaluation identified 14 palms for replacement. Since the eastern courtyard will be used as a storage area for furnishings and some construction material to be used during the construction phase of the proposed improvements at the Royal Hawaiian Hotel, the palms to be replaced will be removed prior to construction and replaced following construction when the landscaping is restored. A treespecific Tree Protection Plan for the remaining trees in the eastern courtyard, as well as a draft Landscape Maintenance Program Plan discussing management practices for protecting trees during construction of the proposed Master Plan improvements, in general, has been added to Appendix A.

2.8.2. Historic Resources

The Royal Hawaiian Hotel opened on February 1, 1927. As the largest construction project in the Pacific for its time, it represented a quantum leap forward for the visitor industry in Hawaii. The hotel's New York-based architects, Warren & Wetmore, were among the premier hotel designers in America and the Royal Hawaiian Hotel gardens were laid out by the nationally

renowned Santa Barbara landscape architect, R.T. Stevens. Using Spanish and Moroccan influences, the architects created the pink jewel of Waikiki Beach. Its slightly modified H-plan invites the trade winds and features a six story main body. A central lobby runs perpendicular to U-shaped wings, resulting in courtyards on all four sides. A product of the pre-modular and pre-standardization era, there are over one hundred and fifty different configurations of guest rooms.

The Hotel catered to an affluent clientele including the Rockefellers, Fords, DuPonts, Henry J. Kaiser, the Shah of Iran, Clark Gable, Bing Crosby, Mary Pickford, Douglas Fairbanks, Al Jolson, George Burns and Gracie Allen, Franklin D. Roosevelt, and a host of other celebrities. During World War II the pink palace served as a rest and recreation center primarily for Naval aviators and submariners. Following the war, the interior was gutted and the original dining wing demolished, making way for the present Monarch Room. Since then, the Royal Hawaiian Hotel has undergone several remodeling and renovation projects, including one in 1958 and another in 1969. The sixteen-story Royal Tower Wing was later added in 1969.

Modifications of the hotel also include use of the Coconut Grove Lanai, which was operated as a semi-outdoor cocktail lounge and soda fountain during the period 1935-1946. It was later replaced with retail shops, then in 1960 a portion of it was then reinstated as a cocktail lanai. The Lurline Room was constructed in 1956 and then remodeled in the 1970's. The Monarch Room and Surf room were added to the hotel in 1946 and substantially altered in 1957 and 1964.

The character-defining features contributing to the significance of the Royal Hawaiian Hotel building include:

- The structural form of the building;
- The exterior plaster veneer, painted pink;
- The existing porte-cochere's main entrance with round arches, tuscan columns and buttressed piers;
- The flat roofed lanai fronting the east court;
- The 1927 fenestration and its accompanying decorative elements which include greenpainted bamboo-like awnings, balconies with wrought iron and terra cotta fronts, and double doorways (none of the windows and doors are originals and were likely replaced during the 1980s renovation);
- Two domed campaniles:
- Four square towers located on the rooftop of the wings and main body;
- Baroque, curvilinear parapets;
- Scalloped parapets with terra cotta planters at the rooftops of the central structure and wings:
- Blue tile roof sections:
- Copper roof sections over the balconies;
- All of the cast concrete shields and plaques applied to the exterior walls;
- Open entry archways;
- Open entry archways leading to the main lobby from the porte-cochere and east court lanai;
- The hand-glazed ceramic tile pattern on the exterior planter boxes along the East Veranda;
- Exterior landscape's major trees including the banyan trees, monkey pod trees, and Coconut Grove on the east side of the building; and,

The circular driveway leading to the porte-cochere on the west side of the hotel.

Impact and Mitigation Measures

The Royal Hawaiian Hotel is identified in the City and County of Honolulu's "Waikiki Special District Guidelines" among "structures, sites and landmarks" identified by the Department of Land and Natural Resources (DLNR) as "having scenic, cultural, historic or architectural significance" and "may possess qualities which make them eligible for listing on the register of historic places". The Royal Hawaiian Hotel is not listed on either the National or State Register of Historic Places. The proposed improvements to the Royal Hawaiian Hotel, including the relocation of the porte-cochere, pool renovation, interior renovations and exterior repair of the awnings were presented at a meeting with the State Historic Preservation Division on March 30, 2007 (see Exhibit B). Subsequently, the proposed new Royal Hawaiian Hotel porte-cochere has been eliminated from the Final EA submission.

The proposed improvements are not specifically intended to restore the building to its original form; they will be consistent with the aesthetic character of the building. It is the intent of the applicant to review the proposed improvements with the Secretary of Interior's Standards for the Treatment of Historic Properties pertaining to rehabilitation. The standards are neither technical nor prescriptive, but their stated intent is consistent with the applicant's commitment to stewardship in preserving the historic character of the hotel for tourism, Waikiki and the State of Hawaii. Notably, some of the previous interior modifications that detract from the hotel's unique character will be removed. The opening of the round archways flanking the original entry stair, the East Veranda, Royal Hawaiian Hotel swimming pool, and the alterations to the Monarch Room, Surf Room and Lurline Room will have no effect on the character of the Royal Hawaiian Hotel. The Waikiki Special District minor permit application required for the proposed improvements at the Royal Hawaiian Hotel will be submitted to the City's Department of Planning and Permitting, and the Department of Land and Natural Resources for review and comment.

It is anticipated that additional mitigation measures will include:

- 1. Photographic documentation;
- 2. Placing a copy of the 1954 floor plans for the hotel at an appropriate repository; and,
- 3. Architectural site monitoring of construction by an historic architect whenever historic materials are to be modified in the north facing, mauka wing and the East Veranda.
- 4. In consideration of the hotel's context in tourism, Waikiki and the State of Hawaii, review and evaluate the proposed renovations with an historic architect and in consultation with the Historic Hawaii Foundation as they relate to the Secretary of the Interior Standards and Guidelines for Rehabilitating Historic Buildings.

2.8.3. Cultural Resources

The area including and surrounding the project site has undergone extensive urbanization and development over the years, with the construction of the existing hotel facilities, infrastructure, and Royal Hawaiian Shopping Center. Accordingly, the traditional and cultural practices that are traditionally found in rural or less developed areas (for example traditional and customary gathering rights, religious practices, etc.) are virtually non-existent. There are no surface

archaeological sites or known sacred sites within the project site. With regard to any potential traditional fishing and gathering resources associated with the ocean fronting the project site, public access to ocean resources will continue to be available along the shoreline. It should be noted, however, that a modern revival of traditional cultural practices is featured at various venues within both resort properties, primarily for the purpose of entertainment, but also for cultural education and interpretation, including hula, chants, and other cultural practices.

Impacts and Mitigation Measures

The proposed renovations are not anticipated to adversely impact cultural practices within the project site. While the possibility for uncovering human burial remains within the project site is high, the proposed action was designed to minimize disturbance of previously undisturbed soils.

Kuʻiwalu, cultural consultant for the Project, engaged in proactive early consultation meetings with SHPD. The first meeting occurred on April 9, 2007 to provide SHPD with an overview of the proposed improvements to the Royal Hawaiian Hotel and Sheraton Waikiki. The purpose of the initial meeting was to discuss proposed archaeological work on the project site and potential burial issues that may be encountered. An initial draft of the Draft EA was submitted to SHPD for their review and comments. As a result of these early consultation meetings, Kyo-ya agreed to prepare: (1) an Archaeological Inventory Survey (AIS) Plan to be approved by SHPD before commencement of the actual archaeological survey, and (2) an AMP for Geotechnical Testing of the Project site. SHPD also provided a list of recognized cultural and lineal descendants in the Waikiki Ahupuaa. Ku'iwalu will continue to engage in on going coordination with SHPD during the course of the project activities.

A public notice was posted in two major newspapers (*The Honolulu Advertiser and Star Bulletin*) and OHA's *Ka Wai Ola O OHA*, requesting persons with information related to the Project site and any cultural information, including location of burial sites, to directly contact Ku'iwalu. The public notice was published on June 3, 2007. Ku'iwalu provided a 30 day comment period.

On June 13, 2007, a formal informational presentation was made before the Oahu Island Burial Council on the proposed improvements to the Royal Hawaiian Hotel and Sheraton Waikiki hotels (see Exhibit B). The OIBC suggested that Kyo-ya follow up with Kamehameha Schools to identify a potential re-interment site for known and potential human burial remains that may be discovered on the Project Site. Early consultation with OIBC, SHPD, Kyo-ya and its consultants and collaboration with Kamehameha Schools has facilitated the mutual selection of a re-interment site. This location was determined to be the most suitable and peaceful area whereby the potential and recognized cultural and lineal descendants can pay their respects in future years to come (see Exhibit C). The OIBC also permitted coordination on burial related matters that do not require official Council action with the OIBC Kona representative, Ms. Kehaulani Kruse.

