DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
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AUG - 8 2019

KIRK CALDWELL
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ACTING DIRECTOR

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DEPUTY DIRECTOR

EUGENE H. TAKAHASHI
DEPUTY DIRECTOR

July 29, 2019 2019/ED-6(MS)

Mr. Scott Glenn, Director
State of Hawaii
Department of Health,
Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

Dear Mr. Glenn:

SUBJECT:	Chapter 25, Revised Ordinances of Honolulu Draft Environmental Assessment (DEA)
Project:	Turtle Bay Resort Renovation
Applicant:	BRE/ Turtle Bay Resort LLC
Agent:	Wilson Okamoto Corporation (Keola Cheng)
Location:	57-091 Kamehameha Highway - Koolauloa
Tax Map Keys:	5-6-003: 002, 003, 043, 054, 061 and 062; 5-7-001: 043, 046, 047, 052 to 056; and 5-7-006: 028 and 030

RECEIVED
'19 JUL 29 P3:20
OFC. OF ENVIRONMENTAL QUALITY CONTROL

With this letter, the Department of Planning and Permitting hereby transmits the DEA and anticipated finding of no significant impact (DEA-AFONSI) for the Turtle Bay Resort Renovation Project at 57-091 Kamehameha Highway, in the Koolauloa District (Tax Map Keys 5-6-003: 002, 003, 043, 054, 061 and 062; 5-7-001: 043, 046, 047, 052 to 056; and 5-7-006: 028 and 030) on the island of Oahu, for publication in the next edition of "*The Environmental Notice*" on **August 8, 2019**.

Enclosed, please find a completed publication form, and a hard copy and one electronic copy of the DEA. The Publication Form, including Project summary was also sent via electronic mail to your office.

20-033

Should you have any questions, please contact Malynne Simeon, of our staff, at 768-8023 or via email at msimeon@honolulu.gov.

Very truly yours,

for Kathy K. Sokugawa
Acting Director

Enclosure: Publication form
Hard copy of the DEA
Disc with copy of the DEA

APPLICANT
PUBLICATION FORM

Project Name:	Turtle Bay Resort Development
Project Short Name:	TBR Development
HRS §343-5 Trigger(s):	An Environmental Assessment is required by Revised Ordinance of Honolulu Section 25-3.3(c)(1) to be prepared in accordance with procedural steps set forth in Chapter 343, Hawai'i Revised Statutes and, therefore, also in accordance with Title 11, Chapter 200, Hawai'i Administrative Rules, Department of Health, State of Hawai'i.
Island(s):	Oahu
Judicial District(s):	Koolauloa
TMK(s):	(1) 5-6-003 002, 003, 043, 054, 061 and 062; 5-7-001: 043, 046, 047, 052, 053, 054, 055 and 056; 5-7-006: 028 and 030
Permit(s)/Approval(s):	**Federal**: Consultation Pursuant to the Endangered Species Act **State:** Chapter 6E, National Pollutant Discharge Elimination System, Disability and Communication Access Board, Pollution Control - Noise Permit, and Water quality. **City and County of Honolulu:** Special Management Area Permit, Flood Development Permit, Subdivision Approval, Shoreline Certification, Zoning Adjustment, Building Permit, Grading Permit/Trenching Permit, Certificate of Occupancy, Construction Dewatering, Wastewater Sewer Connection, Stormwater Drain Connection, Excavation and Repair of Streets and Sidewalks, Water Connection, Street Usage Permit, and Honolulu Fire Department Plan Review.
Approving Agency:	City and County of Honolulu
Contact Name, Email, Telephone, Address	Malynne Simeon, msimeon@honolulu.gov, (808) 768-8023, 650 South King Street, 7th Floor, Honolulu, Hawaii 96813
Applicant:	BRE/Turtle Bay Resort LLC
Contact Name, Email, Telephone, Address	Samatha Canon, scanon@tbrdevelopment.com, (808) 447-6958, 57-091 Kamehameha Hwy, Kahuku, Hawaii 96731
Consultant:	Wilson Okamoto Corporation
Contact Name, Email, Telephone, Address	Keola Cheng, KCheng@wilsonokamoto.com, (808) 946-2277, 1907 South Beretania Street, Suite 400, Honolulu, Hawaii 96818

Status (select one)	**Submittal Requirements**
__X__ DEA-AFNSI	Submit 1) the approving agency notice of determination/transmittal letter on agency letterhead, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the DEA, and 4) a searchable PDF of the DEA; a 30-day comment period follows from the date of publication in the Notice.
____ FEA-FONSI	Submit 1) the approving agency notice of determination/transmittal letter on agency letterhead, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the FEA, and 4) a searchable PDF of the FEA; no comment period follows from publication in the Notice.
____ FEA-EISPN	Submit 1) the approving agency notice of determination/transmittal letter on agency letterhead, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the FEA, and 4) a searchable PDF of the FEA; a 30-day comment period follows from the date of publication in the Notice.
____ Act 172-12 EISPN ("Direct to EIS")	Submit 1) the approving agency notice of determination letter on agency letterhead and 2) this completed OEQC publication form as a Word file; no EA is required and a 30-day comment period follows from the date of publication in the Notice.
____ DEIS	Submit 1) a transmittal letter to the OEQC and to the approving agency, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the DEIS, 4) a searchable PDF of the DEIS, and 5) a searchable PDF of the distribution list; a 45-day comment period follows from the date of publication in the Notice.
____ FEIS	Submit 1) a transmittal letter to the OEQC and to the approving agency, 2) this completed OEQC publication form as a Word file, 3) a hard copy of the FEIS, 4) a searchable PDF of the FEIS, and 5) a searchable PDF of the distribution list; no comment period follows from publication in the Notice.

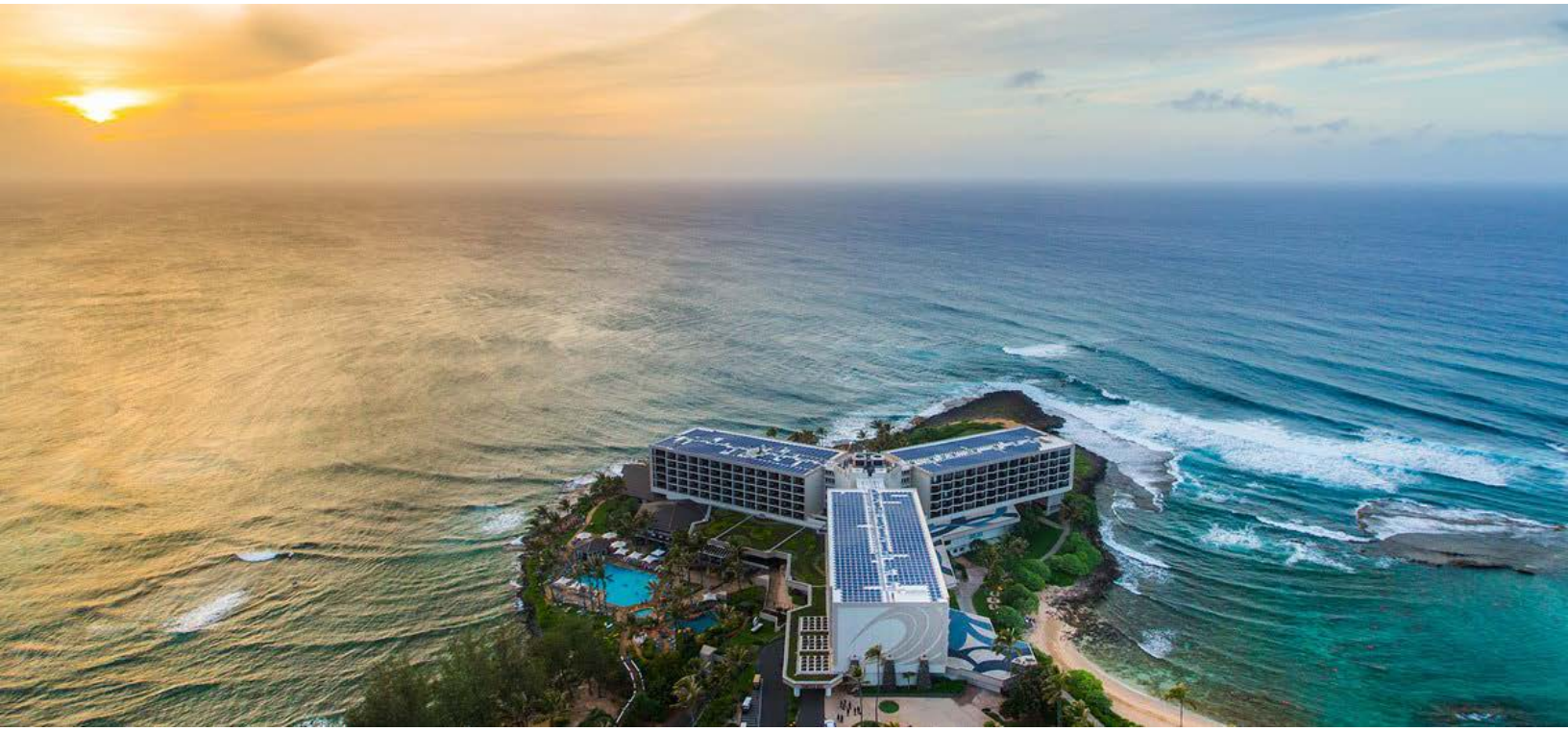
___ FEIS Acceptance Determination	The approving agency simultaneously transmits to both the OEQC and the applicant a letter of its determination of acceptance or nonacceptance (pursuant to Section 11-200-23, HAR) of the FEIS; no comment period ensues upon publication in the Notice.
____ FEIS Statutory Acceptance	The approving agency simultaneously transmits to both the OEQC and the applicant a notice that it did not make a timely determination on the acceptance or nonacceptance of the applicant's FEIS under Section 343-5(c), HRS, and therefore the applicant's FEIS is deemed accepted as a matter of law.
____ Supplemental EIS Determination	The approving agency simultaneously transmits its notice to both the applicant and the OEQC that it has reviewed (pursuant to Section 11-200-27, HAR) the previously accepted FEIS and determines that a supplemental EIS is or is not required; no EA is required and no comment period ensues upon publication in the Notice.
____ Withdrawal	Identify the specific document(s) to withdraw and explain in the project summary section.
____ Other	Contact the OEQC if your action is not one of the above items.

Project Summary

The Applicant is proposing renovations to the Turtle Bay Hotel that consist of: repairs to the main hotel building, interior and exterior improvements to the visitor arrival and registration areas, on-site vehicular and pedestrian circulation improvements, repair and reconfiguration of the pool and recreation areas, and maintenance of public shoreline access in compliance with land use entitlements. The Resort's beach cottages and support facilities will also be renovated.

Turtle Bay Resort Development

Draft Environmental Assessment



July 2019

Prepared For

BRE Turtle Bay Resort LLC

Prepared By

Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

Insert Authorization Letter Here

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PREFACE

This Draft Environmental Assessment (EA) / Anticipated Finding of No Significant Impact (FONSI) has been prepared in connection with an application for a Special Management Area (SMA) permit for the proposed project pursuant to Chapter 25, Revised Ordinances of Honolulu (ROH). Specifically, an EA is required by ROH Section 25-3.3(c)(1) to be prepared in accordance with procedural steps set forth in Chapter 343, Hawai'i Revised Statutes (HRS) and, therefore, also in accordance with Title 11, Chapter 200, Hawai'i Administrative Rules (HAR), Department of Health, State of Hawai'i.

The "Applicant" is collectively BRE Turtle Bay Resort LLC, a Delaware limited liability company, BRE Turtle Bay Development LLC, a Delaware limited liability company, BRE Turtle Bay Parcels LLC, a Delaware limited liability company, and BRE Turtle Bay Mauka Lands LLC, a Delaware limited liability company.The Applicant is proposing renovations to the Turtle Bay Hotel that consist of: repairs to the main hotel building, interior and exterior improvements to the visitor arrival and registration areas, on-site vehicular and pedestrian circulation improvements, repair and reconfiguration of the pool and recreation areas, and establishment of public shoreline accesses in compliance with land use entitlements. The Turtle Bay Hotel's beach cottages and support facilities will also be renovated. It is noted that establishing public shoreline accesses required by land use entitlements would require the approval of a subdivision application to subdivide and create necessary access easements.

The Project Site is situated within the City and County of Honolulu's SMA and the proposed renovations are valued over $500,000, which triggers the need to apply for an SMA Use Permit with a supporting EA, as discussed previously.

It is anticipated that a FONSI will be issued and filed with the State Office of Environmental Quality Control (OEQC) by the approving agency, the City and County of Honolulu Department of Planning and Permitting (DPP), following public review of the Draft EA.

DEFINITIONS

AMP: Archaeological Monitoring Plan.

Applicant: BRE Turtle Bay Resort LLC, a Delaware limited liability company, BRE Turtle Bay Development LLC, a Delaware limited liability company, BRE Turtle Bay Parcels LLC, a Delaware limited liability company, and BRE Turtle Bay Mauka Lands LLC, a Delaware limited liability company.

ASM: ASM Affiliates.

BMPs: Best Management Practices.

BTP: Burial Treatment Plan.

BWS: Board of Water Supply.

CDP: Census Designated Place.

CIA: Cultural Impact Assessment.

City: City and County of Honolulu

CZM: Coastal Zone Management.

DOE: State of Hawaii, Department of Education.

DOH: State of Hawaii, Department of Health.

DP: Development Plan.

DPP: City and County of Honolulu, Department of Planning and Permitting

DRP: Data Recovery Plan.

DTS: City and County of Honolulu, Department of Transportation Services.

EFH: Essential Fish Habitat.

EMS: City and County of Honolulu, Emergency Services Department, Emergency Medical Services Division

FEMA: Federal Emergency Management Agency.

FEPs: Fishery Ecosystem Plans.

FIRM: Flood Insurance Rate Map.

EA: Environmental Assessment

FONSI: Finding of No Significant Impact, as such term is used in HRS Chapter 343.

GHG: Greenhouse Gas.

Golf Courses: the two existing 18-hole golf courses known as the Palmer Course and the Fazio Course.

HAR: Hawaii Administrative Rules.

HECO: Hawaiian Electric Company.

HFD: City and County of Honolulu Fire Department.

HPD: City and County of Honolulu Police Department.

KEE: the independently owned condominium project known as the Kuilima Estates East, designated by TMK Nos. (1) 5-7-1: 027 and 028.

KEW: the independently owned condominium project known as the Kuilima Estates West, designated by TMK No. (1) 5-7-1: 029.

LCA: Land Commission Award.

LUO: Land Use Ordinance.

Makai: towards the ocean.

Mauka: towards the mountains.

Mauka Lands: the lands on the mauka side of Kamehameha Highway commonly referred to as the Turtle Bay Mauka Lands, and designated by TMK Nos. (1) 5-6-3:002, 003 and 043; 5-7-1: 003, 004, 005, 006, 021 and 03.

MUS: Management Unit Species.

NPDES: National Pollutant Discharge Elimination System.

Ocean Villas: the condominium project known as Ocean Villas at Turtle Bay Resort, and designated by TMK Nos. (1) 5-7-1:013, CPRs 1-57.

OEQC: Office of Environmental Quality Control.

PP: Preservation Plan

Project Area: the parcels upon which the Proposed Action will be implemented.

Proposed Action: Renovations to the Turtle Bay Hotel that consist of: repairs to the main hotel building, interior and exterior improvements to the visitor arrival and registration areas, on-site vehicular and pedestrian circulation improvements, repair and reconfiguration of the pool and recreation areas, and maintenance of public shoreline access in compliance with land use entitlements. The Turtle Bay Hotel's beach cottages and support facilities will also be renovated.

ROH: Revised Ordinances of Honolulu.

SAIS: Supplemental Archaeological Inventory Study, prepared in 2013 to support the SEIS.

SCP: Sustainable Communities Plan.

SEIS: Supplement Environmental Impact Statement for the Turtle Bay Resort Expansion, accepted by the DPP on October 3, 2013.

SHPD: Department of Land and Natural Resources, State Historic Preservation Division.

SIHP: State Inventory of Historic Places.

SMA: Special Management Area.

SMP: Special Management Area Use Permit.

State: State of Hawaii.

TBR: Turtle Bay Resort, which encompasses approximately 1,300 acres of both developed and undeveloped land roughly situated between Kawela Bay and Kahuku Point, on both the mauka and makai sides of Kamehameha Highway. The TBR includes properties owned by third parties, including the Ocean Villas, KEW and KEE, and the City and State.

Turtle Bay Hotel: the existing hotel within the TBR.

UBC: Uniform Building Code.

WWTP: the wastewater treatment facility situated on the mauka side of Kamehameha Highway on the parcel of land designated by TMK No. (1) 5-7-1:035.

SUMMARY

Applicant:	BRE Turtle Bay Resort LLC, a Delaware limited liability company; BRE Turtle Bay Development LLC, a Delaware limited liability company; BRE Turtle Bay Parcels LLC, a Delaware limited liability company; and BRE Turtle Bay Mauka Lands LLC, a Delaware limited liability company
Approving Agency:	City and County of Honolulu Department of Planning and Permitting (DPP)
Location:	Kahuku, Oʻahu, Hawaiʻi
Tax Map Keys (TMKs):	(1) 5-6-003:002, 003, 043, 054, 061 and 062; 5-7-001:043, 046, 047, 052, 053, 054, 055 and 056; 5-7-006:028 and 030
Recorded Fee Owner:	BRE Turtle Bay Resort LLC, a Delaware limited liability company; BRE Turtle Bay Development LLC, a Delaware limited liability company; BRE Turtle Bay Parcels LLC, a Delaware limited liability company; and BRE Turtle Bay Mauka Lands LLC, a Delaware limited liability company.
Existing Use:	The Turtle Bat Resort (TBR) includes both developed and undeveloped land roughly situated between Kawela Bay and Kahuku Point, makai and mauka of Kamehameha Highway (Route 83). Existing developments within TBR include the Turtle Bay Hotel, adjacent beach cottages, the nearby Ocean Villas, two golf courses (Fazio Course and Palmer Course), Kuilima Estates East, Kuilima Estates West, and other resort amenities.
State Land Use Classification:	Urban
County Zoning Designation:	According to the DPP, the project area lies within the City and County of Honolulu's Resort, Business (B-1), Preservation (P-1 & P-2), and Agriculture (A-2) Zoning Designations.
Proposed Action:	The Applicant is proposing renovations to the Turtle Bay Hotel that consist of: repairs to the main hotel building, interior and exterior improvements to the visitor arrival and registration areas, on-site vehicular and pedestrian circulation improvements, repair and reconfiguration of the pool and recreation areas, and maintenance of public shoreline access in compliance with land use entitlements. The beach cottages and support facilities will also be renovated.

Impacts:

Potential soil erosion and associated water quality impacts will be mitigated by applying required best management practices to control soil erosion and siltation. No significant impacts on flora and fauna are anticipated as a result of construction or operation of the project. No historic properties will be affected by the proposed project. Air quality, noise and hazardous materials impacts will be mitigated by compliance with applicable Department of Health rules. Long-term traffic operations in the vicinity of the project site are expected to remain similar to conditions without the proposed project. Construction activities, specifically those centering on work to the Porte Cochere would involve closure of arrival entrance which could potentially contribute to area traffic in the short term. Nonetheless, the proposed project is not expected to have a significant overall impact on surrounding roadways. No significant impacts regarding water, wastewater, drainage, electrical and communications systems are anticipated. Further consultation and coordination with applicable agencies will assure that construction activities can avoid impacts to existing utility lines.

Anticipated Determination:

Finding of No Significant Impact (FONSI)

Parties Consulted During Pre-Assessment:

Federal Agencies

U.S. Environmental Protection Agency
U.S. Army Corps of Engineers
U.S. Department of the Interior, Fish and Wildlife Service

State Agencies

Department of Accounting and General Services
Department of Business, Economic Development and Tourism
Department of Business, Economic Development and Tourism, Land Use Commission
Department of Business, Economic Development and Tourism, Office of Planning
Department of Hawaiian Home Lands
Department of Health
Department of Health, Clean Water Branch
Department of Health, Environmental Management Division
Department of Health, Hazard Evaluation and Emergency Response Office
Department of Land and Natural Resources
Department of Land and Natural Resources, Office of Conservation and Coastal Lands

Department of Land and Natural Resources, State Historic Preservation Division
Department of Transportation
Office of Environmental Quality Control
Office of Hawaiian Affairs

City Council
Council Chair Ann Kobayashi
Council Member Heidi Tsuneyoshi, District 2

City and County of Honolulu Agencies
Board of Water Supply
Department of Community Services
Department of Design and Construction
Department of Environmental Services
Department of Facility Maintenance
Department of Parks and Recreation
Department of Planning and Permitting
Department of Transportation Services
Honolulu Fire Department
Honolulu Police Department

Utility Companies
Hawai'i Gas
Spectrum Hawai'i
Hawaiian Telcom
Hawaiian Electric Company

Other Interested Parties and Individuals
Mayor Kirk Caldwell
North Shore Neighborhood Board No. 27
Hawai'i Tourism Authority

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1. INTRODUCTION

1.1 Project Location

The Turtle Bay Resort (TBR), which is comprised of multiple different properties, encompasses approximately 1,300 acres of land that includes both developed and undeveloped land roughly situated between Kawela Bay and Kahuku Point *makai* (towards the ocean) and *mauka* (towards the mountains) of Kamehameha Highway. TBR is situated at the northern most point of the island of O'ahu in Kahuku (See Figure 1-1), and is comprised of the TMKs outlined in Table 1-1, below.

Table 1-1 TBR Tax Map Keys

Owner	TMK	Area (Acreage)
BRE Turtle Bay Parcels LLC	5-7-006-024	4.936
City	5-7-006-025	7.049
State	5-7-006-026	31.367
State	5-7-006-027	21.161
BRE Turtle Bay Resort LLC	5-7-006-028	2.604
BRE Turtle Bay Development LLC	5-7-006-029	9.831
BRE Turtle Bay Resort LLC	5-7-006-030	9.103
BRE Turtle Bay Resort LLC	5-7-001-043	50.766
BRE Turtle Bay Development LLC	5-7-001-044	28.773
BRE Turtle Bay Development LLC	5-7-001-045	11.133
BRE Turtle Bay Resort LLC	5-7-001-046	29.605
BRE Turtle Bay Development LLC	5-7-001-047	1.454
BRE Turtle Bay Development LLC	5-7-001-048	23.040
BRE Turtle Bay Resort LLC	5-7-001-049	9.351
BRE Turtle Bay Development LLC	5-7-001-050	33.0656
BRE Turtle Bay Development LLC	5-7-001-051	3.371
BRE Turtle Bay Parcels LLC	5-6-003-054	37.412
BRE Turtle Bay Resort LLC	5-6-003-055	25.683
BRE Turtle Bay Development LLC	5-6-003-056	29.326
BRE Turtle Bay Resort LLC	5-6-003-057	3.783
BRE Turtle Bay Resort LLC	5-6-003-058	12.053
BRE Turtle Bay Resort LLC	5-6-003-059	75.208
BRE Turtle Bay Resort LLC	5-6-003-060	99.910
BRE Turtle Bay Resort LLC	5-6-003-061	8.774
BRE Turtle Bay Resort LLC	5-6-003-062	157.885

Owner	TMK	Area (Acreage)
BRE Turtle Bay Resort LLC	5-7-001-052	69.072
BRE Turtle Bay Parcels LLC	5-7-001-053	3.530
City	5-7-006- (por.) 031	0.235
City	5-7-006- (por.) 031	0.358
BRE Turtle Bay Parcels LLC	5-7-006-(por.) 031	0.447
BRE Turtle Bay Parcels LLC	5-7-001-(por.) 054	0.349
BRE Turtle Bay Parcels LLC	5-7-001-(por.) 054	0.370
State	5-7-001- (por.) 054	0.047
Ocean Villas (Individually owned condominium units)	5-7-001-013	4.594
KEE (Individually owned condominium units)	5-7-001-027 5-7-001-028	14.865 0.616
KEW (Individually owned condominium units)	5-7-001-029	17.574
BRE Turtle Bay Resort LLC	5-6-003-050	7.260
BRE Turtle Bay Mauka Lands LLC	5-6-003-002	0.142
BRE Turtle Bay Mauka Lands LLC	5-6-003-003	0.011
BRE Turtle Bay Mauka Lands LLC	5-6-003-043	2.0
BRE Turtle Bay Mauka Lands LLC	5-7-001-005	0.052
BRE Turtle Bay Mauka Lands LLC	5-7-001-021	468.087
BRE Turtle Bay Mauka Lands LLC	5-7-001-034	0.083
BRE Turtle Bay Mauka Lands LLC	5-7-001-003	0.206
BRE Turtle Bay Mauka Lands LLC	5-7-001-004	0.130
BRE Turtle Bay Mauka Lands LLC	5-7-001-006	0.180
BRE Turtle Bay Wastewater LLC	5-7-001-035	20.505

TBR is located on lands that can generally be described as a broad coastal plain extending seaward from the foothills that constitute the northern terminus of the Koʻolau mountain range. TBR properties are situated in portions of six *ahupuaʻa* (in order from west to east): ʻŌpana, Kawela, Hanakaʻoe, ʻUlulpehupehu, Punalau, and Kahuku in the *moku* of Koʻolauloa. TBR is located at the far western end of the Koʻolau Loa Sustainable Communities Plan area. To the east of TBR, the nearest communities are Kahuku Village, Lāʻie, and Hauʻula. To the west, the nearest communities are Sunset Beach, Pūpūkea, and Haleʻiwa. TBR is located approximately 43 miles from Honolulu (via the shortest route across the Central Oʻahu plateau).

Three (3) bays generally front the TBR, which extends from Kawela Stream east to Marconi Road: Kawela Bay to the west, Turtle Bay in the center, and Kuilima Bay (sometimes called Kaihalulu Bay) to the east. Kawela Point separates Kawela Bay from Turtle Bay. Kuilima Point separates Turtle Bay from Kuilima Bay and is the location of the existing Turtle Bay Hotel. Kahuku Point marks the eastern end of Kuilima Bay. The shoreline to the southeast of Kahuku Point is known as Hanakaʻīlio Beach and extends just over a mile to Kalaeuila Point, which is situated a few hundred feet to the east of the TBR's eastern property boundary.

Of the 1,300 acre TBR, the subject project area encompasses approximately 375 acres identified by the Tax Map Key (TMK) parcels owned by BRE, listed below in Table 1-2 (See Figure 1-2). It should be noted the bulk of improvements proposed are centralized to the footprint of the existing Turtle Bay Hotel which is situated on TMK Parcel 5-7-001:046.

Table 1-2 Project Area Tax Map Keys

TMK	Area (Acreage)
5-6-003:002	0.14
5-6-003:003	0.01
5-6-003:043	2.00
5-6-003:054	37.03
5-6-003:061	8.77
5-6-003:062	157.89
5-7-001:043	50.77
5-7-001:046	29.10
5-7-001:047	1.45
5-7-001:052	68.07
5-7-001:053	3.53
5-7-001:054	1.12
5-7-001:055	10.82
5-7-001:056	0.31
5-7-006:028	2.60
5-7-006:030	9.10

1.2 Existing Uses

Roadway access to TBR and the project area is served by Kamehameha Highway. Kuilima Drive provides access to the existing developments within the TBR. It is a privately owned and maintained four-lane, two-way divided roadway that intersects Kamehameha Highway at a stop sign controlled T-intersection. Kuilima Drive is a part of the proposed infrastructure improvements at TBR.

Currently, the existing developments on the property include the Turtle Bay Hotel, adjacent beach cottages, the nearby Ocean Villas, two golf courses (George Fazio Course and Arnold Palmer Course), retail, restaurants, resort amenities, and the Kuilima Estates East and Kuilima Estates West. The Ocean Villas includes 57 units, and together, the Kuilima Estates East and Kuilima Estates West include 368 units in multiple one and two story structures. The Ocean Villas, Kuilima Estates East, and Kuilima Estates West are independently owned, fee simple condominium

projects. The three properties, in addition to the common areas, parking lots, sidewalks, and accessory uses associated with them are not owned or controlled by Applicant.

The existing Turtle Bay Hotel consists of a main structure that includes 410 guest rooms, banquet rooms, meeting rooms, a wedding chapel, retail, restaurants, and other commercial support services; swimming pools; 42 beach cottage units; hotel parking; tennis courts; public beach access; and accessory uses.

The most recent renovations to the Turtle Bay Hotel were carried out between 2012 – 2014. The scope of that effort included renovations to the lobby, food and beverage establishments, guestrooms, main pool, pool bar, cottages, and to various landscape around the property. The cart barn was also repaired after a fire that occurred in 2015.

1.3 Surrounding Uses

TBR is situated along the northern coastline of O‘ahu that can generally be described as predominately a rural area. Mauka of TBR, approximately one-quarter mile south of the main entrance to the resort at Kuilima Drive, is the Turtle Bay Wastewater Treatment Plant (WWTP) that collects and treats wastewater from the existing TBR development. The WWTP is owned by BRE Turtle Bay Wastewater, LLC, an affiliate of Applicant, and is operated by Aqua Engineers, a third party Federal and State certified Wastewater Treatment Operator as a public utility regulated by the Public Utilities Commission. The WWTP is situated within the Mauka Lands. Punaho‘olapa Marsh is located makai of Kamehameha Highway, and the James Campbell National Wildlife Refuge is located approximately two miles to the east of TBR.

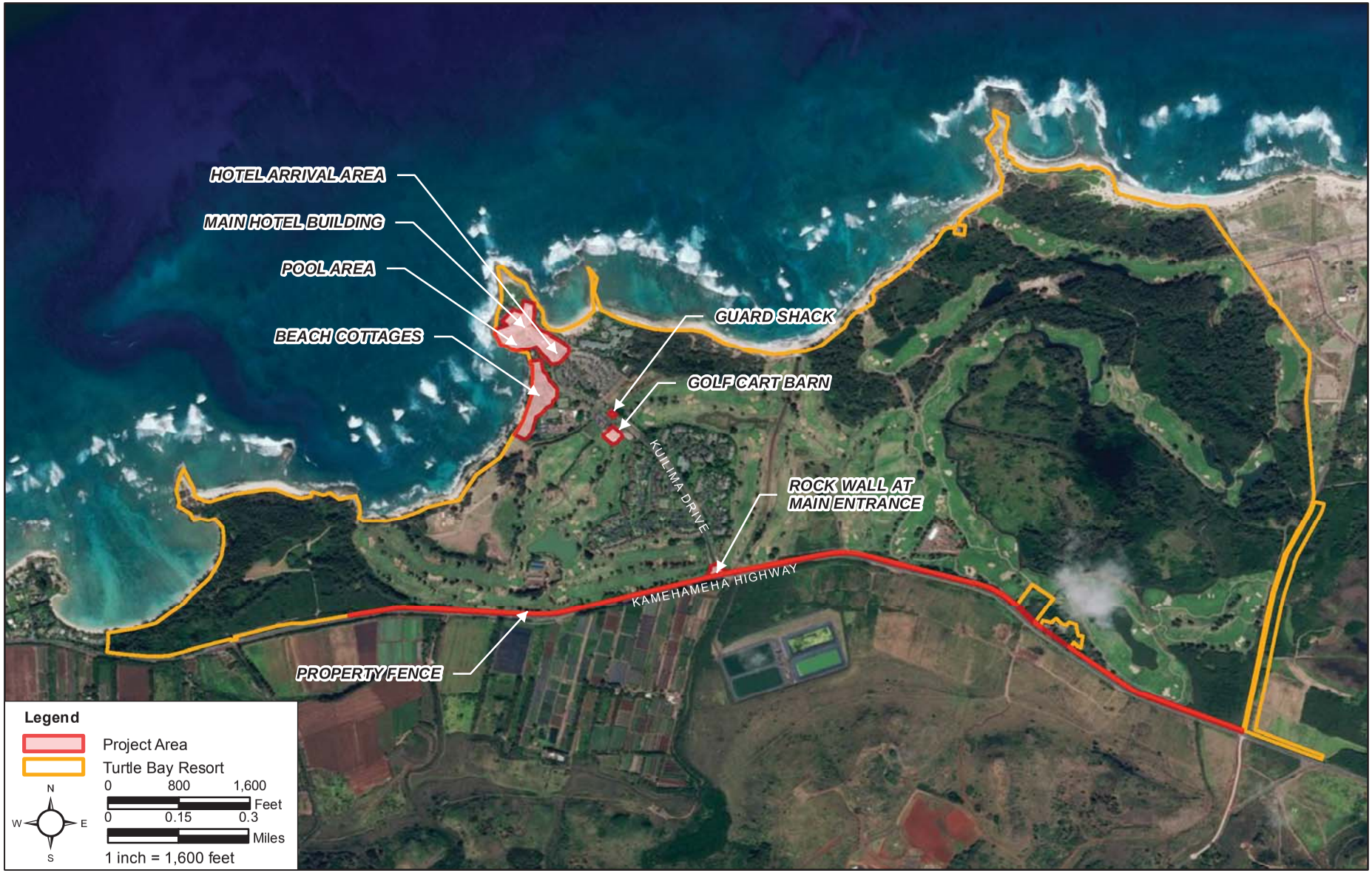

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FIGURE 1-1
LOCATION MAP

TURTLE BAY RESORT HOTEL RENOVATION
KAHUKU, O'AHU, HAWAI'I

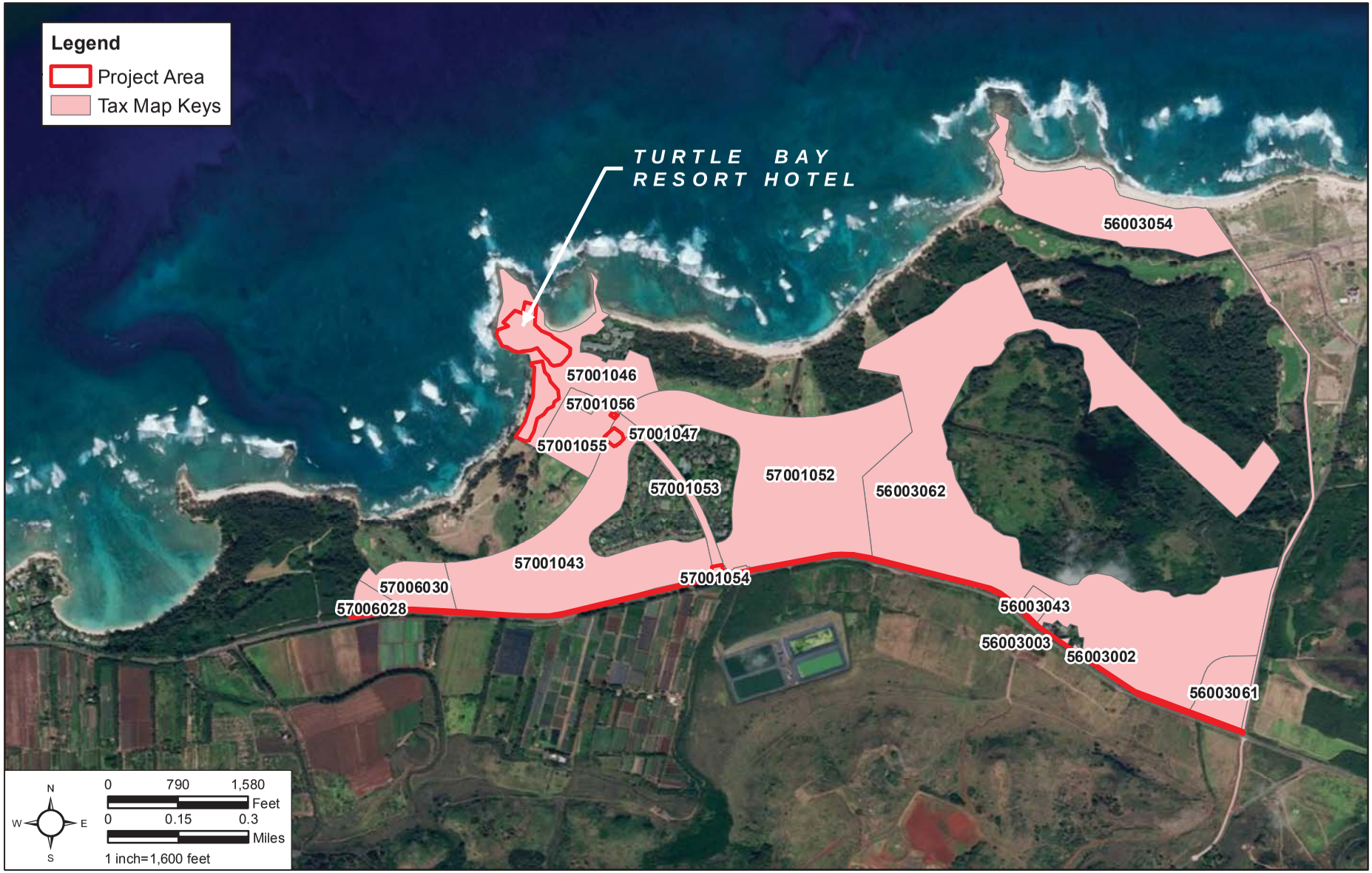

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FIGURE 1-2
TAX MAP KEY MAP

TURTLE BAY RESORT HOTEL RENOVATION
KAHUKU, O'AHU, HAWAI'I

2. PROJECT DESCRIPTION

2.1 Purpose and Need

The Proposed Action encompasses a range of much needed repairs and maintenance to the existing Turtle Bay Hotel and various facilities that support the hotel operations. The proposed repair and maintenance work is intended to maintain the range and quality of resort amenities and enhance the overall guest experience at TBR. Moreover, the context and character of the Proposed Action are consistent with land use plans, policies, and controls and would not be detrimental to the overall appearance or aesthetics of the surrounding region.