Ku'iwalu has assisted Kyo-ya in the convening of appropriate cultural blessings of the project site and will continue this coordination as work continues on the Project.

On September 13, 2007, Kuʻiwalu convened the initial Informational Meeting with potential lineal and cultural descendants (Kaleikini, Keaohokalole, Kuhea, Medeiros, Norman, Grace, Hatchie, Kalahiki, Rabago, Reeves, and Shirai) as well as appropriate native Hawaiian organizations (OIBC, Mamakakaua, Waikiki Community Center, The Hale O Na Aliʻi O Hawai'i, Royal Order of the Crown of Hawaiʻi, Waikiki Hawaiian Civic Club, Office of Hawaiian Affairs, The Ahahui Kaahumanu, and Royal Order of Kamehameha). The invitees were provided an overview of the proposed project improvements, overview of the proposed archaeological work on the project site, and proposed consultation process in the event human burial remains are discovered during construction or related activities. The consultants will continue to keep the potential lineal and cultural descendants informed on matters involving burial issues related to the project.

Great effort has been taken by the project design team to minimize impacts to the potential discovery of human burial remains by constructing on previously imported fill and minimizing excavation other than what is necessary for public health, safety and welfare.

There will be a concerted effort to re-establish some of the traditional cultural practices, including story telling, traditional crafts, traditional plants (including some of the original coconut trees from the site), and traditional arts and dance into the visitor experience.

2.9. Views

None of the streets or locations in the immediate vicinity of the project site are identified as significant public view corridors in the Waikiki Special District (WSD) guidelines pursuant to Section 9.80-3(a) of the Land Use Ordinance.

Impacts and Mitigation Measures

The proposed renovations are intended to improve the visual character of the Royal Hawaiian Hotel and Sheraton Waikiki properties to convey a Hawaiian sense of place consistent with the WSD guidelines.

2.10. Socio-Economic Characteristics

Population and Housing: The 2000 Census reported the population of Oahu at 876,156. According to a demographic profile of various Oahu neighborhoods prepared by the City's Department of Planning and Permitting (2000 Census data), Neighborhood Area 9, Waikiki, had a population of 19,720. Compared with Oahu as a whole, the Waikiki population is generally older; has a racial mix with proportionately more Whites and fewer Asians and Native Hawaiian or Pacific Islanders. There is a much lower proportion of family households and an even lower proportion of households with children under 18. Proportionately, homeownership rates are lower, and vacancy rates are greater (See Table 3).

Economy: The Waikiki Neighborhood Area 9 is comprised of six census tracts including 18.01, 18.02, 19.01, 19.02, 20.1, and 20.2. According to the 2000 Census data, the median household income for Waikiki Neighborhood Area 9, ranges from \$25,865 to \$37,018, which is significantly lower than the median household income of \$51,914 for Oahu.

Table 3 Demographic Characteristics: 2000						
	Neighborho	od Area #9	Oa	hu		
Subject	Number	Percent	Number	Percent		
Total population	19,720	100	876,156	100		
AGE	400	2.5	E/ 0/10			
Under 5 Years	688 1,187	3.5 6.0	56,849 151,909	6.5 17.3		
5 – 17 years	1,187	72.1	549,661	62.7		
18 – 64 years	3,623	18.4	117,737	13.4		
65 years and over	5,020	10.1	111,131	10. 1		
Median age (years)	42.2		35.7			
RACE (alone or in combination with other races)						
White	10,005	50.7	308,838	35.2		
Black or African American	605	3.1	29,764	3.4		
American Indian and Alaska Native	292	1.5	15,921	1.8		
Asian	8,876	45.0	539,384	61.6		
Native Hawaiian and other Pacific Islander	1,725	8.7	189,292	21.6		
Other	534	2.7	32,003	3.7		
HOUSEHOLD (BY TYPE)						
Total Households	11,397	100	286,450	100		
Family households (families)	4,087	35.9	205,672	71.8		
With own children under 18 years	1,167	10.2	91,022	31.8		
Married-couple family	3,129	27.5	156,195	54.5		
With own children under 18 years	777	6.8	70,442	24.6		
Female householder, no husband present	643	5.6	35,138	12.3		
With own children under 18 years	293	2.6	15,235	5.3		
Non – families	7,310	64.1	80,778	28.2		
Living with non-relatives	1,475	12.9	18,815	6.6		
Living alone and 65 years and over	1,503	13.2	20,021	7.0		
Average persons per household	1.72		2.95			
HOUSING OCCUPANCY AND TENURE			 			
Total Housing Units	18,370	100	315,988	100		
Occupied units	11,397	62.0	286,450	90.7		
By owner	3,819	20.8	156,290	49.5		
By renter	7,578	41.3	130,160	41.2		
Vacant units	6,973	38.0	29,538	9.3		
Available housing vacancy rate (%)	23.1	ı	4.9			
Homeownership rate (%)	33.5		54.6			

Source: 2000 Census SF1 File, City & County of Honolulu, Department of Planning & Permitting, Planning

Chapter 2: Description of the Existing Environment, Project Impacts and Mitigation Measures

Division

Impacts and Mitigation Measures

Population and Housing: No impacts on the population and the housing inventory in Waikiki are anticipated to result from the proposed action, as it does not involve residential uses.

Economy: In the short term, an estimated expenditure of \$84 million during the anticipated 18-month construction period will confer some positive benefits to the local economy. This would include generating indirect sales of approximately \$80.6 million, for a total expenditure and sales of approximately \$164.6 million. An annual average of approximately 406 construction jobs and 552 support jobs would also be created, with average annual total earnings of \$34.2 million during the construction period. State and County Tax revenue associated with construction expenditures would be approximately \$9.5 million over the construction period.

2.11. Public Services

2.11.1 Police Services

Waikiki is located within the Honolulu Police Department's District 6, and is patrolled by officers stationed at the substation located on Kuhio Beach. In addition, several volunteer citizens groups, including the Waikiki Citizens Patrol and Aloha Patrol, regularly walk around Waikiki during some evenings, offering advice and directions to tourists and directing police attention as needed.

Impacts and Mitigation Measures

In the short-term, construction-related impacts such as dust emissions, noise, and traffic will likely increase demand for police services in the vicinity of the project site. In the long-term, the proposed project will continue as an existing resort use with no anticipated change in the level of demand for police services.

The proposed internal roadway improvements will increase queuing capacity within the project site for buses and other vehicles and improve wayfinding to facilitate traffic flow. This is anticipated to reduce the potential for queuing along driveways from impacting adjacent streets, and improve pedestrian safety.

2.11.2 Fire Services

Waikiki is located within the Honolulu Fire Department's (HFD) Battalion Two. It is served by the Waikiki and McCully Fire Stations located on Kapahulu Avenue and Date Street, respectively. The former is equipped with a fire engine and ladder truck, while the latter is equipped with a fire engine.

Impacts and Mitigation Measures

The proposed renovations will comply with the 1997 Uniform Fire Code and current building codes for fire protection. The vehicular circulation renovation for the Sheraton Waikiki will improve access for fire trucks, and the proposed action will positively impact demand for fire protection services. The two existing fire apparatus access points will be maintained. The Honolulu Fire Department will be consulted regarding fire protection requirements during the design phase of the proposed renovations. In addition, the

HFD's Fire Communications Center will be notified regarding any interruption of the existing fire hydrant system during construction.

2.11.3 Medical Services

The proposed project site is less than five miles from four of the state's major hospitals: Straub Hospital, Queen's Hospital, Kapiolani Hospital for Women and Children, and the Kaiser Permanente Honolulu Clinic. These hospitals offer a full range of emergency and acute-care services. Physicians' offices are also located throughout the Honolulu area. Within Waikiki, Queen's Hospital operates a walk-in clinic at the Hilton Hawaiian Village, less than one mile west (Ewa) of the project site.

Impacts and Mitigation Measures

No significant impacts to medical services are anticipated as the proposed project will continue as an existing resort use.

2.12. Public Educational Services

The project is located in the State Department of Education's Honolulu District, and is serviced by the Ala Wai Elementary School, Washington Middle School, and Kaimuki High School.

Impacts and Mitigation Measures

No impacts on public educational services are anticipated as the proposed project involves no residential uses.

2.13. Recreation

Various public recreational opportunities are provided throughout Waikiki. These include Waikiki, De Russy, Sans Souci Beach, and Queens Surf beaches, Kapiolani Park, Ala Wai Golf Course, Ala Wai Field and Golf Course, Ala Wai Canal, and Ala Wai Boat Harbor. Public beach accesses are located adjacent to the Diamond Head and Ewa boundary of the project site. Public access is available along the shoreline fronting the project site. In the area fronting the Sheraton Waikiki, the walkway atop a concrete seawall provides access during high tide when waves reach the seawall.