The Proposed Action is intended to maintain and enhance the economic and market viability of TBR, and will serve to promote an optimal balance of economic, social, and cultural vitality at the resort while maintaining the rural and scenic character of the coastline for the enjoyment of the guests and community at large.

The Proposed Action will allow TBR to continue to operate as an economically sustainable resort and both preserve and enhance the direct and indirect employment opportunities as well as immediate and long-term economic benefits associated with its operation to the North Shore community, the island of O‘ahu, and the State of Hawai‘i.

2.2 Project Description

The Proposed Action is expected to start during Quarter 4 of 2019. Expected to take 18 to 24 months to complete, the project consists of a refreshing of the existing development. The Applicant is proposing various renovations at the Turtle Bay Hotel and nearby cottages that consist of interior and exterior improvements to the existing Turtle Bay Hotel and its ancillary facilities to maintain the range and quality of amenities and enhance the overall guest experience at the TBR.

Improvements associated with the Proposed Action include a significant redesign and relocation of the porte cochere to its original 1970’s location that will increase arrival efficiency and centralize the hotel entry. The lobby will be redesigned to maximize intimacy and open a partial panoramic view that overlooks both Turtle Bay and Kuilima Bay with the check-in desk itself moving to overlook Kuilima Cove. The lobby will be renovated to house a new marketplace and coffee bar. A central bar overlooking the Turtle Bay Hotel towards the surf will serve as a new focal point for the lobby.

Existing Beach Cottages and hotel tower guestrooms will be renovated to help elevate the design throughout the TBR for an all new guest experience.

The existing food and beverage outlets, Kula Grille and Pa‘akai, in the Turtle Bay Hotel will also be significantly upgraded. The glass curtain walls at both restaurants will open to the elements allowing for a better indoor-outdoor experience. The existing pool bar will also be renovated. Other public area changes include a new reflecting pond at the hotel lobby and terraced outdoor lounge seating areas, which will overlook the newly designed adult pool complete with infinity edge. Plans also include the addition of a redesign on the existing family and keiki pools, complete with new water features and slide. A new surfboard rental, ocean safety education and retail outlet will be designed and integrated to the lobby-level overlooking the resort pools toward Turtle Bay. A new path from this retail spot will allow access directly to the pool level and public beach access.

The current tennis area will also be renovated. Two existing tennis courts will be repaired and two existing courts will be converted into six new pickle-ball courts. Artistic renderings of the proposed renovations prepared by the project architect are included herein as Appendix B.

Resort-wide landscape improvements will be implemented throughout the resort to help with a more focused vegetation palette and overall rebrand of the resort. Road and utility upgrades are also being implemented.

Generally speaking, the proposed project will not expand development beyond the existing footprint of the Turtle Bay Hotel. Nonetheless, minimal work along Kuilima Drive and Kamehameha Highway outside of the footprint of the existing Turtle Bay Hotel will be required. The Applicant proposes the following additional improvements to the Turtle Bay Hotel and its ancillary facilities which constitute "development" pursuant to Chapter 25, Revised Ordinances of Honolulu (ROH), and are subject to the Shoreline Management Area (SMA) permit requirements:

Hotel Improvements

- A new porte cochere structure will be constructed at the front of the main hotel building, which will serve as the new arrival entry. It will create vestibule at a more intimate scale, and will be composed of screens and wood that would help add texture and warmth to arrival, and pitched roofs at base and roof that would help soften the main hotel building's sense of mass.
- Windscreen fins measuring 10 to 14 feet high by 3 feet wide will be placed along either side of the new porte cochere. These fins will stand upright spaced for a distance of approximately 70 feet to decrease the impact of the wind on guests in the hotel arrival area.
- The existing slide pool will be replaced with a new adult/keiki pool located in front of the reflecting pool and garden beside the lobby of the main hotel building.
- A reflecting pond extending beyond the roof line and a garden consisting of exterior landscape, hardscape and planter boxes will be placed beside the lobby.
- A new linear pool will be constructed and situated behind existing beach cottages outside of the shoreline setback.
- New trellis at the entry lanais of the beach cottages will be added to provide human scale aesthetics.

Golf Improvements

- The existing cart barn will be extended to accommodate additional golf carts. The expansion will be 90 feet by 34 feet wide.

Resort Entrance / Façade Improvements

- The existing rock wall at the main entrance of the resort at Kuilima Drive and Kamehameha Highway intersection will be modified.
- The existing guard shack on Kuilima Drive will be demolished and replaced by new decorative rock wall and landscaping. In conjunction with this effort, the narrowing of Kuilima Drive from the Guard Shack to arrival entry at the Turtle Bay Hotel is also being considered.
- The existing chain link fence bordering the property along Kamehameha Highway will be replaced with a new fence and / or landscaped hedge. Rock pedestals (ahu) about 4 to 5 feet high will be placed at each historical ahupua'a boundary line.

2.3 Special Management Area Compliance

Certain elements of the proposed project will require approval of a SMA Use Permit (SMP) by the City and County of Honolulu Department of Planning and Permitting (DPP) as several of the proposed improvements constitute some level of "development" within the SMA as defined in Chapter 25, ROH, while several of the proposed improvements are not "development" and are thus exempt and do not require an SMP. This Environmental Assessment (EA) is being prepared in support of the forthcoming SMP application required for the implementation of the certain elements of the project pursuant to ROH Section 25-3.3(c)(1) and in accordance with Chapter 343, Hawai'i Revised Statutes (HRS) and Title 11, Chapter 200, Hawai'i Administrative Rules (HAR), Department of Health, State of Hawai'i.

The improvements listed above in Section 2.2 constitute "development" pursuant to Chapter 25, ROH, and are subject to SMA permit requirements. The SMA exempt / non-exempt status of the improvements associated with the proposed action is further detailed in documentation provided herein as Appendix C.

2.4 Development Schedule

The proposed repair and maintenance work is scheduled to commence in Q4 of 2019, and will be completed in Q3 of 2021.

2.5 Project Costs

Proposed repair and maintenance work is estimated at approximately $116 Million ($26 Million Non-SMA Exempt, $90 Million SMA Exempt).

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3. DESCRIPTION OF EXISTING ENVIRONMENT, IMPACTS, AND MITIGATION MEASURES

3.1 Climate

O‘ahu’s climate is relatively moderate throughout most of the year and is characterized as semi-tropical with two seasons. The summer period runs from May through September and is generally warm and dry, with predominantly northeast trade winds. In contrast, the winter season runs from October through April and is associated with lower temperatures, higher rainfall, and less prevalent trade winds.

The project is located in Kahuku which has a mild climate with average year-round temperatures ranging from 71 to 79 degrees. Rainfall in the area varies from 30 to 40 inches along the coast and 40 to 60 inches per year in the inland areas, with rainfall occurring mostly between October and March.

The State of Hawai‘i is being impacted by a myriad of climatic changes through rising sea levels, an increase in ocean acidity, changing rainfall patterns, a decrease in stream base flow, changing wind and wave patterns, and changing habitats and species distribution. There is no consensus, however, about the exact nature, magnitude, and timing of how these changes will occur. Generally speaking, there is an expectation of a rise in air and sea surface temperatures, a decrease in the prevailing northeasterly trade winds, a decline in average rainfall resulting in the continued decline in stream base flow, an increase in ocean acidity, and sea level rise. There is an overall consensus that these climate changes are linked to global greenhouse gas (GHG) emissions from anthropogenic sources.

GHGs absorb and “trap” solar radiation instead of reflecting it back into space. Generally speaking, GHGs include carbon dioxide, methane, nitrous oxide, and chlorofluorocarbons. The main sources of GHG emissions resulting from human activity are from the following sectors, in order from most emissions to least: fossil fuel power stations, industrial activity, transportation, agriculture, fossil fuel processing, residential and commercial activity, land use and biomass burning, and waste disposal and treatment. In 2007, the United States was responsible for approximately 20 percent of global carbon dioxide emissions (WRI 2010). Within Hawai‘i, the island of O‘ahu accounts for approximately 80 percent of the state’s total carbon dioxide emissions (ICF 2008). Hawai‘i’s GHG emissions encompass less than 1 percent of the national total, as of 2007 (Environmental Protection Agency [EPA] 2008).

Impacts and Mitigation Measures

No significant impacts on climate in the project area are anticipated. Construction and operation of proposed improvements are not anticipated to affect temperatures, wind, or rainfall levels in the project area.

The exact nature of how the climate will change is unknown. New information will continually need to be incorporated within future assessments to identify where efforts should be focused when developing adaptation strategies to climatic changes.

The implementation of the proposed action will result in the short-term irrevocable release of GHGs from construction activities associated with the development of the proposed improvements. The quantities of GHGs released, however, will be negligible. No mitigation is required or proposed.

3.2 Physiography

3.2.1 Geology and Topography

The island of O‘ahu is a volcanic doublet formed by the Wai‘anae Range to the west and the younger Ko‘olau Range to the east. Both are remnants of shield volcanoes, but the term “range” indicates that they have lost most of their original shield outlines and are now long, narrow ridges shaped largely by erosion. Later post-erosional eruptions sent lava down the valleys and resulted in the formation of volcanic cones such as Diamond Head and Tantalus.

The underlying bedrock on the TBR property was formed by lava deposited 1.7 to 2.5 million years ago from Ko‘olau Volcano. The Kahuku Plain is composed of an uplifted fossilized limestone reef formed underwater on the volcanic substratum during inter-glacial periods of higher sea level in the Pleistocene 12,000 to 2,500,000 years ago (Macdonald *et. al.*, 1983). Sea level reduction coupled with island uplifting following the Holocene period exposed the reef bench to high-intensity waves that eroded the reef surface and created the existing sand dunes along the shore.

The emerged limestone reef surface was eroded by waves and freshwater flows that created karstic features consisting of sinkholes, subterranean streams, fissures and caverns. The karst topography resulted in pools, ponds and marshes inland of the coastal dune field on the nearly level Kahuku Plain. Small areas of limestone outcrop are still visible mauka of Kawela Bay and Kuilima Point. Ground surface weathering also modified the limestone reef surface after the sea level receded. Accelerated weathering combined with alluvial deposition of sediments and rock derived from the volcanic uplands covered the Kahukui Plain’s limestone surface with a mantel of silt and clay sediments. Talus and alluvial deposits are interbedded, bordered along the coast by wind and wave deposited sands, especially at Kahuku Point where extensive relict and modern dunes are present and lithified clay (laterite) covers the marine bench mauka of the shore.

The north shore of O‘ahu is exposed to the full force of the North Pacific Swell in the winters, whose massive waves move large quantities of sand to the shore. Beach sands are calcareous (calcium-rich) and coarse-grained, typical of high-energy waves that move detritus from submerged reefs to shore. Active dunes at Kahuku Point are located makai of vegetated dunes and are continuously reshaped by the persistent trade winds.

TBR is comprised of *makai* and *kula* lands of Ahupua‘a O ‘Ōpana-Kawela and Ahupua‘a O Hanakaoe and a portion of the makai lands of Ahupua‘a O Kahuku located on a broad, low-lying coastal plain at the north end of the Island of O‘ahu. The land is generally level, with the terrain sloping gently to the north towards the shoreline. Elevation rises from sea level at the coast to a maximum of 40 feet at the southeast corner of the property, extending one-quarter mile to just over a mile inland. Some dunes at the coast rise 20 feet above mean sea level, however the vast majority of the site is between 5 and 10 feet above sea level. Except for a barely noticeable rise in the extreme southeast corner of the site, the only topographic relief is provided by sand dunes along the shoreline (See Figure 3-1).

Impacts and Mitigation Measures

In the short- and long-term, no significant impacts on geology or topography are anticipated during construction or operation of the proposed action. Construction of proposed action will not involve any major land disturbing activities involving mass grading or significant revisions to site contours. Applicable best management practices and erosion control measures will be implemented.

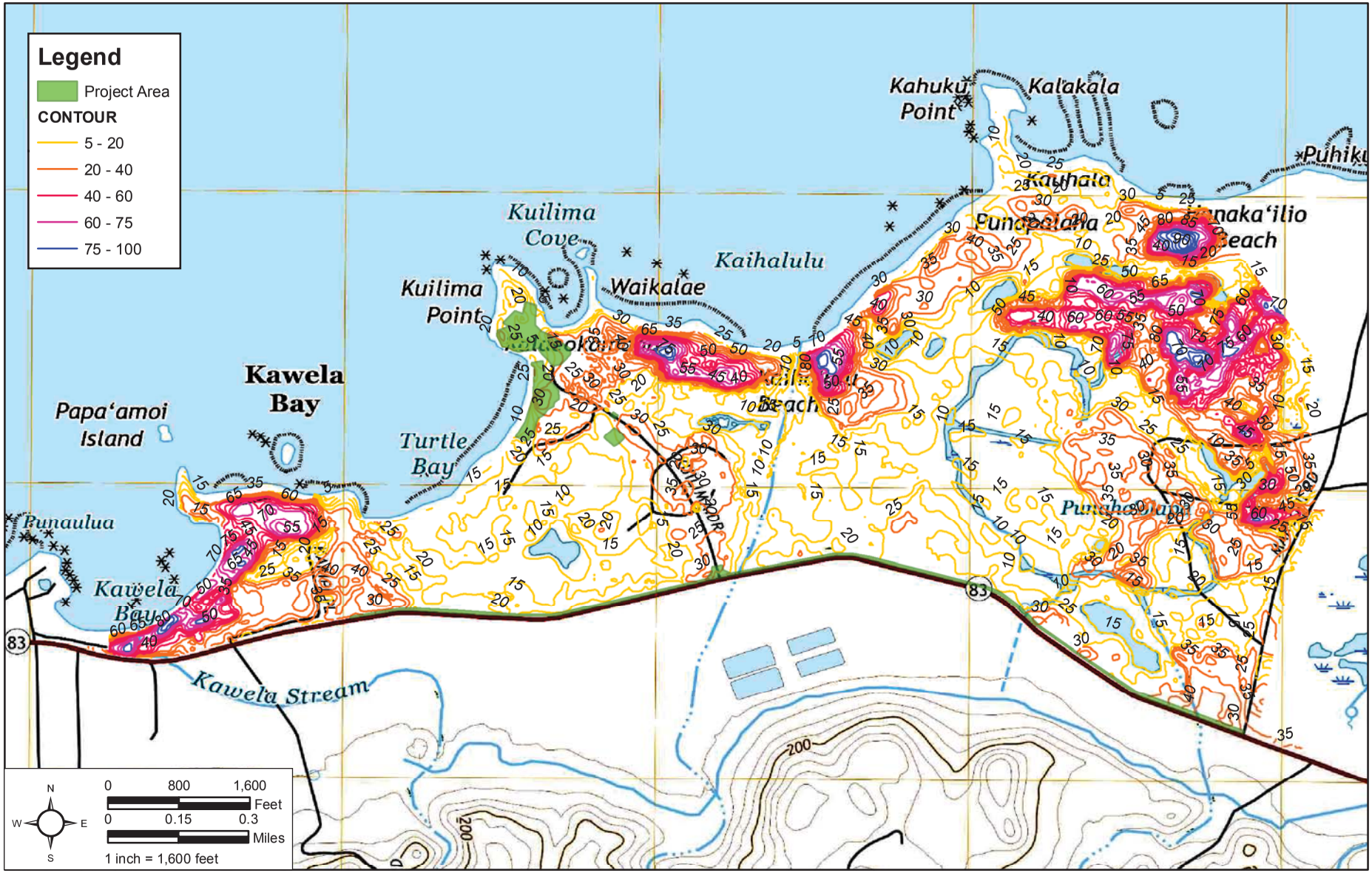

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FIGURE 3-1
TOPOGRAPHIC MAP

TURTLE BAY RESORT HOTEL RENOVATION
KAHUKU, O'AHU, HAWAI'I

3.2.2 Soils

According to the U.S. Department of Agriculture (USDA), Natural Resource Conservation Service, the project area belongs to hydrologic soil group D. The soils underlying the site are classified as Jaucas sand (JaC), Kaloko clay (Kfa), and Waiālua silty clay (WkA) (See Figure 3-2).

Jaucas sand, 0 to 15 percent slopes (JaC) underlies the hotel arrival area, main hotel building, pool area, and beach cottages. This type of soil has rapid permeability and a low retention capacity which may lead to landscape instability. This soil is sandy, single grained, and loose. The hazard of water erosion is slight, but wind erosion is a severe hazard where vegetation has been removed. However, this soil type is very common to underlie urban development.

Kaloko clay, 0 to 2 percent slopes (Kfa) underlies the guard shack and golf cart barn. This type of soil is poorly drained and has slow to moderately slow permeability. This soil is clayey, very, hard, firm, very sticky, and very plastic. Kaloko clay has a high shrink-swell potential which generally makes it unsuitable for heavy building foundations.

Waiālua silty clay, 0 to 3 percent slopes (WkA) underlies the rock wall at the main entrance of the hotel. This soil type is moist, coarse, very hard, firm, very sticky, and very plastic.

Impacts and Mitigation Measures

In the short- and long- term, no significant impacts on soils are anticipated during the construction or operation of the proposed project improvements. The project area is a previously developed site. The proposed construction will not have any deleterious effect on the soils of the site. Since this is in an urban area no agricultural or preservation land will be impacted

Applicable best management practices and erosion control measures will be implemented. As applicable for each phase, these may include but are not limited to: temporary sediment basins, temporary diversion berms and swales to intercept runoff, silt fences, dust fences, slope protection, stabilized construction vehicle entrance, grate inlet protection, truck wash down areas, and use of compost filter socks. Planting of landscaping also will be done as soon as possible on completed areas to help control erosion. Permanent sediment control measures will be used once construction is completed.

Coordination will be undertaken with the appropriate agencies during permitting and construction in order to ensure that the proposed project will not result in significant impacts with regard to soils and erosion. Any discharges related to project construction or operation activities will comply with applicable State Water Quality Standards as specified in Hawai‘i Administrative Rules, Chapter 11-54 and 11-55 Water Pollution Control, Department of Health.

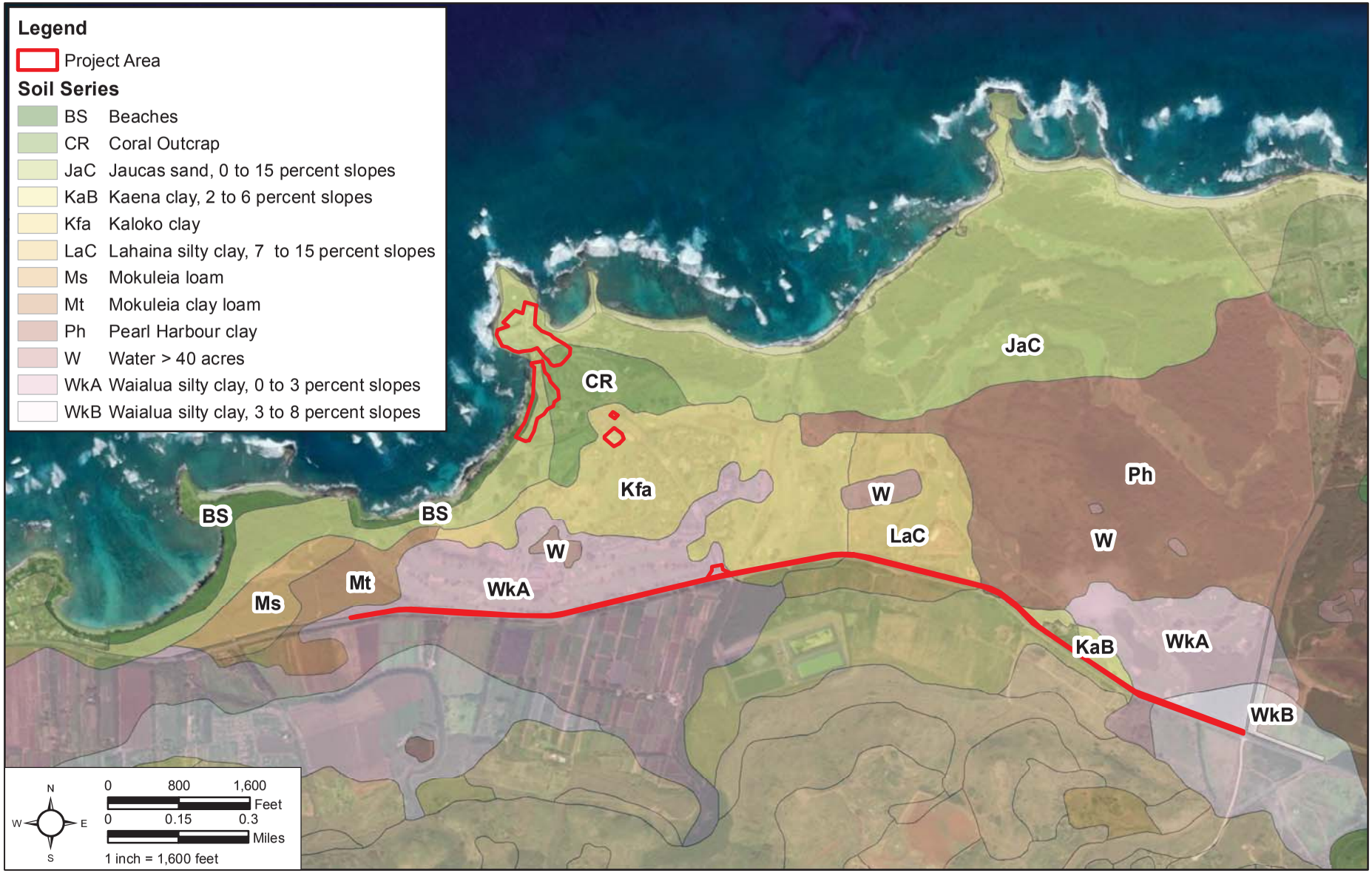

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FIGURE 3-2
SOIL MAP

TURTLE BAY RESORT HOTEL RENOVATION
KAHUKU, O'AHU, HAWAI'I

3.3 Hydrology

3.3.1 Surface Waters

The nearest surface stream in the vicinity of the project area is Kawela Stream, located about 0.93 miles southwest of the project area. Kawela Stream is an unlined, open channel that enters the coastal plain mauka of the western end of the TBR. The stream originates on the western slope of Mount Kawela, near its summit, at an elevation of approximately 800 feet, roughly 1.9 miles inland from the shoreline. The 1990 Hawai‘i Stream Assessment classifies the upper reaches of Kawela Stream as a continuously flowing, perennial stream. However, intermittent flow in the upper reach of the stream through Kawela Gulch makes this an interrupted stream. As the stream emerges from the valley, it makes an abrupt turn to the west and parallels Kamehameha Highway until it is aligned with Kawela Bay where it turns again and enters the ocean near the center of the bay. Makai of the highway, the stream is intermittent with surface flows reaching the coast only during a few significant storm events each year. Often, especially during the winter, the stream may be flowing at the upper elevations but as it approaches the coastal plain the flow percolates to groundwater and into the underground karst cave system. The recent restoration of Kawela Stream to its historical channel improved near-shore water quality in Kawela Bay by removing the source of much of the sediment loading entering the bay.

‘Ō‘io Stream empties into Kuilima Bay near the center of Kaihalulu Beach less than a mile east of the TBR. The stream outlet is often termed the “East Main Drain” and has a total stream length of approximately 4 miles up to the top of the Ko‘olau Mountains at an elevation of 1,200 to 1,600 feet. The stream is listed as a perennial stream in the 1990 Hawai‘i Stream Assessment, but is intermittent in its lower reach across the TBR property. The present straightened alignment of ‘Ō‘io Stream appears to have been constructed as part of the golf course construction in the late 1960s. The stream courses along a relatively straight path from the Kamehameha Highway through the grounds of the Palmer Course, along a primarily grassed and typically dry, swale. The mouth of ‘Ō‘io Stream is confined by a golf course road bridge constructed over three 3-foot diameter drainage pipes leading to the beach.

In addition to ‘Ō‘io Stream, the Fazio and Palmer Golf Courses, located on TBR, contain other drainage channels and ditches, as well as several water features that slow and filter runoff flowing towards the ocean. These courses, in conjunction with two major drainage channels, the East and West Main Drains, were designed to provide flood control mitigation for the TBR property.

Within the Fazio Golf Course, the drainage features include a grassed swale that receives flows from the golf course and the general TBR premises only during heavy rainfall events. The swale empties into the subterranean culverts that extend from the 9th hole of the Fazio Course to the shoreline. The West Main Drain is located at the extreme west end of the perched sandy beach against the base of the rocky headland just inside the western boundary of the Hanakao‘e ahupua‘a. It consists of two 48-inch drains ending at a concrete headwall at the top of the beach with a short channel cut through the beach-rock shoreline to the ocean. The normally dry swale follows around the west edge of the golf course and then parallels the Kamehameha Highway in a broad swale. The swale receives some flow from Fazio Golf Course, but a majority of its flow is fed by the lower slopes of the Ko‘olau Mountains. The total drainage area of both the Kuilima and the West Main Drains is about one-half square mile (80 acres).

During heavy and/or sustained rainfall events, both courses receive runoff that primarily sheet flows across Kamehameha Highway. Ho‘olapa Gulch, which receives flow from Ho‘olapa Stream, also sheet flows into the East Main Drain subsystem, flowing across the golf course to

Punahoʻolapa Marsh. Punahoʻolapa Marsh, which is situated within the Kahuku ahupuaʻa, receives runoff form approximately 423 acres within the TBR property, of which roughly 100 acres make up the marsh. In addition, the marsh receives runoff from areas across Kamehameha Highway to the south.

Impacts and Mitigation Measures

No short- or long-term significant adverse impacts on surface waters in the project vicinity are anticipated during the proposed improvements. Renovation will not involve major land disturbing activities as the proposed improvements are located in a highly disturbed area within the TBR. Applicable erosion control measures and best management practices will be implemented in order to mitigate any possible adverse effects relating to runoff. Moreover, project BMPs are intended to reduce the extent to which sediment disturbed as a result of improvements would be transferred to surrounding coastal waters, and with effective implementation they will contribute minimal adverse impacts to EFH. Additionally, landscaping will be performed as soon as possible on completed areas to help control erosion. Permanent sediment control measures will also be used once renovations are completed.

Coordination will be undertaken with the appropriate agencies during permitting and construction in order to ensure that the proposed project will not result in significant impacts with regard to surface and coastal waters. Any discharges related to project construction or operation activities will comply with applicable State Water Quality Standards as specified in Hawaiʻi Administrative Rules, Chapters 11-54 and 11-55 Water Pollution Control, Department of Health.

3.3.2 Coastal Waters

Kawela Bay (west), Turtle Bay (center), and Kuilima Bay (east) are the nearest coastal waters offshore of the project area. Kawela Point separates Kawela Bay from Turtle Bay, while Kuilima Point, on which the Turtle Bay Hotel sits, separates Turtle Bay from Kuilima Bay.

Kawela Bay encompasses a large (50 acre), relatively shallow bay consisting primarily of a back-reef lagoon with minimal wave impact or influence from coastal currents. Inflow from Kawela Stream during large storm events has a long-lasting and adverse impact on water quality in the bay primarily due to the large quantity of sediment deposited into the bay.

Turtle Bay beach is a half-mile long crescent of white sand beach perched on top of a beach-rock shoreline. Kuilima Point on the eastern end of the beach blocks most of the trade-wind generated swells from the beach, though these swells can wrap around the peninsula, generating a popular surf break in the lee of TBR. A remnant of a prehistoric Stream channel snakes through the reef from the west end of Turtle Bay in a deep 350-foot wide channel and meets the shoreline about a third of the way along the beach towards the Turtle Bay Hotel.

Of the three bays, Kuilima Bay has a shoreline that is most open to the ocean waves and currents. The shore at the ʻŌʻio Stream mouth consists of a raised beach-rock shoreline supporting a perched sand beach. A 20-foot wide channel has been excavated through the beach rock shore to allow for the passage of storm water from the East Main Drain. This depression, however, is often filled with sand from the perched beach to either side.

Pursuant to Hawaiʻi Administrative Rules (HAR) Title 11, Chapter 54, Water Quality Standards, the coastal waters in the vicinity of the project area are classified as Class A marine waters. Class

A marine waters are recognized as waters to be used for "recreational purposes and aesthetic enjoyment to be protected. These waters shall not act as receiving waters for any discharge which has not received the best degree of treatment or control compatible with the criteria established for this class." According to the National Marine Fisheries Service, the marine water column and seafloor in all three bays are designated as Essential Fish Habitat (EFH) and support various life stages for the management unit species (MUS) identified under the Western Pacific Regional Fishery Management Council's Pelagic and Hawai'i Archipelago Fishery Ecosystem Plans (FEPs).

Impacts and Mitigation Measures

No short- or long-term significant adverse impacts on coastal waters in the project vicinity are anticipated during the proposed improvements. Renovation will not involve major land disturbing activities as the proposed improvements are located in a highly disturbed area within the TBR. Applicable erosion control measures and best management practices will be implemented in order to mitigate any possible adverse effects relating to runoff. Moreover, project BMPs are intended to reduce the extent to which sediment disturbed as a result of improvements would be transferred to surrounding coastal waters, and with effective implementation they will contribute minimal adverse impacts to EFH. Additionally, landscaping will be performed as soon as possible on completed areas to help control erosion. Permanent sediment control measures will also be used once renovations are completed.

Coordination will be undertaken with the appropriate agencies during permitting and construction in order to ensure that the proposed project will not result in significant impacts with regard to surface and coastal waters. Any discharges related to project construction or operation activities will comply with applicable State Water Quality Standards as specified in Hawai'i Administrative Rules, Chapters 11-54 and 11-55 Water Pollution Control, Department of Health.

3.3.3 Groundwater

TBR is situated within the region of the Kawela and 'Ō'io watersheds that make up a portion of the northern part of the Ko'olau Loa Aquifer system (See Figure 3-3). The Ko'olau mountain range is a remnant of a deeply eroded shield volcano. As molten lava formed the gently sloping shield, some lava solidified in ground cracks under pressure, creating relatively impervious vertical structures known as volcanic dikes. These dikes control most high-level water in Windward O'ahu (USGS Water Resources of O'ahu, 1968). The Ko'olau Loa dikes underlie the mauka portions of the watersheds and prevent groundwater from easily moving from the upper part of the watersheds to the coastal areas.

Dikes and dike complexes divide the Ko'olau Loa groundwater sources into upper mountain and lower coastal areas. The water stored behind the dikes is referred to as high-level water and is prevented by the dikes from interacting with saltwater. The lower levels are called basal groundwater aquifers. The high-level water recharges basal aquifers and provides stream flow and high quality potable water (KWMP).

TBR is situated over the basal groundwater aquifer, which overlies seawater. Fresh water floats on top of the denser salt water within the basal formation. An important distinction regarding basal water is whether or not it is confined. Confined water has a caprock that generally prevents basal water from freely flowing into ocean waters. The Ko'olau Loa caprock, which extends along the coast from Punalu'u to Kahuku Point, has low permeability that generally limits infiltration and

contamination of the aquifer. Its average vertical permeability tends to be relatively low because of the presence of phenomenon like marsh deposits. But, other units of the caprock-like cavernous limestone derived from coral reefs have extremely high horizontal permeability, meaning that water can flow freely downslope to the ocean. The same caprock that protects the aquifer contains subterranean caverns and channels that were eroded by streams at the low points of sea level changes over tens of thousands of years. This underground system of caverns beneath TBR facilitates the rapid flow of percolated water to the ocean.

The direction of the regional groundwater flow in this area is to the north or northeast and is divided into two, the shallow caprock flow and the deeper basal discharge. It is estimated that the coastal discharge in the Kahuku area amounts to approximately 3.3 million gallons per day (mgd)/mile, or about 80 cubic feet of fresh water per day per linear foot of coastline, including both the deep bedrock and shallow cap-rock aquifers.[1]

The existing TBR water system is currently served by the Board of Water Supply's (BWS) Opana Wells (State Nos. 4101-07 and 4101-08). The two wells are located southwest of Kawela Bay at elevations of 81 feet and 63 feet respectively. The Opana wells have authorized uses of 340,000 and 410,000 gallons per day respectively, providing water for the BWS Service Area that extends from Pūpūkea to TBR and withdraw water from the Kawailoa Aquifer. These wells are part of the Waiālua-Kawela system, which can also receive water from the Waiālua and Hale'iwa wells. The regional system has combined capacity of approximately six million gallons per day.

Impacts and Mitigation Measures

No short- or long-term significant impacts on groundwater in the project vicinity are anticipated during the proposed renovations. Construction activities are not likely to introduce to, nor release from the soils, any materials that could adversely affect the underlying groundwater. Construction material wastes will appropriately be disposed of to prevent any leachate from contaminating groundwater.

3.4 Natural Hazards

3.4.1 Sea Level Rise

The Earth's climate has experience natural changes and variability throughout geologic time, however, the changes that have occurred over the past century are unprecedented. Anthropogenic GHG emissions are causing global warming and climate disruption. The concentration of carbon dioxide, as well as other GHG, are well outside the range of natural variability and are reaching the highest levels seen in at least 800,000 years (Hawai'i Climate Change Mitigation and Adaptation Commission. 2017).

Sea level is rising at increasing rates due to global warming of the atmosphere and oceans and melting of the glaciers and ice sheets. Rising sea level and projections of stronger and more frequent El Niño events and tropical cyclones in water surrounding Hawai'i indicate a growing vulnerability to coastal flooding and erosion.