Impacts and Mitigation Measures

No impacts on the demand for recreational opportunities are anticipated because the proposed project involves a reduction of 32 guestrooms. The existing public beach access and lateral shoreline walkway will not be impacted by the proposed renovation.

2.14. Traffic

Access to the Royal Hawaiian Hotel and Sheraton Waikiki is provided through Royal Hawaiian Avenue and Don Ho Lane. An existing gated access to the Sheraton Waikiki Parking Garage is also provided through Helumoa Road. Service access for back-of-house operations at the Sheraton Waikiki is provided via Kalia Road and Helumoa Road.

Traffic on Kalakaua Avenue and Lewers Street operates fairly well during the peak hours of traffic and are impacted by high visitor pedestrian traffic crossing the intersections.

The tour bus terminal on the first floor of the Sheraton Waikiki Parking Garage, utilizes the same entrance as guest vehicles from Don Ho Lane. The buses exit onto Helumoa Road. Occasionally, the buses queue from the bus terminal area onto Royal Hawaiian Avenue between Don Ho Lane and Kalakaua Avenue due to congestion in the bus terminal area. In addition, there are times in the morning when the buses queue on Royal Hawaiian Avenue fronting the Duty Free Shops mauka of Kalakaua Avenue. The congestion outside of the bus terminal area on Don Ho Lane and Royal Hawaiian Avenue affects access to the Sheraton Waikiki's and Royal Hawaiian Hotel's porte-cochere, the Sheraton's parking garage, the Royal Hawaiian Shopping Center's parking garage, Kalakaua Avenue and Lewers Street. In addition, large vehicles create additional blind spots for pedestrians attempting to cross Royal Hawaiian Avenue and Don Ho Lane.

Impacts and Mitigation Measures

The proposed renovations at the Sheraton Waikiki and Royal Hawaiian Hotels will eliminate a total of 32 guestrooms. Therefore, no significant additional new trips on the public roadways surrounding the hotels and will be generated.

The new Sheraton Waikiki porte-cochere should increase the vehicular queuing capacity fronting the Sheraton Waikiki and will improve traffic operations at the Royal Hawaiian Avenue/Don Ho Lane intersection and reduce the potential of queue spill-back onto public roadways.

Reversing the direction of flow for the bus terminal in the Sheraton Waikiki parking garage will reduce the potential for congestion that causes buses to queue onto Don Ho Lane and Royal Hawaiian Avenue. Instead, buses will queue within the service lane between Helumoa Road and Kalia Road away from the pedestrians and other vehicular traffic. In addition, the buses will queue on Sheraton Waikiki property, as opposed to public roadways. Reversing the flow of the buses will not result in a significant traffic impact on the public roadways surrounding the Sheraton Waikiki and Royal Hawaiian Hotels since the buses currently utilize these roadways in the opposite direction.

2.15. Utilities

2.15.1 Storm Drainage System

The storm drainage systems of the Royal Hawaiian and Sheraton Waikiki hotels are not connected to any municipal system. Rainfall runoff within the hotel properties is dissipated into on-site seepage pits, leaching fields, percolation beds, or injection wells. With the exception of periods of high tide compounded with heavy and extended rainfall periods, when temporary and localized ponding may occur, the hotel property does not experience any drainage problems.

Impacts and Mitigation Measures

No significant impacts on the municipal drainage systems serving the project site are anticipated. The proposed renovation will not significantly increase the net area of impervious surface. Modification of drainage patterns and facilities within the project site will direct, detain and facilitate percolation of drainage to minimize impacts on municipal drainage systems.

2.15.2 Sanitary Sewer System

Wastewater services for the Royal Hawaiian and Sheraton Waikiki hotels are integrated and shared. These systems include 6- and 8-inch sewer lines in Kalia Road, and a 15-inch sewer line in Helumoa Road on the west side of the Sheraton Waikiki. Both the Kalia Road and Helumoa Road sewer lines are connected to the municipal sewer lines in Lewers Street, which include two parallel 15-inch sewer lines between Helumoa Road and Kalakaua Avenue, and an 8- and a 10-inch sewer line between Helumoa Road and Kalia Road.

Impacts and Mitigation Measures

Based on wastewater computations prepared by the City, a portion of the 15-inch sewer line between Kalakaua Avenue and Helumoa Road, and a segment of the 6-inch sewer line in Helumoa Road would be surcharged or its capacity would be theoretically exceeded based on parameters specified in the model. Nevertheless, a slight reduction of wastewater demands will be achieved as 32 guestrooms in the Sheraton Waikiki will be eliminated, reducing the available Sheraton Waikiki guest room inventory to 1,642 guestrooms and approximately 158 lavatories in the Royal Hawaiian Hotel are upgraded to low-flush (1.6 gallons), contributing to the recently upgraded 1,492 low-flush toilets. No upgrades or improvements to the existing sanitary sewer system are anticipated to be required because the proposed action will not increase peak-sewage flow quantities.

Regular filter backwash discharge of the swimming pools, and occasionally, complete pool water discharge will be made into the municipal sewer system, during off-peak periods, if necessary.

2.15.3 Water System

The Royal Hawaiian Hotel receives water from a private water system identified as "Public Water System No. 330." The system is classified as a Nontransient Noncommunity Water System and is owned by Kyo-ya Co., Inc. The system serves the Princess Kaiulani Hotel, the Sheraton Moana Hotel and the Royal Hawaiian Hotel. The private system serves approximately 2,830 people and has three services connections.

Water supply for the Sheraton Waikiki is provided by the Honolulu Board of Water Supply (BWS). Fronting the Royal Hawaiian Shopping Center along Kalakaua Avenue, the BWS water system includes an 8-inch water line located on the makai or ocean side the street. There is an abandoned 6-inch waterline in Kalakaua Avenue.

BWS records indicate the following meters servicing the Sheraton Waikiki:

- Two 6-inch turbine meters located along Helumoa Street
- 6-inch compound meter located along Kalakaua Avenue
- 6-inch detector check meter located at Kalakaua Avenue

Impacts and Mitigation Measures

Project engineering personnel indicate that in times of high demand and heavy usage, the upper floors experience some pressure problems, which require the use of the hotel booster system. Recently implemented improvements to increase water usage efficiency, and conserve water, include the replacement of 1,492 toilets with low-flush (1.6 gallon) toilets. Operations and Maintenance plan to replace the remaining 158 toilets with low-flush toilets. Hotel engineering personnel have mentioned that the

utilities of the Sheraton Waikiki and the Royal Hawaiian Hotel are integrated and could be shared. If required, the Sheraton Waikiki water system could be supplemented by drawing from the private water system supplying the Royal Hawaiian Hotel.

The existing large trees within the Royal Hawaiian hotel entry way will be incorporated into the landscaping enhancements. This feature shall maintain the existing shade cover that will reduce the effects of evaporation on the proposed water feature adjacent to the grand staircase. The evaporation rate for the Resort Pool is further reduced as the pool is situated between the 290-foot tall Sheraton Waikiki structure, to its west, and the Royal Hawaiian Hotel to its east, limiting the amount of direct sunlight it receives each day.

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3. RELATIONSHIP TO LAND USE PLANS, POLICIES AND CONTROLS

This section discusses State and City and County of Honolulu land use plans, policies and controls relating to the proposed project.

3.1. State Land Use District

The Hawaii Land Use Law, contained in Chapter 205, Hawaii Revised Statutes, classifies all land in the State into four land use districts: Urban, Agricultural, Conservation, and Rural. The project site is designated within the Urban District which includes "lands characterized by city-like concentrations of people, structures, streets, urban level of services and other related land uses." The proposed project is consistent with the Urban classification (see Figure 8).

3.2. City and County of Honolulu

3.2.1 Primary Urban Center Development Plan

On June 21, 2004, the City & County of Honolulu's Primary Urban Center (PUC) Development Plan went into effect. The Plan is one of eight regional plans covering the Island of Oahu. As mandated by the City Charter, the plans set forth City policy to guide zoning, land use, and public investment in manner that is consistent with and supports the General Plan of the City & County of Honolulu.

The PUC Development Plan Land Use Map designates the project site "Resort". This designation is a mixed-use designation that is consistent with the resort and commercial uses at the Royal Hawaiian Hotel and Sheraton Waikiki. Section 2.2.3 of the PUC Development Plan states:

"Resort districts consist primarily of resort hotels, timeshares, and other apartments used as temporary visitor units (TVUs); and supporting commercial uses, such as shops, restaurants, and entertainment. This designation only applies to the Waikiki, Marina, Hobron, and Fort DeRussy neighborhoods".

The project's consistency with the PUC Development Plan land use and transportation policy and guidelines is discussed below.

Objective: Section 3.1.1.3 Access to Shoreline, Mountains and Streams "Public access to the shoreline, which is located at intervals of one-quarter mile or less, is adequately provided. The public sector should assume ultimate responsibility for the maintenance and security of such a highly public area because continuous, safe access for pedestrians and wheelchairs along the beach serves a clear public purpose."

Comment: There are multiple public beach accesses available throughout the length of Waikiki Beach. Perpendicular public beach access is provided adjacent to the Diamond Head and Ewa boundaries of the project site. Lateral public beach access is also available along the shoreline fronting the project site. In the area fronting the Sheraton Waikiki, there is a perpetual easement or right-of-way for the general public in favor of the State of Hawaii along the top of the concrete seawall. The State of Hawaii has the duty to maintain the seawall in a safe condition for pedestrian traffic.

Objective: Section 3.1.3.1 Historic and Cultural Sites

"Preserve the architectural character, landscape setting and visual context of historic landmarks through appropriate zoning standards and development controls, as necessary, and public outreach programs such as design guidelines for the maintenance, renovation or expansion of older dwellings."

Comment: While the proposed improvements are not specifically intended to restore the building to its original form, they will be consistent with the aesthetic character of the building. Moreover, some of the previous interior modifications that detract from the hotel's unique character will be removed. The opening of the round archways flanking the original entry stair, the East Veranda, Royal Hawaiian Hotel swimming pool, and the alterations to the Monarch Room, Surf Room and Lurline Room will have no effect on the character of the Royal Hawaiian Hotel. The Waikiki Special District-minor permit application required for the proposed improvements at the Royal Hawaiian Hotel will be submitted to the City's Department of Planning and Permitting and Department of Land and Natural Resources for review and comment.

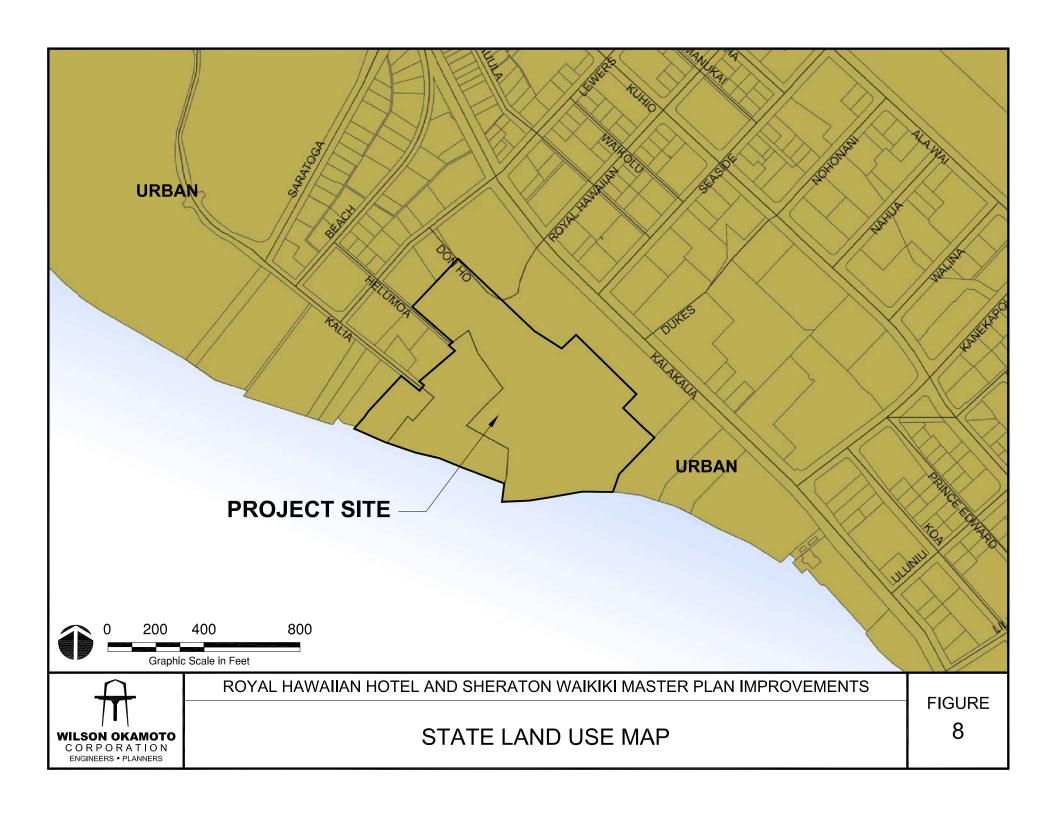
Objective: Section 3.5.1.4 Walking

"There is an opportunity to create small "pedestrian districts" through focused improvements within existing in-town neighborhoods. Rights-of-way for minor streets in medium-and high-density residential neighborhoods could be redeveloped to give more space to trees, sidewalks, and even small park spaces."

Comment: The proposed renovations should enhance the visitor arrival experience by facilitating wayfinding, improve pedestrian circulation and improve pedestrian safety. This realignment, complemented by the reconfiguration of the lobby, guest circulation, and landscaping enhancements will improve the visitor and public pedestrian and vehicular circulation within the site and return the makai portion of the property to pedestrian-only use.

3.2.2 Waikiki Livable Community Projects

The Waikiki Livable Community Project (WLCP) is a planning study prepared by the City and County of Honolulu Department of Transportation Services through a grant from the Federal Highway Administration's Transportation and Community and System Preservation Pilot Program and federal funding from the Oahu Metropolitan Planning Organization. The WLCP takes a broad view of the diverse needs that the transportation system in this bustling urban resort and residential community serves, with the goal of improving its uniquely "Hawaiiansense" of livability. This sense of livability draws from concepts contained in George Kanahele's 1994 watershed book Restoring Hawaiianness to Waikiki, in which Kanahele called for Waikiki to become a "community of Aloha." In particular, the WLCP recognized that this sense of livability is experienced daily and most directly by the thousands of visitors, residents, and workers, who, as pedestrians walk along Waikiki's streets and sidewalks. Hence, it adopted a "Pedestrian First" policy advocated by a joint City-State task force report to the Legislature entitled "Recapturing the Magic of Waikiki" (December, 1999). The WLCP pursued a community-based effort to solicit comprehensive input on the issues, options, and opportunities for creating and achieving a shared vision of a more livable Waikiki and charting a new course toward that vision. These are documented in the Livability and Mobility Report.



The Royal Hawaiian Hotel and Sheraton Waikiki properties do not have frontages along major streets such as Kalakaua Avenue or Lewers Street. The properties, however, abut existing public shoreline accesses along the Diamond Head and Ewa boundary and front the shoreline, along which the public has access. These will be preserved.

3.2.3 Special Management Area (SMA)

The majority of the project site lies within the boundary of the City and County of Honolulu's SMA (see Figure 9). Proposed improvements within the SMA, are subject to SMA permit requirements pursuant to Section 205A, HRS, and Chapter 25 Revised Ordinances of Honolulu.

Of the proposed improvements, those that are considered exempt from an SMA Use Permit are interior improvements and repair and maintenance. Proposed improvements outside of the SMA are not subject to SMA Use Permit requirements. These include the improvements to the driveway area fronting the Sheraton Waikiki.