[1] From "Evaluation of Major Dike – Impounded Groundwater Reservoirs, Island of Oahu," by K. Takasaki, J. Mink, *USGS*

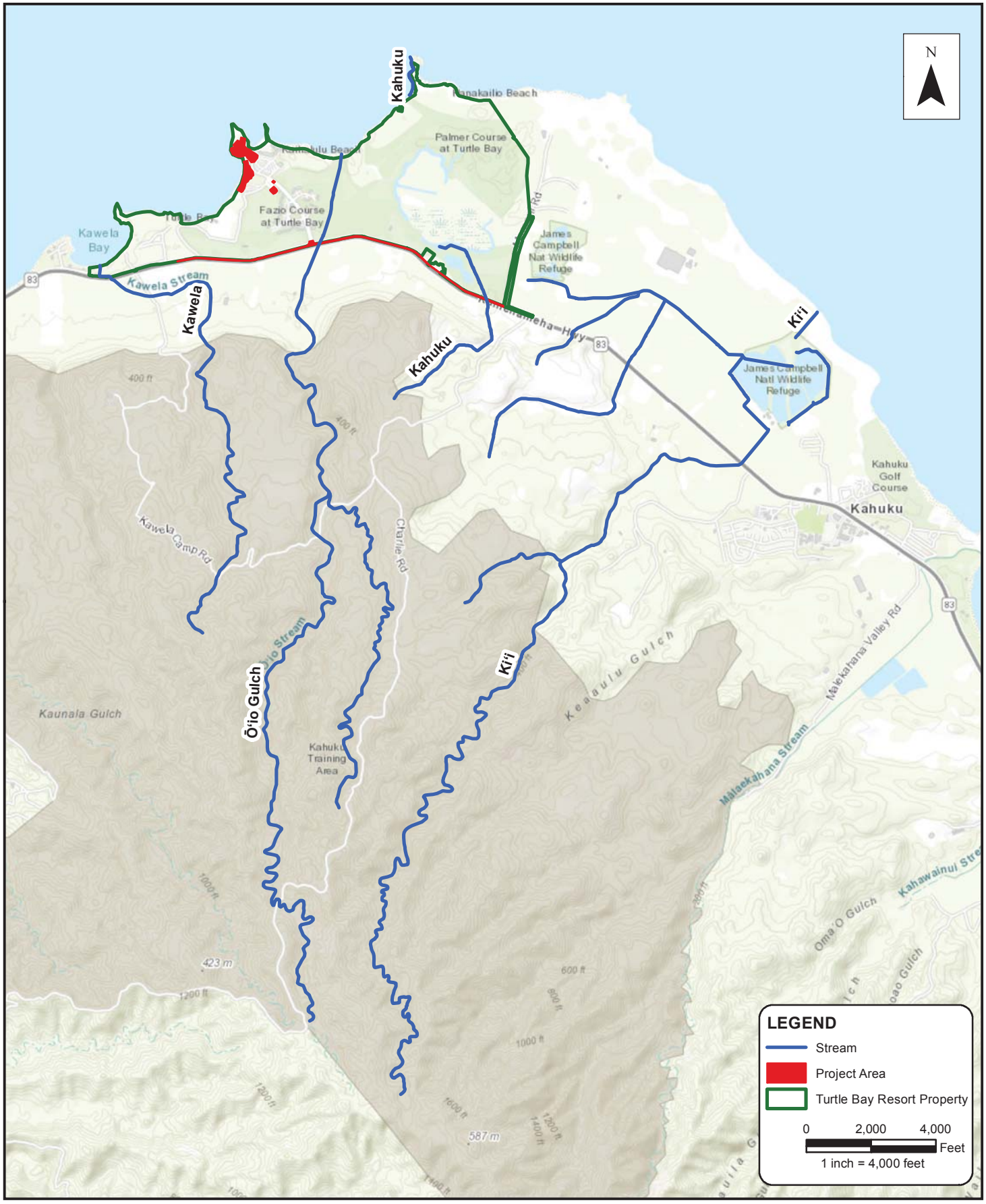

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FIGURE 3-3
SURFACE WATER MAP

TURTLE BAY RESORT HOTEL RENOVATION
KAHUKU, O'AHU, HAWAI'I

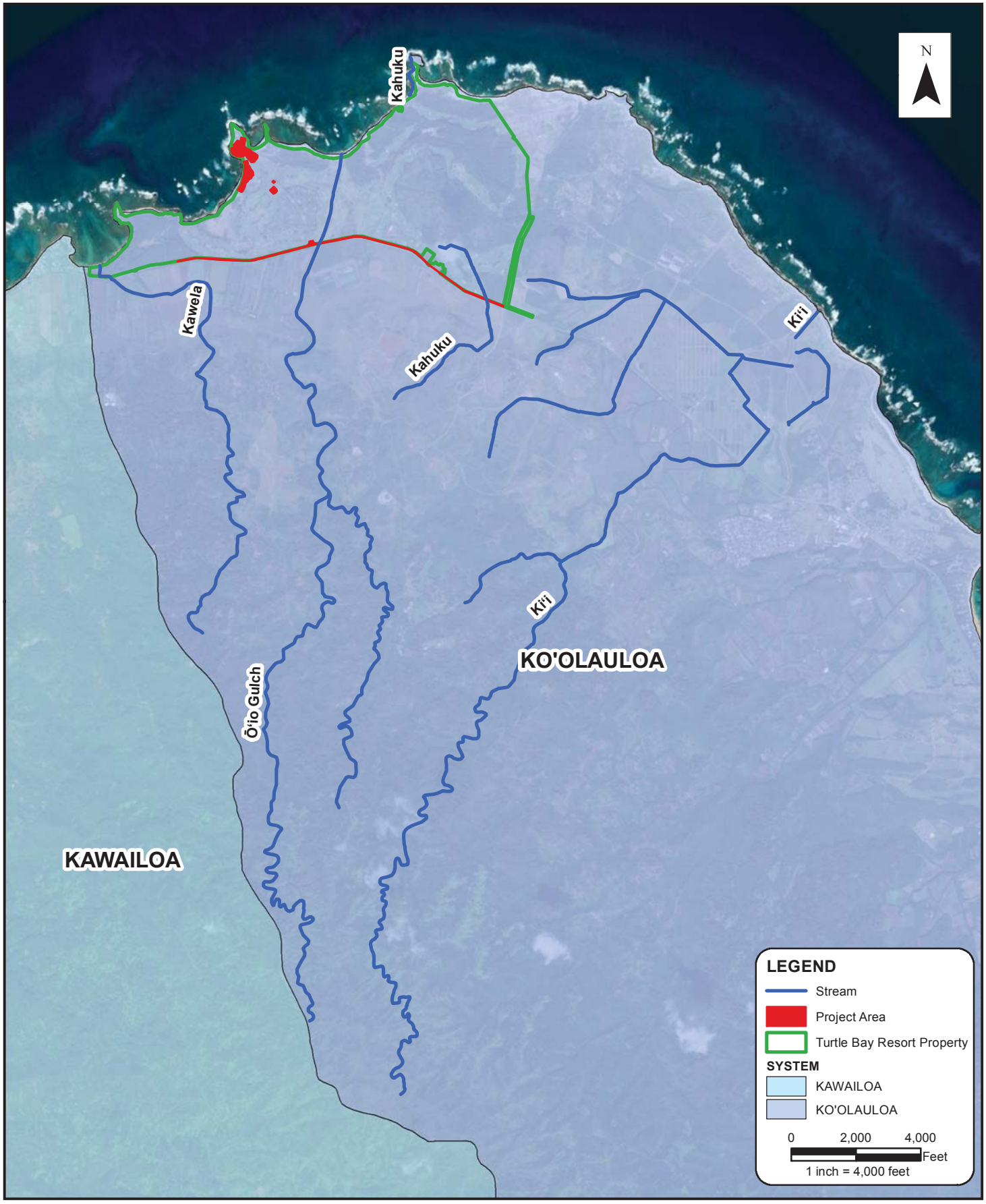

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FIGURE 3-4
AQUIFER MAP

TURTLE BAY RESORT HOTEL RENOVATION
KAHUKU, OʻAHU, HAWAIʻI

Sea level rise can lead to increased coastal inundation due to wave overtopping. Thus higher sea level storm waves can impact areas further inland because the wave heights are further elevated by the increased sea level. Sea level rise can also increase the potential for flooding because it can raise the water table closer to the surface, causing drainage problems during high tides and periods of heavy rainfall.

If GHG emissions are maintained at its current rate of increase, the IPCC (2014) predicts up 3.2 feet of global sea level rise by the year 2100. However, recent observations and projections show that this magnitude of sea level rise could occur as early as year 2060 under recently published high-end scenarios (Sweet et al., 2017). There are questions and debate around the exact timing of that rise due largely to uncertainties around the future behavior of the Earth's cryosphere and global GHG emission trajectories.

In May 2012 USGS published a report discussing beach erosion trends in Hawai'i. The report identified short-term and long-term beach erosion rates at 1,287 separate transects along the North Shore based on data from 5-11 shorelines over the long-term and 5-8 shorelines over the short-term. The report concluded that 24% of the short-term rates and 31% of the long-term rates are significant, the lowest rates of significance on O'ahu. These low significance rates have been attributed to the high seasonal variability in shoreline positions, due primarily to the large winter swells that can alter beach widths up to two-thirds of the existing beach (USGS 2012, p. 33). However, the report noted that the rates of erosion in certain locations are unreliable due to the poor seasonal distribution of available aerial photographs. Moreover, the reported rates of shoreline change represent shoreline movement under past conditions and are not intended for use in predicting future shoreline positions or rates of shoreline change (USGS, p. 1).

The report concluded that the overall trend of North O'ahu beaches is erosion: in the long-term, seventy-three percent of the total extent of North O'ahu beaches is eroding while sixty-eight percent is eroding in the short-term. The two sub-regions of Sunset and Mokulē'ia have an overall trend of long- and short-term erosion, as indicated by average rates. The erosion rate at Kuilima Bay was identified to be up to -0.4 ± 0.2 m/yr , at a 95% confidence level, but a general trend toward beach accretion (increase in beach area) at nearby Kahuku Point (USGS 2012, p. 33) (See Figure 3-4).

Impacts and Mitigation Measures

No short- or long-term impacts on sea level rise are anticipated during the proposed improvements.

TBR lies outside the 3.2 feet of sea level rise exposure area. However, the exact nature of how the sea level will rise is unknown. New information will continually need to be incorporated within future assessments to identify where efforts should be focused when developing adaptation strategies to sea level rise. Coastal structures and facilities require ongoing monitoring and regular maintenance due to their exposure and vulnerability to coastal hazards. It may be reasonable to design coastal protection and stabilization to protect coastal structures and facilities and mitigate the impacts from coastal hazards.

3.4.2 Flood and Tsunami Hazard

Kahuku is vulnerable to flooding from inland streams, hurricane and tropical storm surge, and seasonal high waves. Kahuku, 'Ō'io Stream, and Ho'olapa Stream have historically experienced widespread flooding.

According to the Flood Insurance Rate Map (FIRM), prepared by the Federal Emergency Management Agency (FEMA), the project site includes four flood zones: VE, AE, D and X (See Figure 3-5). In addition, TBR is located within the Tsunami Inundation Zone (see Figure 3-6). With the exception of the property occupied by the Kuilima Estates East and West, and a portion of the Palmer Golf Course of similar size just west of Punahoʻolapa Marsh, the entire TBR property is designated as Zone AE, with base flood elevations determined to be approximately 11 feet. The coast of the TBR property is designated as Zone VE (Coastal Flood Zone with Velocity Hazard) with base flood elevations determined to be between 16 and 17 feet at the coast and 12 to 14 feet several hundred feet inland. The FIRM map indicates that Hoʻolapa Stream, the intermittent stream that enters the property at its southeastern corner, causes episodic flooding corresponding to high volume rain events.

Impacts and Mitigation Measures

In the short- and long-term, no significant impacts on flood hazards in the project area are anticipated as the proposed improvements are not anticipated to increase flood risks or cause any adverse flood-related impacts at the project area or lower elevation properties.

3.4.3 Hurricane and Wind Hazard

The Hawaiian Islands are seasonally affected by Pacific hurricanes from the late summer to early winter months. The State has been affected twice since 1982 by significant hurricanes, ʻIwa in 1982 and ʻIniki in 1992. During hurricanes and storm conditions, high winds create strong uplift forces on structures, particularly on roofs. Wind-driven materials and debris can attain high velocity and cause devastating property damage and harm to life and limb. It is difficult to predict these natural occurrences, but it is reasonable to assume that future events will occur.

Pursuant to the TBR EA-SEIS-2013, TBR has been designated as a private hurricane shelter, meaning that while the facilities are not open to general public as an evacuation center, the Resort contains structures that are designed to accommodate the TBR residents and guests during an emergency. Consequently, the project area is less vulnerable to the destructive winds and torrential rains associated with hurricanes.

Impacts and Mitigation Measures

The potential for hurricanes, while relatively rare, is present. To safeguard against hurricane damage, project improvements will be designed in compliance with American Society of Civil Engineers and International Building Code standards for wind exposure.

3.4.4 Seismic Hazard

The northern shoreline of Oʻahu lies within the Molokaʻi Seismic Zone. This region of Oʻahu is classified as 2A Seismic Zone under the Uniform Building Code (UBC). Zone 2A is characterized as having earthquakes that may cause minor damage to structures. The north shore coastline is assessed to have moderately high vulnerability to earthquakes (Fletcher et al. 2002).

Impacts and Mitigation Measures

No significant impacts are anticipated from either the proposed action or the no action alternative. Oʻahu has not experienced significant seismic events in the modern era. The proposed project improvements would meet prevailing building codes, which incorporate specifications to reduce vulnerability to earthquakes.