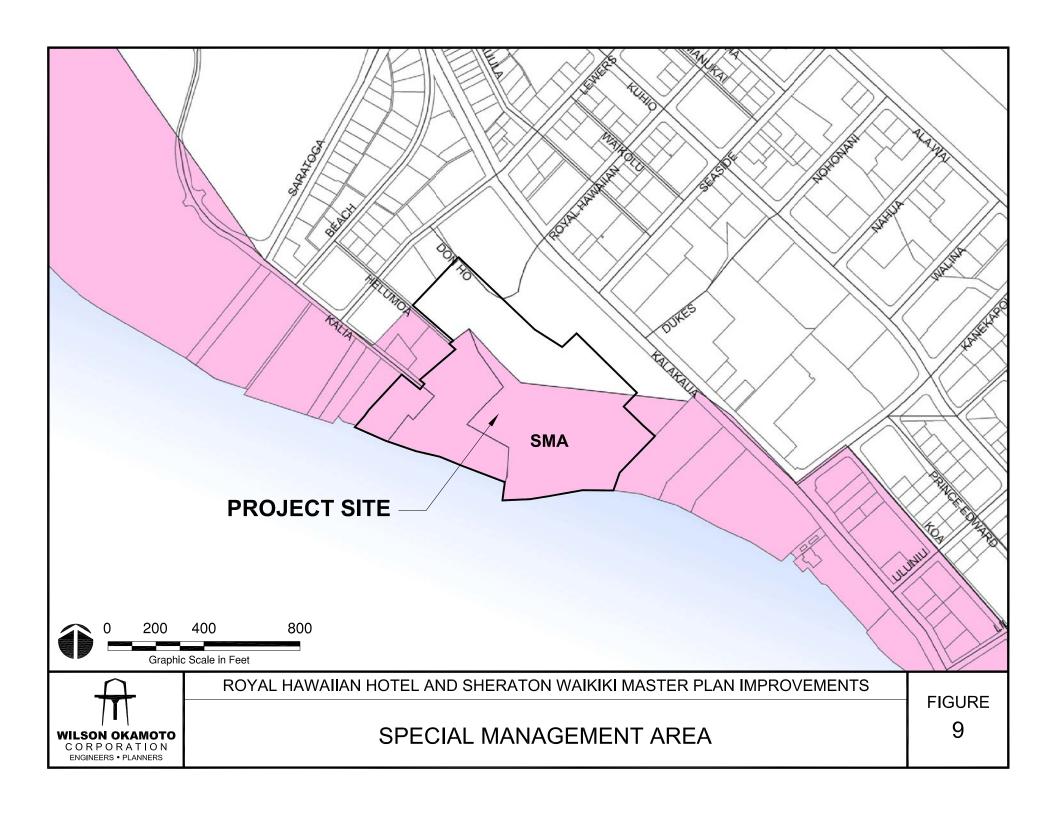
The objectives, policies and SMA guidelines, as set forth in *Chapter 205A, Hawaii Revised Statutes*, are intended to ensure that adequate shoreline access is provided, public recreation and wildlife preserves are reserved, and that minimum adverse effects to water, visual and natural resources are assured. The project's consistency with the Coastal Zone Management Program is discussed below.

(1) Recreational Resources

Objective:

Provide coastal recreational opportunities accessible to the public. Policies

- (A) Improve coordination and funding of coastal recreational planning and management; and
- (B) Provide adequate, accessible, and diverse recreational opportunities in the coastal zone management area by:
 - (i) Protecting coastal resources uniquely suited for recreational activities that cannot be provided in other areas;
 Requiring replacement of coastal resources having significant recreational value, including but not limited to surfing sites, fishponds, and sand beaches, when such resources will be unavoidably damaged by development; or requiring reasonable monetary compensation to the state for recreation when replacement is not feasible or desirable;
 - (ii) Providing and managing adequate public access, consistent with conservation of natural resources, to and along shorelines with recreational value;
 - (iii) Providing an adequate supply of shoreline parks and other recreational facilities suitable for public recreation;



- (iv) Ensuring public recreational use of county, state, and federally owned or controlled shoreline lands and waters having recreational value consistent with public safety standards and conservation of natural resources;
- (v) Adopting water quality standards and regulating point and non-point sources of pollution to protect, and where feasible, restore the recreational value of coastal waters.
- (vi) Developing new shoreline recreational opportunities, where appropriate, such as artificial lagoons, artificial beaches, and artificial reefs for surfing and fishing; and
- (vii) Encouraging reasonable dedication of shoreline areas with recreational value for public use as part of discretionary approvals or permits by the land use commission, board of land and natural resources, county planning commissions; and crediting such dedication against the requirements of Section 46-6, HRS.

Comment: Development of the proposed project preserves the existing public access walkways located on the Diamond Head and Ewa boundaries of the project site and fronting the Sheraton Waikiki. The project will have no adverse effect on access to recreational resources and construction and operation of the facility will have no adverse effect on the quality of public recreational opportunities.

(2) <u>Historic Resources</u>

Objective:

Protect, preserve and, where desirable, restore those natural and manmade historic and prehistoric resources in the coastal zone management area that are significant in Hawaiian and American history and culture.

Policies:

- (A) Identify and analyze significant archaeological resources;
- (B) Maximize information retention through preservation of remains and artifacts or salvage operations; and
- (C) Support state goals for protection, restoration, interpretation, and display of historic resources.

Comment: The proposed project has been designed to minimize potential impacts on archaeological, historic, and cultural resources as discussed in Section 2.8.

(3) Scenic and Open Space Resources

Objective:

Protect, preserve, and where desirable, restore or improve the quality of coastal scenic and open space resources.

Policies:

- (A) Identify valued scenic resources in the coastal zone management area;
- (B) Ensure that new developments are compatible with their visual environment by designing and locating such developments to minimize the alteration of natural landforms and existing public views to and along the shoreline;
- (C) Preserve, maintain, and, where desirable, improve and restore shoreline open space and scenic resources; and
- (D) Encourage those developments which are not coastal dependent to locate in inland areas.

Comment: The proposed project will have no significant impact on open space or scenic resources. None of the streets or locations in the immediate vicinity of the project site are identified as significant public view corridors in the Waikiki Special District (WSD) guidelines pursuant to Section 7.80-3(a) of the Land Use Ordinance. The proposed renovations are intended to improve the visual character of the Royal Hawaiian and Sheraton Waikiki hotels to convey a Hawaiian sense of place consistent with the WSD guidelines.

(4) Coastal Ecosystems

Objective:

Protect valuable coastal ecosystems, including reefs, from disruption and minimize adverse impacts on all coastal ecosystems.

Policies:

- (A) Improve the technical basis for natural resource management;
- (B) Preserve valuable coastal ecosystems, including reefs, of significant biological or economic importance;
- (C) Minimize disruption or degradation of coastal water ecosystems by effective regulation of stream diversions, channelization, and similar land and water uses, recognizing competing water needs; and
- (D) Promote water quantity and quality planning and management practices which reflect the tolerance of fresh water and marine ecosystems and prohibit land and water uses which violate state water quality standards.

Comment: The water offshore of the project site is designated Class A waters. There is the potential for storm water discharge to impact the marine environment during the short-term construction period, when site preparation will be required. Project construction is anticipated to disturb the more than one-acre of the project site. As such, a National Pollutant Discharge Elimination System (NPDES) Permit will be required from the State of Hawaii Department of Health (DOH). A Best Management Practices (BMP) Plan, which will include measures to mitigate potential water quality impacts, will be submitted to the DOH in conjunction with the NPDES application. BMP measures will include such practices as phased grading, soil stabilization using sheets or fabric, vegetative controls, and proper vehicle maintenance. In the long-term, the project will not significantly adversely impact the nearby coastal ecosystems.

(5) Economic Uses

Objective:

Provide public or private facilities and improvements important to the State's economy in suitable locations.

Policies:

- (A) Concentrate coastal dependent development in appropriate areas;
- (B) Ensure that coastal dependent developments such as harbors and ports, and coastal related development such as visitor facilities and energy generating facilities, are located, designed, and constructed to minimize adverse social, visual, and environmental impacts in the coastal zone management area; and
- (C) Direct the location and expansion of coastal dependent developments to areas presently designated and used for such developments and permit reasonable long-term growth at such areas, and permit coastal dependent development outside of presently designated areas when:
 - (i) Use of presently designated locations is not feasible;
 - (ii) Adverse environmental effects are minimized; and
 - (iii) The development is important to the State's economy.

Comment: In the short term, an estimated expenditure of approximately \$49 million during the anticipated 24-month construction period will confer some positive benefits to the local economy. This would include generating indirect sales of approximately \$48.0 million, for a total expenditure and sales of approximately \$97.0 million. An annual average of approximately 152 construction jobs and 206 support jobs would also be created, with average annual total earnings of \$14.5 million during the construction period. State and County Tax revenue associated with construction expenditures would be approximately \$5.0 million over the construction period.

The existing resort use is considered a coastal dependent development within Waikiki, where such resort use are appropriately concentrated under existing land use planning and zoning ordinances.

(6) Coastal Hazards

Objectives:

Reduce hazard to life and property from tsunami, storm waves, stream flooding, erosion, subsidence and pollution.

Policies

- (A) Develop and communicate adequate information about storm wave, tsunami, flood, erosion, subsidence, and point and nonpoint source pollution hazards;
- (B) Control development in areas subject to storm wave, tsunami, flood, erosion, hurricane, wind, subsidence, and point and nonpoint pollution hazards;

- (C) Ensure that developments comply with requirements of the Federal Flood Insurance Program;
- (D) Prevent coastal flooding from inland projects; and
- (E) Develop a coastal point and nonpoint source pollution control program.

Comment: The proposed improvements will comply with City flood ordinances, as discussed in Section 2.4, Flood Hazard.

(7) Managing Development

Objective:

Improve the development review process, communication and public participation in the management of coastal resource and hazards.

Policies:

- (A) Use, implement, and enforce existing law effectively to the maximum extent possible in managing present and future coastal zone development;
- (B) Facilitate timely processing of applications for development permits and resolve overlapping of conflicting permit requirements; and
- (C) Communicate the potential short and long-term impacts of proposed significant coastal developments early in their life cycle and in terms understandable to the public to facilitate public participation in the planning and review process.

Comment: Government agencies, organizations and the general public have been notified of the proposed project and given an opportunity to comment on the project through the environmental review process. The SMA Use Permit process will provide additional opportunities for agency and public input.

(8) Public Participation

Objective:

Stimulate public awareness, education, and participation in coastal management.

Policies:

- (A) Maintain a public advisory body to identify coastal management problems and to provide policy advice and assistance to the coastal zone management program;
- (B) Disseminate information on coastal management issues by means of educational materials, published reports, staff contact, and public workshops for persons and organizations concerned with coastal-related issues, developments, and government activities; and
- (C) Organize workshops, policy dialogues, and site-specific mediations to respond to coastal issues and conflicts.

Comment: This EA will be circulated to various government agencies, organizations, and individuals. The public participation objective will also be addressed during the processing of the SMA Use Permit, which will include public notification as well as a public hearing.

(9) <u>Beach Protection</u>

Objective:

Protect beaches for public use and recreation.

Policies:

- (A) Locate new structures inland from the shoreline setback to conserve open space and to minimize loss of improvements due to erosion;
- (B) Prohibit construction of private erosion-protection structures seaward of the shoreline, except when they result in improved aesthetic and engineering solutions to erosion at the sites and do not interfere with existing recreational and waterline activities; and
- (C) Minimize the construction of public erosion-protection structures seaward of the shoreline.

Comment: The proposed improvements do not involve the construction of new shoreline erosion-protection structures. An existing seawall is located along the shoreline fronting the Sheraton Waikiki. The concrete walkway atop the seawall provides public access along the shoreline during high tides, when waves reach the seawall.

(10) Marine Resources

Objective:

Promote the protection, use, and development of marine and coastal resources to assure their sustainability.

Policies:

- (A) Ensure that the use and development of marine and coastal resources are ecologically and environmentally sound and economically beneficial;
- (B) Coordinate the management of marine and coastal resources and activities management to improve effectiveness and efficiency;
- (C) Assert and articulate the interests of the State as a partner with federal agencies in the sound management of ocean resources within the United States exclusive economic zone:
- (D) Promote research, study, and understanding of ocean processes, marine life, and other ocean resources in order to acquire and inventory information necessary to understand how ocean development activities relate to and impact upon ocean and coastal resources; and
- (E) Encourage research and development of new, innovative technologies for exploring, using, or protecting marine and coastal resources.

Comment: The proposed action reflects an overall conservation ethic and practice of stewardship in the protection, use and development of coastal resources that are ecologically and environmentally sound and economically beneficial. This is discussed in comments to previous SMA policies regarding: (1) Recreational Resources; (2) Historic Resources; (3) Scenic Resources; (4) Coastal Ecosystem; (5) Economic Resources; and, (6) Beach Erosion.

3.2.4 Land Use Ordinance, Waikiki Special District

The project site is located within the WSD, which provides unique zoning precincts with associated land use and design standards that are generally more stringent that those applicable to the rest of Oahu. The District was established in 1976 to preserve and enhance the character of Waikiki, and to maintain a balance in Waikiki's mix of resort, commercial, residential, and recreational uses. In February 1996, the City Planning Department published the "Waikiki Planning and Program Guide" to provide an overview of recent efforts toward the continued improvement and enhancement of Waikiki. Among its recommendations were amendments to the WSD to promote renovation, replacement, and enhancement in the resort districts and to promote a Hawaiian sense of place and preserve views and unique Hawaiian features.

The project site lies within the WSD's Resort/Commercial Precinct (see Figure 10). The proposed project revitalizes an existing resort use, which is a "Permitted Principal Use" within that precinct.

3.2.5 Waikiki Special District Design Guidelines

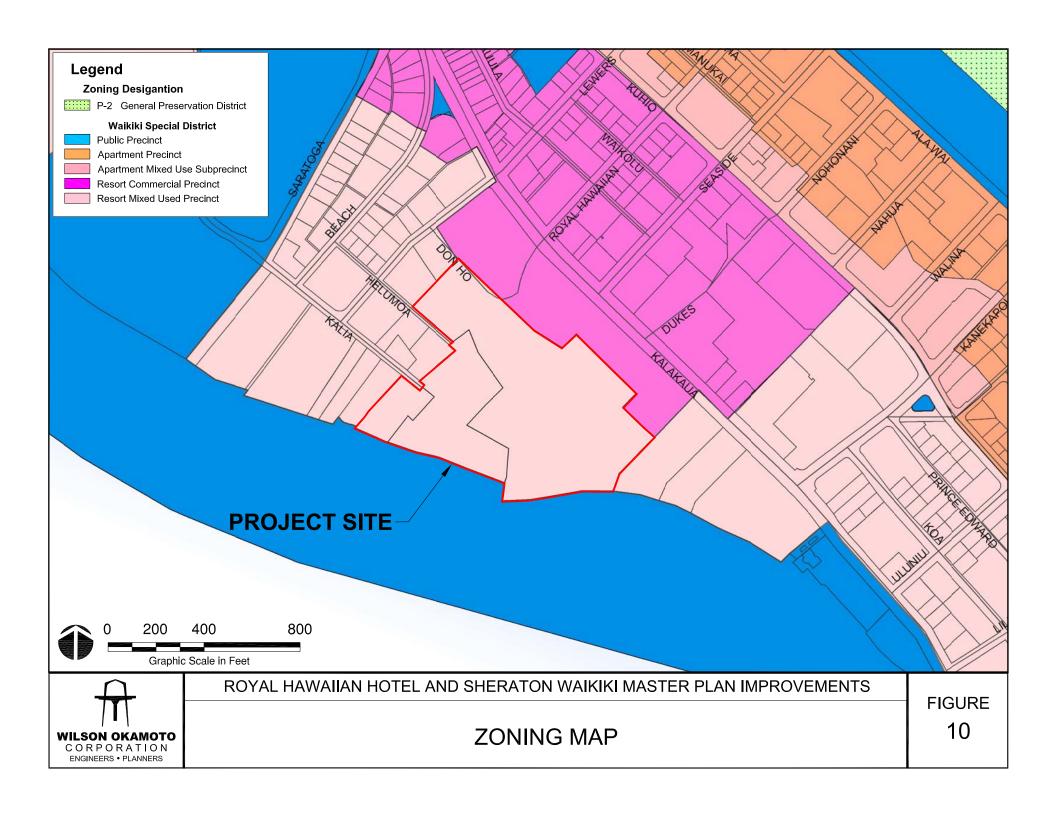
The Waikiki Special District (WSD) Design Guidelines is intended to guide the restoration and enhancement of a pedestrian-friendly environment. The guidelines suggest specific design elements which help impart a Hawaiian sense of place. Since both the Royal Hawaiian Hotel and Sheraton Waikiki were developed prior to the creation of the WSD, however, they are nonconforming with regard to various WSD design standards such as density, height setbacks, and coastal height setback. None of the proposed improvements will increase the degree of nonconformity. The proposed improvements will comply with the objectives enumerated in Section 9.80-1 of the City and County of Honolulu, Land Use Ordinance (LUO) as related to the enhancement of open space, lobbies and arcades, landscaping, and public pedestrian access. The project proposes the removal of 32 guestrooms and to upgrade hotel facilities. Public access will be maintained and pedestrian circulation within the property will be enhanced. Moreover, the proposed improvements are intended to incorporate features that will revitalize the existing resort to convey a greater Hawaiian sense of place consistent with the WSD design guidelines. Approval of a WSD-minor Permit(s) will be required to implement the proposed improvements.

3.2.6 Shoreline Setback Variance

Pursuant to Part 2 of DPP's Shoreline Rules and Regulations, Chapter 17, Relating to Shoreline Setbacks and the SMA, a SSV may be granted for "structures and activities" within the shoreline setback area, which is measured forty feet inland of the certified shoreline. The shoreline fronting the Sheraton Waikiki has been certified. Those components, or portions thereof, which are subject to the SSV, include a seaward portion of the resort pool and deck, the Sheraton Waikiki infinity edge pool and deck reconstruction, and the elevated exterior terraces adjacent to the existing Esprit Lounge. The improvements to the Royal Hawaiian Hotel pool and deck are

intended as repair and maintenance of deteriorated conditions and are thus exempt from SMA and SSV approvals. The Royal Hawaiian Hotel pool deck is proposed as an ADA enhancement since it will tie into the floor level of the Surf Room and as "preventative maintenance" to keep sand from encroaching onto the deck. These measures, which will enhance the safety and accessibility of this area, are thus considered a SSV exempt improvement. An application for a SSV for the proposed improvements on the shoreline, fronting the Sheraton Waikiki and Resort Pool will be submitted to DPP for processing and approval.