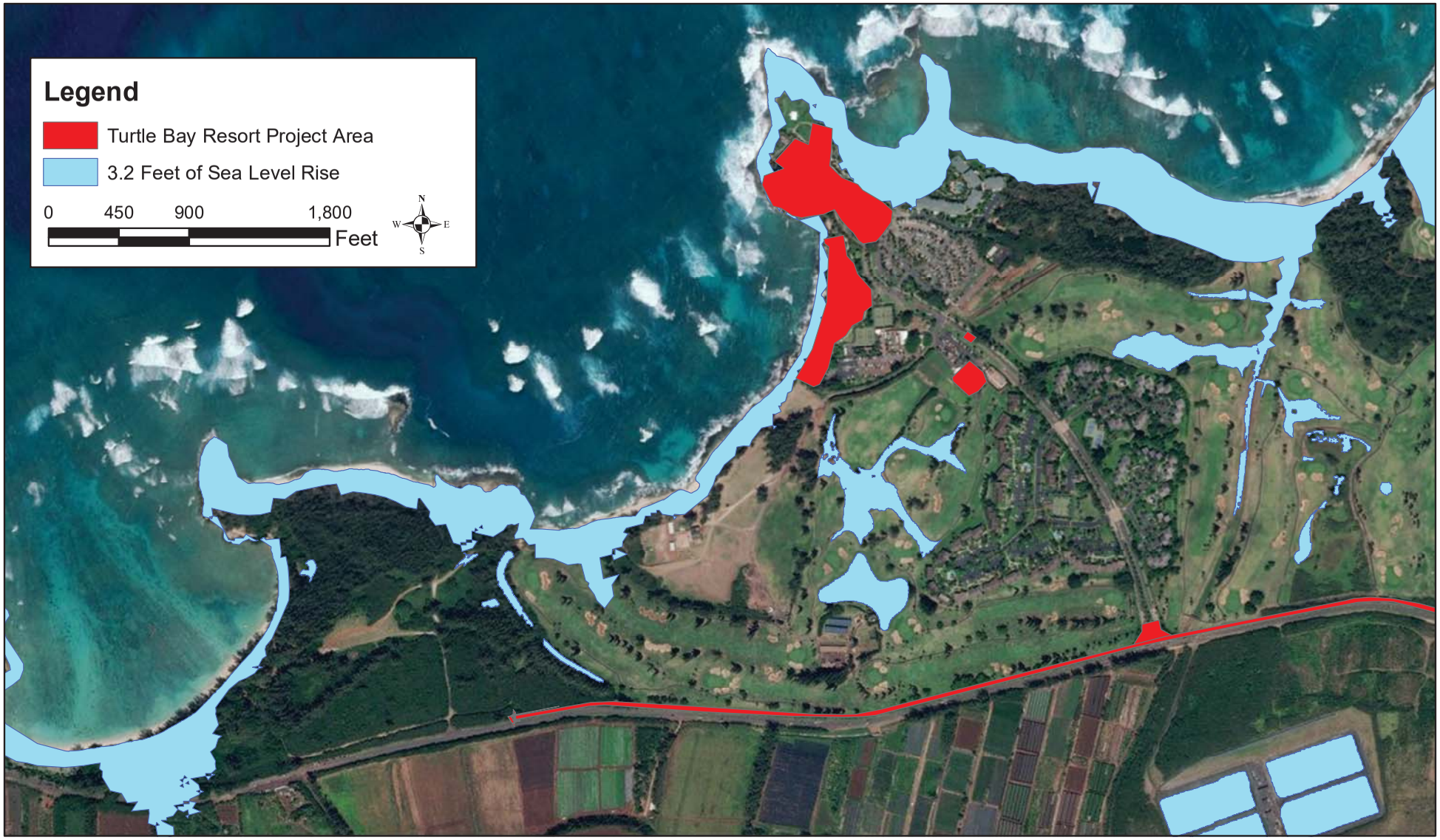

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FIGURE 3-5

Sea Level Rise Exposure Map

Turtle Bay Resort Hotel Renovation
Kahuku, O'ahu, Hawai'i

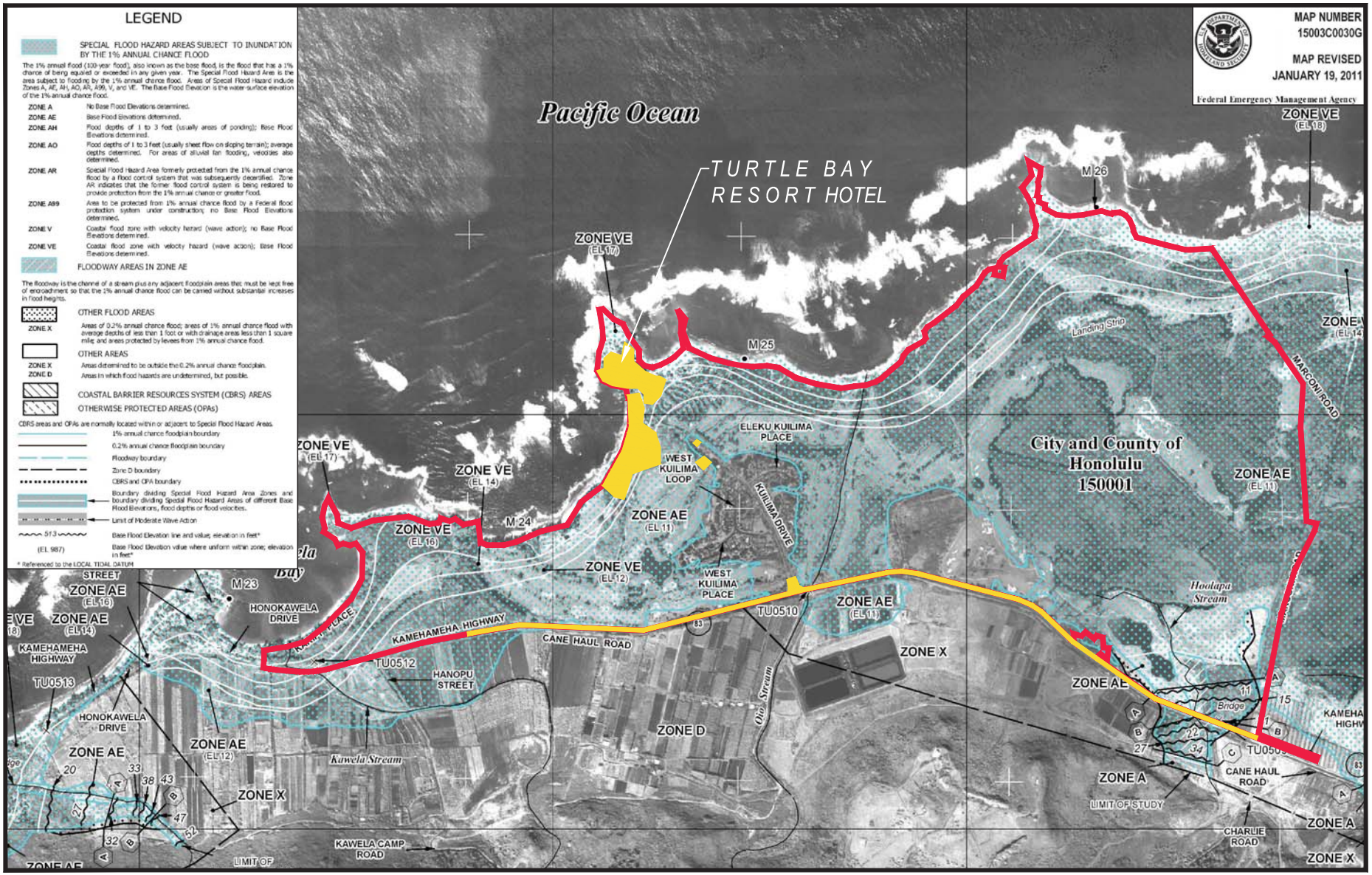

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FIGURE 3-6
FLOOD INSURANCE RATE MAP

TURTLE BAY RESORT HOTEL RENOVATION
KAHUKU, O'AHU, HAWAI'I

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FIGURE 3-7
TSUNAMI EVACUATION ZONE MAP

TURTLE BAY RESORT HOTEL RENOVATION
KAHUKU, O'AHU, HAWAI'I

3.5 Natural Environment

3.5.1 Flora and Fauna

The project area can be generally characterized as a heavily disturbed area that has been subjected to periodic development and redevelopment since the late 1700s. Consequently, no rare, threatened or endangered flora species have been observed to exist in the project area. However, three avian species recorded are endemic endangered waterbird species and four species observed are indigenous migratory shorebirds protected under the Migratory Bird Treaty Act (MBTA). A Biological Assessment conducted by Rana Biological Consulting, Inc., in 2011 reported that no rare plants, or any species currently proposed, or listed under federal or State endangered species statutes were detected. The findings of this report are summarized below.
The project area can be classified as either developed landscape plantings (all TBR grounds, golf courses, and appurtenant facilities) or naturalized, non-native scrub and forest on previously disturbed lands. Based on the botanical surveys, a total of 226 species of vascular plants was identified in the survey area. These plants were identified as Landscape, Forest, Shrub-scrub, Other Scrublands, Wetland, and Strand (a long narrow zone at the coast).

Forest vegetation consists of trees forming a closed or nearly closed canopy, and is considered to be the most complex vegetation type on the property. Forest vegetation vary in composition from place to place, which cover a considerable portion of the TBR property. The Forest vegetation is subdivided into Ironwood Forest, Mixed Forest, and Cook Island Pine Forest. Ironwood forest is found particularly close to the coast and grows on dunes and immediately behind the beach (or rocky shore) in some places. This type of forest is widely incorporated into the landscape of the developed areas including the golf courses, although it is considered invasive in the strand and wetland vegetation areas. Mixed forest are the areas of forest not dominated by ironwood. Many other species such as Chinese violet, Guinea grass, and sourbush, and other species of trees, shrubs, and herbs occur in various parts of these forests, but tend not to dominate.

Shrub-scrub forest are mainly composed of tall woody plants which are dominated by *koa haole* species, a shrub or small tree, and can reach high densities. Former sugar cane land that has remained undeveloped are areas of purest Shrub-scrub vegetation. Typical understory plants in Shrub-scrub are Guinea grass, Chinese violet, and gycine vine (*Neonotonia wightii*). Other Scrublands occur inland from the Strand and are dominated by *Pluchea* spp.

Wetlands on the TBR property can be classified into two groups: 1) former wetlands that were part of the Punahoʻolapa Marsh and 2) wetlands and aquatic features associated with the golf course hazards. Most of the features identified as “wetlands” on the property are open golf course ponds or moat-like ponds. Some of these ponds support wetland vegetation around their margins. Wetland vegetation is present at Punahoʻolapa Marsh east of the main entrance adjacent to Kamehameha Highway, in the lower part of the main drainage swale, and as a shallow man-made wetland/pond west of the latter, northeast of Kuilima Estates. The Wetland areas undergo little to no maintenance. Nearly all of Punahoʻolapa Marsh is overgrown with herbaceous vegetation, significant portions of which support tree growth including areas of *hau* forest and *koa haole* Shrub-scrub and Ironwood Forest.

Strand vegetation occupies a zone of variable width immediately inland of the ocean shore. Some of the vegetation grows on the upper part of active beaches, notably *pōhuehue* or *Ipomoea pes-caprae*. *ʻAkiʻaki* grass or *Sporoblus virginicus* typically seed or invade down the beach by rhizomal growth. In general, this vegetation is found on sand moving slowly inland by the wind, forming

dunes. The width of strand vegetation or distance the Strand extends inland from the beach or rock shore depends on how far inland the dunes extend, salt air effects, and disturbances that damage the vegetation or the substratum. The widest areas of strand vegetation occur at the rocky points (Kahuku and Kuilima) and behind the shore extending east from Kahuku Point. The Strand plant community is dominated by several native species *naupaka kahakai* (*Scaevola taccada*), *'akoko* (*Euphorbia degeneri*), *'aki'aki* (*Sporobolis virginicus*), *hinahina* (*Heliotropium anomalum var. argenteum*), *ma'u* (*Fimbristylis cymosa*), and at least one non-native tree (beach heliotrope or *Tournefortia argentea*).

Approximately twenty percent of the 226 species of vascular plants identified on the project site are ornamentals—landscape plants that are not naturalized in Hawai'i. A much higher percentage (thirty six percent) of the vascular plants serve landscape purposes at TBR, since many naturalized species are also used for landscaping.

Approximately eleven percent of the vascular plants on the project site is Hawaiian natives, and includes indigenous or endemic plants. A majority of these occur in the wetland and coastal strand vegetation, making these two areas the most sensitive botanical areas on the project site.
Another three and a half percent are early Polynesian introductions (technically not native but so-called "canoe" plants that have been in the islands for several thousand years). Only four native species were recorded in the developed and/or landscaped areas of TBR. However, eleven percent of the total number of plant species should not be misinterpreted as constituting eleven percent of the vegetation at TBR. Indigenous plants such as *hala* (*Pananus tectorius*), *naupaka* (*Scaevola taccada*), and *niu* (coconut or *Cocus nucifera*) are prominent species in the landscaping of TBR. The same is true for the wetland and the most seaward part of the strand vegetation, where native plants tend to dominate.

Based on the avian and mammal surveys conducted as part of the 2011 Biological Assessment, a total of 1,735 individual birds of 27 species, representing 19 different families were found. Three of the avian species recorded are endemic endangered waterbird species—Common Gallinule (*Gallinula galeata sandvicensis*), Hawaiian Coot (*Fulica alai*), and Hawaiian Stilt (*Himantopus mexicanus knudseni*). One species recorded, Black-crowned Night-Heron (*Nycticorax nycticorax hoactli*) is an indigenous water obligate species, and four species, Pacific-Golden Plover (*Pluvialis fulva*), Wandering Tattler (*Tringa incana*), Bristle-thighed Curlew (*Numenius tahitiensis*), and Ruddy Turnstone (*Arenaria interpres*) are indigenous migratory shorebirds protected under the migratory bird Treaty Act (MBTA). The remaining 19 species detected are considered to be alien to the Hawaiian Islands.

Avian diversity and densities are consistent with the vegetation and current usage of the project site, most of which are golf course, condominium units, apartments, hotel, or open maintained parkland. Four species, Common Waxbill (*Estrilda astrild*), Red-vented Bulbul (*Pycnonoyus cafer*), Zebra Dove (*Geopelia striata*), and Japanese White-Eye (*Zosterops japonicas*) accounted for 51 percent of all birds recorded, with the Common Waxbill being the most common.

No federally delineated Critical Habitat is present or adjacent to the project site within TBR. However, the James Campbell National Wildlife Refuge, which is identified as Critical Habitat, is located on the western side of Marconi Road. In addition, Punaho'olapa Marsh and the Kuilima Wastewater Treatment Plant setting ponds mauka of Kamehameha Highway are identified as Supporting Habitat of several species of endangered waterbirds.

Eight terrestrial and one marine mammalian species were detected on site during the course of the survey. With the exception of the endangered Hawaiian monk seals (*Monachus*

schauinslandi), all of the mammals recorded on site are alien to the Hawaiian Islands. These alien mammalian species included European house mouse (*Mus musculus domesticus*), Domestic dog (*Canus f. familiaris*), Small Indian mongoose (*Herpestes a. auropunctatus*), House cat (*Felis catus*), Domestic horse (*Equus c. caballus*), Donkey (*Equus a. asinus*), Mule (*Equus asinus x Equus caballus*), and Pig (*Sus s. scrofa*). No Hawaiian hoary bats were observed.

The findings of the mammalian survey were consistent with the current habitat present on site and the land usage of the areas surveyed. Although three species of rodents found on O'ahu (roof rat–*Rattus r. rattus*; Norway rat–*Rattus norvegicus*; Polynesian rat–*Rattus exulans hawaiiensis*; and European house mouse–*Mus musculus domesticus*) were not detected during the course of the surveys, it is likely they use various resources found within the general project area on a seasonal basis. These three human commensal species are drawn to areas of human habitation and activity. All of these introduced rodents are deleterious to native ecosystems and the native faunal species dependent on them.

Fourteen different aquatic species of mollusks, crustaceans, insects, amphibians, and fishes in have been identified in Kawela Stream stream. Four species are endemic, including *Eleotris sandvicensis*, one is indigenous, and nine of the species are naturalized. None of the aquatic species surveyed are listed as threatened or endangered. (AECOS)

Impacts and Mitigation Measures

In the long-term, potential adverse impacts on flora and fauna are not anticipated. The project area is located within a disturbed environment. No listed or protected plant species are known from the project area. Rare, threatened, or endangered fauna are not known to utilize the project site for either habitat or foraging purposes. Improvement activities may temporarily disrupt routine behavior of common faunal species in the immediate project area, but will not result in permanent displacement, or adversely affect regional distribution of affected fauna. Once project activities are complete, faunal activity in the vicinity of the work site is expected to return to pre-existing conditions.

No adverse impacts resulting from the project are anticipated. However, to prevent adverse effects to protected seabirds from night lighting, the project will comply with the requirements set forth by Chapter 201-8.5 of the Hawai'i Revised Statutes.

Overall, the shoreline area is envisioned as a healthy natural system comprising of native Hawaiian plants, which offers a true Hawaiian sense of place, protects the development from storm events, and where a suite of nature-based activities and opportunities to learn about the environment can be enjoyed in a landscape that is sustainably managed.

Removing invasive species, revegetating with native plant species, improving wildlife habitat, protecting the magnificent shoreline, and adopting sustainable landscape management practices that are feasible and practical, are necessary to achieve the desirable environmental conditions and to support a nature-based destination envisioned by TBR which will better serve its guests, island visitors and local resident

3.6 Historic and Archaeological Resources

A Supplemental Archeological Inventory Survey (SAIS) of the overall TBR property was conducted from December 2011 to February 2012 by Haun & Associates as part of the SEIS for the TBR expansion in 2013. The survey included a literature review which was comprised of studies of archival sources, historic maps, Land Commission Awards (LCA) and previous

archaeological reports to construct a history of land use and to determine if archaeological resources have been recorded on or near the TBR property. A field inspection of the TBR property followed the SAIS to identify and surface archaeological resources and to investigate and assess the potential for impact to such sites. The inspection also sought to identify any sensitive areas that may require further investigation or mitigation before the project proceeds. The findings of the subject SAIS are summarized below.

Archaeological and historical research indicate that the Kahuku Point vicinity was well populated and extensively cultivated in late prehistory. Land Commission Awards document continued traditional Hawaiian settlement in the mid-1800s, which was soon displaced after the establishment of Kahuku Ranch in the 1850s. The ranch prospered and expanded for nearly four decades until the establishment of the Kahuku Plantation Company 1890. The first harvest from 2,800 cultivated acres of sugarcane was harvested in 1892. By 1899, the OR&L railroad line extended from Honolulu to Kahuku, transporting sugarcane to the market, and in the early 1900s, stations were built at Kawela and Kahuku Ranch. In 1935, 4,490 acres of sugarcane were cultivated by 1,100 plantation workers living in the plantation camp established on the TBR property.

In 1942, the U.S. Army established Kahuku Army Airfield, which served as an auxiliary field for flight training and coastal defense. Military use of the facility ended shortly after the end of World War II.

Sugarcane cultivation continued until 1971 when TBR and the first golf course were constructed. Some inland portions of the property continued to be used for vegetable farming until the late 1980s. Private beach cottages lined the shores of Kawela Bay until 1990 when the area was cleared and preliminary construction for a hotel began. The hotel project was later abandoned in 1991.

The SAIS Plan guided-surface and -subsurface surveys documented thirty-nine sites consisting of 10 traditional Hawaiian habitation sites, 2-3 sites dating to the late 1800s, 3 sites associated with 1930s operation of Marconi Wireless Station, 22 sites that were part of the United States Army Airfield at Kahuku, and an abandoned 1950s Honolulu City and County transit bus. Prehistoric to early historic remains on the TBR property include subsurface cultural deposits and a variety of subsurface features such as fire pits, post molds and burial sites, most of which date to between AD 1400 and 1800. Historic remains dating back to the 1800s and 1900s include the OR&L railroad, plantation infrastructure and walls marking property boundaries, and livestock control features from Kahuku Ranch. Military-related, World War II remains include runways, revetments, defensive fortifications, and a variety of support facilities. None of the archaeological sites identified in the 2013 SEIS were found within the project area.

At the request of BRE Turtle Bay Development, LLC, ASM Affiliates has prepared an Archaeological Monitoring Plan (AMP), a Burial Treatment Plan (BTP), a Data Recovery Plan (DRP), and a Preservation Plan (PP) to provide a basis for handling and mitigating potential impacts to archaeological and historic resources at TBR. While the subject BTP has been approved by SHPD, the AMP, DRP, and PP are under review.

The approved BTP establishes procedures for the appropriate treatment of SIHP Sites 4488, 6411, 7288, 7289, and the Historic Period grave site of Daniel Pahu. This BTP follows the process described in the applicable sections of Chapter 6E - Historic Preservation (Hawai‘i Revised Statutes; as amended), and in the current Hawaii Administrative Rules (HAR 13§13-300) for the

treatment of burial sites and human remains, approved and adopted by the State of Hawai'i. The proposed treatment for Sites 4488, 6411, 7289 and the Daniel Pahu grave site and reinterment area is preservation in place. The proposed treatment for Site 7288 is relocation to the reinterment area at the Daniel Pahu grave site. Long-term preservation will be accomplished through the creation of preservation easements consisting of protective buffers that extend around each site at a predetermined distance from the site boundaries.

The DRP provides guidance for the recovery of significant archaeological data. There are four phases of the plan: the subsurface reconnaissance survey, intensive survey and test excavations, preparation of DRP, and DRP implementation. ASM Affiliates (ASM) has prepared this data recovery plan on behalf of TBR to mitigate potential impacts to three archaeological sites (SIHP Sites 50-80-02-7289, 7290, and 7291). The DRP found the Kahuku Point Archaeological Area and the Kawela Bay Archaeological Area appear to have been prehistorically permanently inhabited, at least from the 12th century on. Goals from the DRP were to determine the absolute ages of the cultural deposits and to assess the temporal relationship among the three sites.

Impacts and Mitigation Measures

No significant impacts to historic and archeological resources are anticipated. The proposed improvements are situated on a heavily disturbed area within the TBR property that does not contain any of the historical or archaeological resources identified in the SAIS and subsequent field inspection. Should any significant archaeological, cultural, or historic resources be found during construction activities, all work will cease and SHPD will be notified immediately for appropriate response and action.

The AMP outlines that prior to the start of any proposed subsurface development activities, a meeting will be held among any relevant construction team member/contractors, the project proponent, the project's Principal Archaeologist and primary archaeological monitor to ensure that any protective conditions placed on the project by DLNR-SHPD with respect to existing archaeological preservation and burial treatment plans will be established prior to initiating construction. Also prior to the initiation of construction, the project's Principal Archaeologist and the primary archaeological monitor will meet with the equipment operators to discuss the procedures for monitoring. It will be explained that the monitoring archaeologist(s) has/have the authority to halt ground-disturbing activities in the event that cultural resources are encountered. If cultural resources identified during monitoring are deemed significant, DLNR-SHPD will be notified and consultation will be coordinated as appropriate with any groups or organizations. Additionally, DLNR-SHPD will be notified upon the onset and completion of the monitoring activities. Any change in status of the monitoring (i.e., a shift from on-site to on-call) will occur only with prior written approval from DLNR-SHPD.