The proposed work at the Royal Hawaiian Hotel that could be in the shoreline setback area are a portion of the pool deck, interior improvements or exterior repair and maintenance, all of which are exempt from the SSV requirements.



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4. DETERMINATION OF FONSI

A. Applicant

Kyo-ya Hotels & Resorts, LP

B. Accepting Authority

City and County of Honolulu, Department of Planning and Permitting

C. Description of the Proposed Action

Renovation of two existing resort hotels consisting of exterior improvements to:

- Visitor arrival and registration areas;
- On-site vehicular and pedestrian circulation; and,
- Pool, garden and recreation areas.

In addition, interior improvements, which are exempt from the EA, but, which provide the context for a comprehensive overview to identify potential cumulative impacts, are also considered. These include reconfiguration of ground level interior areas including lobby, restaurant, and retail uses in both the Royal Hawaiian Hotel and Sheraton Waikiki. Reconfiguration of the lobby level of the Sheraton Waikiki will eliminate a total of 32 guest units in the Sheraton Waikiki. A new kitchen grease interceptor has been installed in the existing basement adjacent to the current Sheraton Waikiki loading dock.

The improvements are proposed to enhance the visitor arrival experience, including conveying a greater Hawaiian sense of place pursuant to the City's Waikiki Special District Guidelines, facilitate vehicular and pedestrian circulation and wayfinding, and provide visual linkages.

D. Determination and Reasons Supporting Determination

Potential impacts of the proposed project have been evaluated in accordance with the significance criteria of Section 11-200-12 of the Department of Health's Administrative Rules. Based on the findings of this Final EA, a Finding of No Significant Impact is appropriate as the proposed project will not:

(1) Involve an irrevocable commitment to loss or destruction of any natural or cultural resource

The project will renovate existing resort properties and will not involve an irrevocable commitment to, loss, or destruction of any natural or cultural resources. Appropriate measures will be taken to mitigate any impacts on existing trees, particularly coconut palms, which have a cultural association with the project site. A tree protection and preservation plan shall be implemented which describes the best practices for protecting trees during construction. An Archaeological Survey has been conducted pursuant to an SHPD-approved AIS plan. On going coordination will be maintained with SHPD, OIBC, OHA, and other interested parties regarding the archaeological inventory survey prior to construction and on-site archaeological monitoring will be provided during construction activities. Archaeological monitoring during any excavation into native soils not overlain by prior construction fill material will assure that any cultural materials encountered, including human burials are appropriately treated. This will include stopping work and reporting inadvertent finds to the SHPD. In the case of any human burials encountered,

further consultation will be pursued with the Oahu Island Burial Council and potential lineal and cultural descendants.

(2) Curtail the range of beneficial uses of the environment

The proposed project will not curtail the beneficial uses of the environment. The proposed project involves the renovation of an existing use that is consistent with State and County land use plans policies and controls.

(3) Conflict with the state's long-term environmental policies or goals and guidelines as expressed in Chapter 344, HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders

The proposed project does not conflict with long-term environmental policies, goals, and guidelines of the State of Hawaii. As presented in this EA, the project's potential temporary adverse impacts are associated only with short-term construction-related activities and can be mitigated through adherence to standard construction mitigation practices.

(4) Substantially affect the economic or social welfare of the community or state

The proposed project would provide short-term economic benefits in the form of construction jobs, and promote the long-term economic viability. The proposed project would also positively impact the social welfare of the region by enhancing an existing resort complex and the economic vibrance of Waikiki as a whole, consistent with the intent of the Waikiki Special District.

(5) Substantially affect public health

No impacts to the public's health and welfare are anticipated. The installation of the kitchen grease interceptor pursuant to State DOH requirements has a positive impact on public health and welfare.

(6) Involve substantial secondary impacts, such as population changes or effects on public facilities

The proposed project will not involve substantial secondary impacts, as it will essentially continue an existing resort use.

- (7) Involve a substantial degradation of environmental quality
 - Construction activities associated with the proposed project are anticipated to result in short-term impacts to noise levels, air quality, water quality, and traffic in the immediate project vicinity. With the incorporation of mitigation measures during the construction period, the project will not result in long-term degradation to the environmental quality.
- (8) Individually limited but cumulatively has considerable effect upon the environment or involves a commitment for larger actions
 - No cumulative effects are anticipated, inasmuch as the proposed project involves the continuation of an existing resort use consistent with land use plans, policies, and controls.
- (9) Substantially affect a rare, threatened, or endangered species, or its habitat

There are no known rare, threatened or endangered species of flora or fauna or associated habitat identified on the project site.

(10) Detrimentally affect air or water quality or ambient noise levels

Operation of construction equipment would temporarily elevate ambient noise and concentrations of exhaust emissions in the immediate vicinity of the project site. Operation of the proposed project will not significantly impact air or water quality or ambient noise levels in the vicinity over the long-term.

(11) Affect or is likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters

The proposed improvements will comply with City flood ordinances. No lowering of existing ground floor levels are proposed.

(12) Substantially affect scenic vistas and view planes identified in county or state plans or studies

The proposed project is intended to enhance the aesthetic character of an existing resort use complex consistent with the intent of the Waikiki Special District. None of the streets or locations in the vicinity of the project site are identified as major public view corridors.

(13) Require substantial energy consumption

Construction and operation of the project will not require substantial increases in energy consumption. All of the proposed improvements to the Royal Hawaiian Hotel and Sheraton Waikiki will be designed to comply with Chapter 344, HRS ("State Environmental Policy"), Chapter 226 ("Hawaii State Planning Act") and the State Model Energy Code, Chapter 32, ROH ("Building Energy Efficiency Standard"). Although a complete retrofitting of all structures on the property for energy conservation is not proposed at this time, significant gains in energy conservation will be achieved, particularly at the Royal Hawaiian Hotel, which has not had a major renovation since it was constructed in 1927.

In recent years, the following energy conservation measures, not covered in the Master Plan project, have improved energy efficiency. These measures include:

- Installing more energy efficient fan coil units in 1,482 guestrooms;
- Upgrading seven service and 11 guest elevator hoist systems;
- Installing compact fluorescent lamps (CFLs) in all guestrooms and in public areas;
- Installing in all guestrooms "smart" thermostats that utilize motion sensors and door contacts;
- Installing quick acting motion sensor lighting in all stairwells;
- Installing variable speed drivers on all major pumps and fans; and,
- Installing high efficiency motors on all major equipment.

In addition, the following measures conserve water and, consequently, reduce energy consumption for pumping water to achieve required pressure. Improvements undertaken prior to the current Master Plan include the installation of a total of 1,650 low-flush toilets (1.6-gallon) and the related reduction of blow down from the cooling tower high cycle system.

5. ALTERNATIVES TO THE PROPOSED ACTION

5.1 No Action Alternative

The no action alternative will forego implementation of the proposed improvement and will not achieve the objectives of renovating the Royal Hawaiian Hotel and Sheraton Waikiki resort properties. The objectives include: conveying a Hawaiian "sense of place" in the Royal Grounds Arrival Area for the benefit of guest and the general public, which can access this area. The proposed driveway improvements and modification of the tour bus (group arrival staging) area also have the potential to facilitate traffic flow and increase queuing within the project site. This will reduce the potential for queuing vehicles onto nearby streets. The other proposed improvements are intended to enhance the experience of the resort's guest, providing a better impression of Waikiki as a premier resort travel destination.

5.2 Alternative Design

In developing the proposed project, Kyo-ya invited several Hawaii architectural firms to submit and present their alternative ideas and concept for renovating the Royal Hawaiian Hotel and Sheraton Waikiki resort properties. The ideas ranged from more aggressive demolition of structures such as the Manor Wing and developing new buildings to superficial changes in landscaping and building façade improvements. The basic concept of the proposed project was selected by Kyo-ya and further refined in consultation with the project architect.

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6. PERMITS AND APPROVALS

The following is a list of permits and approvals, which may be required prior to construction of the proposed project:

6.1 State of Hawaii

Department of Health

- Noise Variance Permit
- National Pollutant Discharge Elimination System (NPDES) Notice of Intent for Construction Stormwater Activity
- NPDES Notice of Intent For Construction Dewatering Activity
- NPDES Notice of Intent For Hydrotesting Activity

Disabilities Communication and Access Board (DCAB)

• Review pursuant to the Americans with Disabilities Act Accessibility Guidelines (ADAAG)

6.2 City and County of Honolulu

Department of Environmental Services

Industrial Wastewater Discharge Permit

Department of Planning and Permitting

- Special Management Area Use Permit Major / Shoreline Setback Variance
- Waikiki Special District Minor Permit
- Waikiki Special District Minor Permit (Tree removal in conjunction with ongoing landscape maintenance)
- Grading Permit
- Excavation Permit
- Building Permit
- Electrical Permit
- Plumbing Permit
- Sidewalk/Driveway Work Permit

Department of Transportation Services

Street Usage Permit

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7. CONSULTATION

7.1 Parties Consulted During the Pre-EA Consultation Period

The following agencies and organizations were consulted during the pre-assessment consultation period of the Draft EA, and include presentations made to various organizations and potentially affected parties. Fifteen parties formally provided written comments. All written comments are reproduced herein.