3.7 Cultural Resources and Practices

A Cultural Impact Assessment (CIA) for TBR was prepared as part of the 2013 SEIS TBR expansion by Pacific Legacy, Inc. The proposed project area lies within the Shoreline Management Area, which is bounded by Kawela Bay, Marconi Road and Kamehameha Highway. The study found that the TBR property and surrounding areas contain an array of cultural resources that are currently being used for traditional cultural practices, including marine food and recreational resources, medicinal plants, plants used for crafting, and salt for various uses. However, none of the cultural resources and activities identified in the report occur within the project area.

Impacts and Mitigation Measures

None of the cultural resources, practices or accesses identified in the SEIS Cultural Impact Assessment (Pacific Legacy, 2012) are currently associated with or evident in the project area, which is situated in a highly developed area.

Based on the above, the potential for adverse effects on traditional and cultural practices is not anticipated. The proposed project improvements will not disturb traditional sacred sites or traditional cultural objects; will not result in the degradation of resources used by native Hawaiians for subsistence or traditional cultural practices; will not obstruct culturally significant landforms or way-finding features; and, will not result in loss of access to the shoreline or other areas customarily used by Native Hawaiians or others for resource gathering or traditional cultural practices. No mitigation measures are proposed.

3.8 Air Quality

The State of Hawai'i Department of Health (DOH), Clean Air Branch, monitors the ambient air quality in the State for various gaseous and particulate air pollutants. The U.S. Environmental Protection Agency (EPA) has set national ambient air quality standards (NAAQS) for six criteria pollutants: carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), lead (Pb), ozone (O_3), and particulate matter (PM_{10} and PM_2). Hawai'i has also established a state ambient air standard for hydrogen sulfide (H_2S) related to volcanic activity on Hawai'i Island. The primary purpose of the statewide monitoring network is to measure ambient air concentrations of these pollutants and ensure that these air quality standards are met.

Air pollution in Hawai'i is caused by many different anthropogenic and natural sources. There are industrial sources of pollution, such as power plants and petroleum refineries; mobile sources, such as cars, trucks and buses; agricultural sources, such as crop burning, and natural sources, such as windblown dust and volcanic activity. The DOH Clean Air Branch is responsible for regulating and monitoring pollution sources to ensure that the levels of criteria pollutants remain well below the State and federal ambient air quality standards.

The State maintains six air monitoring stations on the island of O'ahu, where most commercial, industrial and transportation activities and their associated air quality effects occur. The closest air monitoring station is located in Pearl City, which is located approximately 20 miles southwest of the project site. TBR is located on the windward side of the Ko'olau Mountains at the northern tip of O'ahu near Kahuku Point. There are no published wind data for this area of O'ahu. Based on the project site and the good exposure to the trade wind flow, ventilation can be expected to be good much of the time.

Kamehameha Highway, which passes near the project area to the south, is a major arterial roadway that presently carries moderate to heavy levels of vehicle traffic during peak traffic hours. Emissions from motor vehicles using this roadway, primarily nitrogen oxides and carbon monoxide, will tend to be carried away from the project site by the prevailing winds.

Natural sources of air pollution emissions that also could affect the project area but cannot be quantified very accurately include the ocean (sea spray), plants (aero-allergens), wind-blown dust, and perhaps distant volcanoes on the island of Hawai'i.

Impacts and Mitigation Measures

In the short- and long-term, no significant impacts on air quality are anticipated as a result of the construction and operation of the proposed project. A portion of the construction for the proposed project will involve fine grading as well as limited excavation for rock walls, demolition of existing buildings, and construction of new structures. Fugitive dust will be controlled, as required, by methods such as dust fences, water spraying and sprinkling of loose or exposed soil or ground surface areas. As deemed appropriate, planting of landscaping will be done as soon as possible on completed areas to also help control dust. Respective contractors will be responsible for minimizing air quality impacts during the various phases of construction.

Exhaust emissions from construction vehicles are anticipated to have negligible impact on air quality in the project vicinity as the emissions would be relatively small and readily dissipated. In the long-term, some vehicular emissions related to operations at the project area are expected, however, due to the generally prevailing trade winds, the emissions would be readily dissipated.

3.9 Noise

The existing noise environment at the project area is mainly due to vehicular traffic traveling along Kamehameha Highway and adjacent roadways. However, Paradise Helicopters provides tours from a helipad situated at the eastern end of the project site. Helicopter tour and charter flights are conducted from 8am to 6pm daily. This may minimally increase the noise environment when the helicopters are taking off, landing, or directly overhead the project site. On the project site, the noise sources also include surf, birds, and winds in foliage.

Impacts and Mitigation Measures

In the short-term, noise from the proposed improvements will be unavoidable. The increase in noise level will vary according to the particular phase of construction. Noise may also increase as a result of operation of heavy vehicles and other power equipment during the construction period.

Renovation noise impacts will be mitigated by compliance with provisions of the State DOH Administrative Rules, Title 11, Chapter 46, “Community Noise Control” regulations. These rules require a noise permit if the noise levels from construction activities are expected to exceed the allowable levels stated in the DOH Administrative Rules. It shall be the contractor’s responsibility to minimize noise by properly maintaining noise mufflers and other noise-attenuating equipment, and to maintain noise levels within regulatory limits. Also, the guidelines for heavy equipment operation and noise curfew times, as set forth by the DOH noise control rules, will be adhered to; or, if necessary, a noise permit shall be obtained.

In the long-term, no significant noise impacts are anticipated once renovations have been completed.

3.10 Hazardous Materials

A hazardous material item is generally characterized as any item or agent (physical, chemical, or biological) which has the potential to cause harm to humans, animals, or the environment, either independently or through interaction with other factors. Toxic Materials are specific hazardous materials identified in regulations. Hazardous wastes are specifically defined or determined as

such based on their ignitability, corrosiveness, reactivity, and toxicity. The potential impacts hazardous materials and waste have on human health and the environment are largely dependent upon their types, quantities, toxicities, and management practices.

Hazardous wastes may take the form of a solid, liquid, contained gas, or semi-solid. In general, any combination of wastes that poses a substantial present or potential hazard to human health or the environment that has been discarded or abandoned is a hazardous waste.

EPA and Hawaii universal waste regulations streamline hazardous waste management standards for federally-designated "universal wastes," which include: batteries, pesticides and mercury-containing materials. Universal wastes are considered hazardous, however, they are subject to less restrictive waste disposal regulations than for hazardous wastes.

Hazardous wastes, including used oils, antifreeze and solvents associated with construction are handled and disposed of by licensed contractors.

Currently, operations conducted at TBR do not involve the use and storage of hazardous materials. Nonetheless, construction activities associated with the implementation of the proposed project improvements may involve the use of materials and processes that involve chemical agents or materials typical to construction that could be considered hazardous. These materials are primarily associated with vehicle and/or equipment maintenance that typically include flammable and combustible liquids, acids, aerosols, batteries, corrosives, solvents, paints, and hydraulic fluids.

Impacts and Mitigation Measures

Hazardous materials would be utilized and generated as the result of some of the functions of the operations of the proposed project improvements. However, these functions are consistent with current standard hotel functions, and the hazardous materials used and generated as a result are not different from existing materials. The proposed action would not result in significant changes to the handling, use, or disposal of hazardous materials at TBR.

Hazardous materials, including chemicals, petroleum-based projects, and waste materials, including solid and liquid waste, would be stored in areas specifically designed to prevent discharge into storm water runoff. Areas used for storage of toxic materials would be designed with full enclosure in mind. Portions of the hotel were constructed before the use of asbestos was banned. Proposed repair and maintenance work would likewise require the removal of asbestos materials if encountered. These remediation activities would comply with all established regulations and procedural guidelines.

Design features specific to the reduction of the potential effects of hazardous spills will be implemented, where appropriate.

No significant impacts to hazardous waste disposal are anticipated to result from the implementation and operation of the proposed project improvements.

3.11 Traffic

Access to TBR is provided by Kamehameha Highway, a primary arterial highway owned and maintained by the State of Hawai‘i. It is a two-way, two-lane, undivided highway with posted speeds of 35 mph west of TBR and 45 mph to the east. The portion of Kamehameha Highway

extending from Hale‘iwa to Kane‘ohe is identified as Route 83. Kamehemeha Highway generally follows the coastline, except for the Kahuku area and the Hale‘iwa area where it turns inland. The highway consists of a 50-foot wide right-of way with pavement widths of 20 to 24 feet and unpaved shoulders. In most areas, there are no sidewalks and pedestrians must walk on the shoulders.

Kuilima Drive provides access to the existing Turtle Bay Hotel, Kuilima Estates, and golf courses for TBR guests, visitors, residents, golfers, and hotel service vehicles. It is a privately owned and maintained four-lane, two-way divided roadway that intersects Kamehameha Highway at a stop sign controlled T-intersection.

Impacts and Mitigation Measures

No short- and long-term significant impacts are anticipated on traffic conditions in the vicinity of the project.

Additional traffic would occur from construction workers traveling to and from the job site. The construction traffic management plan would identify appropriate parking areas for construction workers and constructions vehicles that will park within the project area and, thus will not affect traffic flow along adjoining roadways except while traveling to and from the site. Construction contractor(s) will be required to mitigate potential vehicular and pedestrian traffic impacts through appropriate traffic control measures and safety devices. Examples of such measures that may be implemented include:

- Publishing newspaper notices to alert the public of construction projects;
- Providing signage and other warning to alert approaching motorists and pedestrians to construction activities ahead;
- Providing barriers, cones, signage, lighting, non-skid covering over trenches, adequate and safe sidewalk widths, adequate intersection visibility and other provisions to promote safe passage of vehicles and pedestrians through construction zones;
- Restricting transport of construction vehicles during school and commuter peak traffic hours;
- Providing flaggers and/or police officers, when necessary, to control traffic and pedestrian flow;
- Notifying providers of emergency services (fire, ambulance, police) prior to implementation of any required detours or street closures;
- Coordinating with the City Department of Transportation Services (DTS) and O‘ahu Transit Services of any detours or street closures; and,
- Providing appropriate barriers as necessary to deter the public from unauthorized entry into restricted or hazardous construction zones during working and nonworking hours.

Within the project area, provisions will be implemented for the safe passage of pedestrians around the project site during construction activities. The contractor may implement necessary measures such as temporary chain-link fences to protect materials and construction-related equipment areas would be clearly marked and temporary fences used to keep unauthorized persons out.

Public shoreline access will be maintained throughout the course of all repair and maintenance activities associated with the proposed action.

3.12 Visual Resources

Hawai'i's visual resources are important to the state's tourism industry and the quality of life enjoyed by the State's residents. The State's visual resources include a broad range of natural and developed areas and a tremendous variety of land uses, water bodies, and vegetation types. These visual resources also include urbanized areas that range from small rural towns to the metropolitan center of Honolulu.

The Ko'olau Loa Sustainable Communities Plan (SCP) Open Space Map identifies lateral views from Kahuku Point and Kuilima Point to the east and west as important panoramic views of the coastline of Turtle Bay and Kuilima Bay. Buildings including hotels and resort residential developments are visible, but do not detract from the panoramic coastal views identified in the Ko'olau Loa SCP.

Impacts and Mitigation Measures

The proposed project improvements will not materially alter existing view planes. Improvements are limited to repair and maintenance work and do not include major structural additions / modifications, that could expand upon or alter existing building elevations or footprints. Consequently, no significant impacts to visual resources are anticipated.

3.13 Socio-Economic Characteristics

The project area is located within the Kawela Bay Census Designated Place (CDP). However, the proposed project is also anticipated to affect the surrounding Pupukea CDP and Kahuku CDP communities. Demographic and other information was reviewed from the U.S. Census 2010 for the Kawela Bay CDP, Pukukea CDP, Kahuku CDP, and the City and County of Honolulu. The Pukukea CDP, Kawela Bay CDP, and Kahuku CDP's were combined and compared with the City and County of Honolulu, as shown on Table 3-1. The demographics from the individual CDP's are shown on Table 3-2.

Based upon the data shown on the table, the combined Kawela Bay CDP, Pukukea CDP, and Kahuku CDP has a slightly older population than the City and County of Honolulu. The median age of the population for the three combined CDP's was 38.2 versus 37.8 for the County.

By racial mix, the three combined CDP's have a substantially lower percentage of Asians (16.3%) than the County (43.9%). The three combined CDP's have a higher percentage of Whites (42.4%) and those of two or more races (23.9%) than the County (20.8% and 22.3%, respectively). The three combined CDP's have a higher percentage of Native Hawaiian and other Pacific Islander (15.2%) than the County (9.5%).

According to the 2010 Census, the three combined CDP's have a lower occupancy rate, 77.6%, than the County, 92.3%. Housing units in this region are largely occupied by owners at 41%. In both the County data and the three combined CDP's, there are a larger proportion of housing units occupied with owners. The vacant units' percentage is vastly higher in the three combined CDP's (22.4%) than the County (7.7%).

Table 3-1
Combined Demographic Characteristics
(Pupukea CDP, Kawela Bay DCP, and Kahuku CDP Combined)

Subject	Pupukea CDP, Kawela Bay CDP, and Kahuku CDP		City and County of Honolulu	
	Number	Percent	Number	Percent

Total Population	**7,495**	**100**	**953,207**	**100**
AGE				
Under 5 years	547	7.3	61,261	6.4
5-19 years	1,477	19.7	174,309	18.3
20-64 years	4,706	62.8	579,147	60.8
65 years and over	765	10.2	138,490	14.5
Median age (years)	38.2	--	37.8	--
RACE				
White	3,180	42.4	198,732	20.8
Black or African American	38	0.5	19,256	2.0
American Indian and Alaskan Native	23	0.3	2,438	0.3
Asian	1,223	16.3	418,410	43.9
Native Hawaiian and other Pacific Islander	1,132	15.2	90,878	9.5
Two or more races	1,792	23.9	213,036	22.3
Other	107	1.4	10,457	1.1
HOUSEHOLD (BY TYPE)				
Total households	**2,395**	**100**	**311,047**	**100**
Family households (families)	1,589	66.3	328,953	70.0
Married-couple family	1,187	49.6	161,172	51.8
With own children under 18 years	504	21	65,995	21.2
Female householder, no husband present	265	11.1	39,435	12.7
With own children under 18 years	107	4.5	15,027	4.8
Nonfamily household	766	32	93,205	30.0
Average household size	3.08	--	2.95	--
HOUSING OCCUPANCY AND TENURE				
Total housing Units	**3,033**	**100**	**336,889**	**100**
Occupied Units	2,355	77.6	311,047	92.3
By owner	1,244	41	174,387	56.1
By renter	1,111	36.6	136,660	43.9
Vacant Units	678	22.4	25,852	7.7

Table 3-2
Demographic Characteristics

Subject	Pupukea CDP		Kawela Bay CDP		Kahuku CDP	
	Number	Percent	Number	Percent	Number	Percent
Total Population	**4,551**	**100**	**330**	**100**	**2,614**	**100**
AGE						

Under 5 years	293	6.4	18	5.5	236	9.0
5-19 years	729	16.0	56	17.0	692	26.5
20-64 years	3,110	68.3	199	60.3	1,397	53.4
65 years and over	419	9.2	57	17.2	289	11.1
Median age (years)	37.3	--	47.3	--	30.1	--
RACE						
White	2,706	59.5	250	75.8	224	8.6
Black or African American	26	0.6	2	0.6	10	0.4
American Indian and Alaskan Native	20	0.4	1	0.3	2	0.1
Asian	548	12.0	13	3.9	662	25.3
Native Hawaiian or other Pacific Islander	229	5.0	15	4.5	888	34.0
Two or more races	922	20.3	47	14.2	823	31.5
Other	100	2.2	2	0.6	5	0.2
HOUSEHOLD (BY TYPE)						
Total households	**1,580**	**100**	**153**	**100**	**622**	**100**
Family households (families)	1,011	64.0	83	54.2	495	79.6
Married-couple family	758	48.0	69	45.1	360	57.9
With own children under 18 years	314	19.9	20	13.1	218	35.0
Female householder, no husband present	157	9.9	12	7.8	96	15.4
With own children under 18 years	64	4.1	8	5.2	35	5.6
Nonfamily household	569	36.0	70	45.8	127	20.4
Average household size	2.88	--	2.16	--	4.20	--
HOUSING OCCUPANCY AND TENURE						
Total housing Units	**1,878**	**100**	**518**	**100**	**637**	**100**
Occupied Units	1,580	84.1	153	29.5	622	97.6
By owner	827	52.3	87	56.9	330	53.1
By renter	753	47.7	66	43.1	292	46.9
Vacant Units	298	15.9	365	70.5	15	2.4

Impacts and Mitigation Measures

In the short- term, construction expenditures related to the project will provide positive benefits to the local economy. This would include creation of construction and construction support jobs, and the purchase of materials from local suppliers, as well as indirect benefits to local retail businesses and restaurants from the anticipated increase in tourism spending resulting from the completion of construction activities.

3.14 Public Services and Facilities

3.14.1 Police, Fire, and Medical

Police Services: Police protection is provided by the City's Honolulu Police Department. The project area is a part of District 4, which is HPD's largest patrol area, extending from Makapu'u Point to Kawela Bay. The main station is located in Kāneohe, however, the project area is served by the Kahuku Substation located at 56-470 Kamehameha Highway, approximately 4 miles southeast of the project area.

Private security is provided at TBR.

Fire Services: Fire protection is provided by the City's Honolulu Fire Department. There are five fire stations located near the project site, located in Ka‘a‘awa, Hau‘ula, Kahuku, Sunset Beach, and Waialua. The project area is served by the Kahuku Fire Station located at 56-460 Kamehameha Highway, approximately 4 miles southeast of the project area.