Federal Agencies

U.S. Department of the Army, Engineering Division

U.S. Department of Agriculture – Natural Resources Conservation Service

State of Hawaii

Department of Land and Natural Resources (DLNR)

State Historic Preservation Division

Land Division

Department of Business, Economic Development and Tourism (DBEDT)

Office of Planning

Land Use Commission

Department of Health (DOH)

Environmental Planning Office

Office of Environmental Quality Control

Environmental Management Division

Office of Hawaiian Affairs

Oahu Island Burial Council

City and County of Honolulu

Department of Planning and Permitting

Department of Transportation Services

Department of Parks and Recreation

Fire Department

Police Department

Office of Waikiki Development

Waikiki Neighborhood Board (No. 9)

Land Owners

Kamehameha Schools

Mark A. Robinson Trust

Adjacent Property Owners

Kamehameha Schools

Queen Emma Foundation

Neighboring Uses

Halekulani Hotel / Parc Hotel Imperial Waikiki Resort Outrigger LAX, L.P.

Royal Hawaiian Shopping Center

Organizations/Individuals and Presentation Attendees

Council Chair Barbara Marshall (3rd District)

Councilmember Charles Djou (4th District)

Councilmember Rodney Tam (6th District)

Hawaii Hotel and Lodging Association

Hawaii Visitors and Convention Bureau

Lineal and Cultural Descendents

Marsha Weinert (State Tourism Liaison)

National Association of Industrial and Office Properties

Oahu Visitors Bureau

Oahu Island Burial Council

Outdoor Circle

Representative Tom Brower (23rd District)

Senator Gordon Trimble (12th District)

SMG Hawaii Convention Center

Surfrider Foundation

Waikiki Beach Boys

Waikiki Beach Concessionaires

Waikiki Business Improvement District Association

Waikiki Improvement Association

Waikiki Neighborhood Board

7.2 Parties Consulted During the Draft EA Review Period

The following agencies and interested parties will be consulted during the Draft EA review period. Parties commented (\checkmark), parties with significant ($\checkmark\checkmark$)

State of Hawaii

✓✓ Department of Business, Economic Development and Tourism (DBEDT)

Office of Planning

Energy, Resources & Technology Division

✓ Department of Health (DOH)

Environmental Health Administration

Noise, Radiation and Indoor Air Quality Branch

Environmental Management Division

Clean Air Branch

Clean Water Branch

✓ Office of Environmental Quality Control

Department of Hawaiian Home Lands

Department of Land and Natural Resources (DLNR)

State Historic Preservation Division

Land Division

Division of State Parks

Division of Forestry and Wildlife

- ✓ Engineering Division
- ✓ Department of Transportation
- √√ Office of Hawaiian Affairs

U.H. Environmental Center

Hawaii State Library (Waikiki-Kapahulu Branch)

City and County of Honolulu

✓ ✓ Board of Water Supply

Customer Services Department

- ✓✓ Department of Design and Construction
- ✓ Department of Emergency Management

Department of Emergency Services

Department of Environmental Services

- ✓ Department of Facility Maintenance
- ✓ Department of Parks and Recreation
- ✓ ✓ Department of Planning and Permitting

Land Use Permits Division

/ Planning Division

Site Development Division

Civil Engineering

✓ Wastewater

Department of Transportation Services

√ Fire Department

Mayor's Office

Municipal Reference and Records Center

Office of Economic Development – Waikiki

Office of Waikiki Development

- ✓ Police Department
- ✓ ✓ Waikiki Neighborhood Board (No. 9)

Elected Officials

Council Chair Barbara Marshall (3rd District)

Councilmember Charles Djou (4th District)

Councilmember Rodney Tam (6th District)

Representative Thomas Brower (23rd District)

Representative Scott Nishimoto (21st District)

Senator Gordon Trimble (12th District)

Land Owners

Kamehameha Schools Mark A. Robinson Trust

Adjacent Property Owners

Kamehameha Schools Queen Emma Foundation

Neighboring Uses

Halekulani Hotel / Parc Hotel Imperial Waikiki Resort Outrigger LAX, L.P. Royal Hawaiian Shopping Center

Individuals/Organizations

Construction Industry Legislative Organization

Hawaii Hotel and Lodging Association

✓✓ Hawaiian Electric Company, Inc.

Hawaii Visitors and Convention Bureau

✓ ✓ Historic Hawaii Foundation

Lineal and Cultural Descendents

Marsha Weinert (State Tourism Liaison)

Oahu Island Burial Council

Oahu Visitors Bureau

✓✓ Outdoor Circle

Sierra Club

Surfrider Foundation

Waikiki Business Improvement District

Waikiki Hawaiian Civic Club

Waikiki Improvement Association

EXHIBIT A

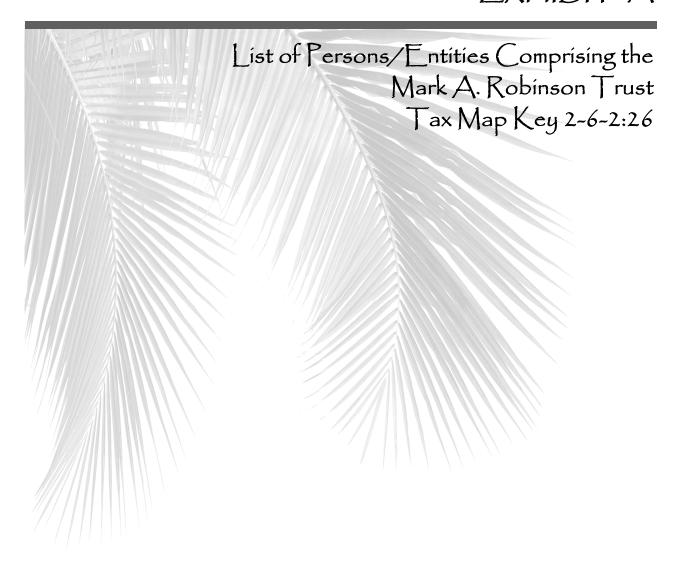


EXHIBIT B

Correspondence with State Historic Preservation Division and the Oahu Island Burial Council

EXHIBIT C

| Identified Re-interment Locations at the Royal Hawaiian Hotel Coconut Grove December 2007

EXHIBIT D

Letter to the State Historic Preservation Division Regarding Recommendations for Treatment of Isolate Human Remains November 19, 2007

Response Letter from the State Historic Preservation Division Regarding Recommendations for Treatment of Isolate Human Remains December 12, 2007

APPENDIX A

Sheraton / Royal Hawaiian Hotel Tree Survey Prepared by Steve Nimz and Associates, LLC. February 18, 2007

Map of Tree Survey Prepared by Walters Kimura Motoda Landscape Architects March 14, 2007

> Landscape Maintenance Program Plan (Tree Protection / Preservation Plan) • Royal Hawaiian Hotel Coconut Grove • Special Provisions (Coconut Grove) • Special Provisions (Porte-Cochere) Prepared by Steve Nimz and Associates, LLC December 17, 2007

APPENDIX B

Archaeological Literature Review and Field Check for Improvements to the Royal Hawaiian and Sheraton Hotels Waikiki, Kona District, Oahu TMK (1) 2-6-002:005, 026
Prepared by Cultural Surveys Hawaii, Inc.
April 2007

APPENDIX C

Archaeological Inventory Survey Plan for Improvements to the Royal Hawaiian and Sheraton Hotels Waikiki, Kona District, Oahu, TMK (1) 2-6-002:005, 026 Prepared by Cultural Surveys Hawaii May 2007

Archaeological Assessment Report for Improvements to the Royal Hawaiian and Sheraton Hotels Waikiki, Kona District, Oahu TMK (1) 2-6-002:005, 026
Prepared by Cultural Surveys Hawaii, Inc.
December 2007

APPENDIX D

Archaeological Monitoring Plan for Improvements to the Royal Hawaiian and Sheraton Hotels Waikiki, Kona District, Oahu TMK (1) 2-6-002:005, 026
Prepared by Cultural Surveys Hawaii, Inc.
December 2007