Medical Services: The closest hospital is the Kahuku Medical Center located at 56-117 Pualalea Street, approximately 3.5 miles southeast of the project site. The Kahuku Medical Center is part of the Hawai‘i Health Systems Corporation and offers a comprehensive range of primary and specialized care services.

Emergency medical service is provided by the City's Emergency Services Department, Emergency Medical Services (EMS) Division. The Department has 20 ambulance units under two districts. All ambulance units are designated as advanced life support units, meaning they are staffed by at least two people. The project area is served by District 2, and the closest EMS units are based at the Kahuku Fire/Police Station located at 56-460 Kamehameha Highway, approximately 4 miles southeast of the project area. The Honolulu Fire Department also co-responds to medical emergencies, providing first aid in coordination with EMS.

Impacts and Mitigation Measures

In the short-term, the project may have adverse impacts such as temporary disturbance of traffic, which could affect emergency vehicle access through the project area. During the construction period, flagmen or off-duty police officers will be present to direct traffic and emergency vehicles.

In the long-term, the proposed project my require occasional police and fire protection, as well as medical services, however it would likely not represent a significant amount relative to the overall regional demand.

The proposed project will be designed and built in compliance with the applicable County fire code requirements.

3.14.2 Education

The project area is located within the State Department of Education's (DOE) Leilehua-Mililani-Waialua Complex Area and Castle-Kahuku Complex Area. These two areas include Haleiwa, Waialua, Hau‘ula, Ka‘a‘awa, Kahuku, Laie, and Sunset Beach Elementary Schools; and, Waialua and Kahuku Middle Schools, which feed into either Waialua High School or Kahuku High School. St. Michael's School, Sunset Beach Christian, and Hawai‘i Active Learning Academy are also located within the vicinity of the site. DOE records indicate that the complex has served approximately 5,000 students on an annual basis for the past several years. Generally speaking, statewide total enrollment numbers in DOE schools have remained virtually flat over the course of the past decade, fluctuating less than 2% in growth/decline on an annual basis.

The closest DOE school is Kahuku High School, located approximately 4 miles from the project area.

Impacts and Mitigation Measures

In the short- and long-term, no significant impacts or increase in demand on schools are anticipated. There are no residences proposed so the project will not induce population growth. Therefore, it is not expected to affect student enrollment at public schools in the area.

3.14.3 Recreational

The primary recreational facilities within the project site include the Fazio and Palmer Golf Courses, tennis courts, swimming pools, and equestrian center. TBR also offers guided horseback riding tours and the option to rent kayaks and standup paddleboards. Other recreational opportunities available at the Property through the Turtle Bay Hotel include bicycle rentals, surfing lessons and helicopter tours. There are a number trails for walking and running, as well as opportunities for fishing, boating, snorkeling, diving and sailing within or in close proximity to TBR.

Near the project site, the North Shore's coastline offers a mix of surfing, boating, fishing, body boarding, walking, biking, sightseeing, and swimming activities. The North Shore attracts great number of surfing enthusiasts, not only from locals, but throughout the entire world. The North Shore also offers dolphin excursions, shark adventures, farm tours, and fishing charters.

The region also boasts famous beaches including Hale'iwa Beach, Ali'i Beach, Waimea Bay, 'Ehukai Beach, Sunset Beach, and Kawela Bay. Kahuku District Park and Waialua District Park are also in the area and have various sports fields and picnic areas. Malaekahana Beach Campground located 5 miles east of the project site provides beach camping areas.

Within Ko'olau Loa, the Ahupua'a o Kahana State Park is an entire valley dedicated as a cultural park, with marked trails for hikers and walkers. Waimea Valley, on the North Shore, has extensive horticultural plantings and cultural exhibits. Just seven miles southeast of the project site is the Polynesian Cultural Center (PCC) which serves as a world famous visitor destination, with "villages" representing several island societies, *lu'au* dinners, and an evening show. South of the project site, Kualoa Ranch offers a range of outdoor activities for visitors, including horse rides and all-terrain vehicle tours.

Impacts and Mitigation Measures

In the long-term, no significant impacts to recreational facilities along the North Shore are anticipated as a result of the construction and operation of the proposed project. Once finished, the proposed project will provide enhanced experiences for guests of the Turtle Bay Hotel who will be able to enjoy repaired and refurbished recreational facilities on the project site.

In the short-term, although the resort will continue to operate, construction will require that various areas of TBR be closed to resort guests and the public. However, the resort's existing use would return to normal upon completion of the proposed project.

3.14.4 Solid Waste Collection and Disposal

Solid waste generated by existing activities and construction at TBR, the Kuilima Estates, and private operations (restaurants), is collected by Honolulu Disposal, a private contractor. Solid waste collected is transported to either H-Power at Campbell Industrial Park for incineration that generates electricity, followed by disposal of ash and non-combustibles at the Waimanalo Gulch Sanitary Landfill.

In terms of recycling, TBR utilizes bins for sorting glass, plastic, and paper, and operates its own cardboard compactor/baling machine. On-site green waste generated from the Hotel and golf course maintenance is generally mulched and re-used on-site.

Impacts and Mitigation Measures

In the short-term, impacts to solid waste collection and disposal facilities are anticipated as material wastes are produced from construction, demolition, restoration and remodeling projects. Material wastes may include insulation, nails, electrical wiring, rebar, wood, plaster, scrap metal, cement, and bricks.

In the long-term, no significant impacts to municipal solid waste collection and disposal facilities are anticipated as a result of the construction and operation of the proposed project.

3.15 Infrastructure and Utilities

3.15.1 Water System

3.15.1.1 Potable Water System

The existing water supply, transmission, and distribution system is owned and operated by the Board of Water Supply (BWS). The existing infrastructure at the project site has been constructed in accordance with BWS standards. The existing TBR is served by the Opana Wells. The Ko'olau Loa Watershed system consists of two wells: Opana I (state well no. 4101-07) and Opana II (state well no. 4101-08). The two wells are located southwest of Kawela Bay at elevations of 81 feet and 63 feet respectively. The two wells have authorized uses of 340,000 and 410,000 gallons per day respectively. Water from the Opana Wells is conveyed to the Kawela Reservoir by a 16-inch water main located within Kamehameha Highway and a 20-inch water main along the access road to the reservoir. A 12-inch diameter water line extends *makai* under Kuilima Drive from the 16-inch main under Kamehameha Highway. The 12-inch line provides the existing Turtle Bay Hotel, the golf course, and the Kuilima Estates with drinking water.

Impacts and Mitigation Measures

No short- or long-term significant impacts are anticipated to result from the development and operation of the proposed project improvements.

3.15.1.2 Irrigation System

Non-potable irrigation water at TBR is supplied by two (2) non-potable wells that have been approved by the State Water Commission. Non-potable irrigation water at the resort is supplied by two (2) non-potable wells that have been approved by the State Water Commission. The non-potable water well that is supposed to be used by BRE Turtle Bay Resort LLC for golf course irrigation is Well No. 3-4159-001 & 002, on the makai side of Kamehameha Highway.

Impacts and Mitigation Measures

No short- or long-term significant impacts to the irrigation system are anticipated as a result of the construction and operation of the proposed project.

3.15.2 Wastewater System

A 16-inch sewer line privately owned and operated lies beneath Kamehameha Highway. This treatment plant and system is owned by BRE Turtle Bay Wastewater, LLC, an affiliate of BRE

Turtle Bay Resort, LLC (Applicant), and is operated by Aqua Engineers, a third party Federal and State certified Wastewater Treatment Operator as a public utility regulated by the Public Utilities Commission. Wastewater generated from existing TBR facilities is conveyed through underground pipelines to the Kuilima Wastewater Pump Station, which is located near the existing Golf Clubhouse parking lot on the mauka side of Kamehameha Highway. After wastewater reaches the Kuilima Wastewater Pump Station, it is pumped to the Turtle Bay Wastewater Treatment plant for treatment and disposal. The plant treats 250,000 gallons per day and produces R-2 effluent. After treatment, wastewater is blended with brackish water and used to irrigate the Palmer golf course and roadway medial strips at TBR.

Impacts and Mitigation Measures

No short- or long-term significant impacts to the irrigation system are anticipated as a result of the construction and operation of the proposed project. The proposed developments and construction are not anticipated to create any new wastewater demand.

3.15.3 Drainage System

TBR was designed to utilize the Fazio and Palmer Golf courses in conjunction with two major drainage channels, the East and West Main Drain, to provide flood control mitigation for the TBR property.

East Main Drain System**:** ʻŌʻio stream directly enters TBR through a 22-foot long, 7-foot high bridge on Kamehameha Highway and continues in channels to four 72 inch diameter culverts close to the coastline. The Fazio and Palmer Golf Courses receive runoff that primarily flows across Kamehameha Highway during heavy and/or sustained rainfall events. Hoʻolapa Gulch also flows into the East Main Drain. The runoff from ʻŌʻio Stream flows to the East Main Drain and Hoʻolapa Gulch flows across the golf course to Punahoʻolapa Marsh. Additional runoff flows from the Palmer Golf Course through breaks in the sand.

West Main Drain System: Kawela Stream primarily flows across Kamehameha Highway. A channel with a 30-foot base width passes on spillover to two 48-inch drains near the coastline. Presently, the Kawela Stream runoff flows primarily to the Kawela Stream, then to the West Main Drain. It also flows through the Fazio Golf Course and/or to undeveloped lands to the West Kuilima Drain and infiltrates in the sand dunes.

Punahoʻolapa Marsh: Punahoʻolapa Marsh receives runoff from approximately 425 acres within the project site, of which roughly 93 acres (drainage area) constitutes the marsh. In addition, the marsh also receives runoff from areas across Kamehameha Highway to the south, including runoff from Hoʻolapa Gulch (298 acres) and a drainage area of 132 acres south of Pump 2. The water collected within the marsh seeps into the ground and does not flow elsewhere.

Impacts and Mitigation Measures

No short- or long-term significant impacts on the quantity or quality of drainage in the project vicinity are anticipated during construction or operation of the proposed project.

3.15.4 Electrical and Communications System

Electrical power on the island of Oʻahu is provided by Hawaiian Electric Company (HECO). An existing electrical substation, called the Kuilima Substation, is located *mauka* of the project site.

Telephone service in the area is provided by Hawaiian Telcom.

Spectrum is the local CATV provider for the North Shore region.

Impacts and Mitigation Measures

No short- or long-term significant impacts to the electrical and communications system are anticipated as a result of the construction and operation of the proposed project. The proposed developments and construction are not anticipated to create any new demand.

3.16 Secondary and Cumulative Impacts

Secondary Impacts are characterized by either indirect or induced effects that occur later in time, at some distance from the project, or are generally considered associated with the chain of cause-and-effect relationships associated with a project. Indirect effects typically include induced growth and related environmental impacts.

The proposed improvements encompass enhancements to existing resort facilities. No additional resort keys or residential units are proposed and existing commercial/retail floor space will not be expanded. Although the proposed improvements are intended to enhance the economic vitality of the existing resort, they will not directly correlate to either the creation of new jobs or an increase to visitor or residential capacity at the resort. Consequently, no significant secondary impacts are anticipated.

Cumulative impacts are the aggregate result of incremental direct and indirect effects of a project or plan, effects of past and present actions, and effects of other reasonably foreseeable future actions on resources of concern. It is anticipated that the proposed action could result in cumulative impacts should associated construction work coincide with other on-going repair and maintenance work or construction activities. Moreover, it is acknowledged that the scope of associated construction work and infrastructure improvements to be implemented in parallel to proposed action is intended to support the future development of the TBR site as outlined in the 1986 SMA and 2013 Supplemental EIS.

It is reasonably foreseeable that certain other construction activities might take place at the Property at or around the time of the Proposed Action. While these other construction activities are not part of the subject SMA permit application, we include the following discussion in light of their relative timing and proximity to the Proposed Action. These activities will not be supported by the EA, but are listed and acknowledged below:

- Wastewater Pump station and force main from the Fazio Golf Course maintenance shed: This connection to the resort's existing wastewater system is needed to comply with wastewater disposal requirements and is exempt from SMA permit requirements.

- Aerial Adventure Park: Construction and operation of a Ropes Course / Aerial Challenge Course is being pursued by a private entity on space licensed within resort grounds (specifically, TMK No. 5-6-003-056). No determination has been made by DPP whether the proposed course would be subject to SMA approval, however it is anticipated that compliance with various building and plan review requirements is necessary.

  The subject course will be set up in existing trees or on poles constructed in the resort's natural outdoor environment, and will be comprised of eight to twelve 'trails' or 'courses', each leading into the treetops from a large central platform. The proposed park will include 100-120 elements (or crossings between tree platforms). These elements would be

constructed from wood, rope, cable and netting and consist of bridges, hanging vines, tunnels, swings, zip lines, and other features.

It is anticipated that guests will arrive and park at main resort area for check in and ticketing. Once processed, they will be shuttled to the park site via multi passenger golf carts along existing utility roads. When not climbing on the course guests are planned to be kept on mulched paths and designated picnic areas, and when desired, guests may hop on a shuttle back to main resort area.

The proposed park will operate on a year round, daily basis. Construction is anticipated to commence in November of 2019, pending the approval of required permits.

- Infrastructure construction: Pursuant to the 1986 Unilateral Agreement, 1986 SMA Permit and the 2013 Supplemental EIS, the construction of supporting infrastructure for future resort development may be pursued in parallel to the implantation of the improvements assessed under this EA process. These infrastructure improvements may include intersection improvements on Kamehameha Highway at the Kuilima Drive intersection and the entrance to the planned City park; underground infrastructure along a portion of Kaihalulu Drive; and, wastewater pump station upgrade. As noted above, these infrastructure improvements are intended to support future development of TBR as outlined in the 1986 SMA Permit and 2013 Supplemental EIS. Should construction of the proposed improvements overlap any of these other construction activities, movement of construction vehicles and construction workers, including parking and staging areas will be coordinated to minimize impacts on guests and residents at the resort as well as to traffic along Kamehameha Highway.

4. RELATIONSHIP TO PLANS, POLICIES, AND CONTROLS

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

4.1.1 Hawai‘i State Plan

The Hawai‘i State Plan, Chapter 226, HRS, as amended, provides goals, objectives, policies, and priorities for the State. The purpose of the Hawai‘i State Plan is to set forth a plan that shall serve as a guide for the future long-range development of the State; identify the goals, objectives, policies, and priorities for the State; provide a basis for determining priorities and allocating limited resources, such as public funds, services, human resources, land, energy, water, and other resources; improve coordination of federal, state, and county plans, policies, programs, projects, and regulatory activities; and to establish a system for plan formulation and program coordination to provide for an integration of all major state, and county activities. The proposed project's consistency with applicable objectives and policies is discussed below.

§226-4 State goals. In order to ensure, for present and future generations, those elements of choice and mobility that ensure that individuals and groups may approach their desired levels of self-reliance and self-determination, it shall be the goal of the State to achieve:

(1) A strong, viable economy, characterized by stability, diversity, and growth, that enables the fulfillment of the needs and expectations of Hawai‘i's present and future generations.

(2) A desired physical environment, characterized by beauty, cleanliness, quiet, stable natural systems, and uniqueness, that enhances the mental and physical well-being of the people.

(3) Physical, social, and economic well-being, for individuals and families in Hawai‘i, that nourishes a sense of community responsibility, of caring, and of participation in community life.

Discussion:

The proposed project encompasses a range of much needed renovations to the existing Turtle Bay Hotel and various facilities that support the hotel operations. The proposed renovations are intended to maintain the range and quality of resort amenities and enhance the overall guest experience at the resort. Moreover, the context and character of the proposed renovations are consistent with land use plans, policies, and controls and would not be detrimental to the overall appearance or aesthetics of the surrounding region.

The proposed project is intended to maintain and enhance the economic and market viability of TBR, and will serve to promote an optimal balance of economic, social, and cultural vitality at the resort while maintaining the rural and scenic character of the coastline for the enjoyment of the guests and community at large.

The proposed renovations will allow TBR to continue to operate as an economically sustainable resort and both preserve and enhance the direct and indirect employment opportunities as well

as immediate and long-term economic benefits associated with its operation to the North Shore community, the island of O‘ahu, and the State of Hawai‘i.

§226-5 Objective and policies for population.

(a) It shall be the objective in planning for the State's population to guide population growth to be consistent with the achievement of physical, economic, and social objectives contained in this chapter.

To achieve the population objective, it shall be the policy of this State to:

(1) Manage population growth statewide in a manner that provides increased opportunities for Hawai‘i's people to pursue their physical, social, and economic aspirations while recognizing the unique needs of each county.

(3) Promote increased opportunities for Hawai‘i's people to pursue their socio-economic aspirations throughout the islands.

Discussion:

The proposed project will support the objectives and policies of the State outlined in *§226-5* of the Hawai‘i State Plan.

The proposed project is intended to maintain and enhance the economic and market viability of TBR, and will serve to promote an optimal balance of economic, social, and cultural vitality at the resort while maintaining the rural and scenic character of the coastline for the enjoyment of the guests and community at large.

The proposed renovations will allow TBR to continue to operate as an economically sustainable resort and both preserve and enhance the direct and indirect employment opportunities as well as immediate and long-term economic benefits associated with its operation to the North Shore community, the island of O‘ahu, and the State of Hawai‘i.

§226-6 Objectives and policies for the economy--in general.

(a) Planning for the State's economy in general shall be directed toward achievement of the following objectives:

(1) Increased and diversified employment opportunities to achieve full employment, increased income and job choice, and improved living standards for Hawai‘i’s people.

(2) A steady growing and diversified economic base that is not overly dependent on a few industries, and includes the development and expansion of industries on the neighbor islands.

(b) To achieve the general economic objectives, it shall be the policy of this State to:

(6) Strive to achieve a level of construction activity responsive to, and consistent with,

state growth objectives.

(8) Encourage labor-intensive activities that are economically satisfying and which offer opportunities for upward mobility.

(9) Foster greater cooperation and coordination between the public and private sectors in developing Hawai'i's employment and economic growth opportunities.

(10) Stimulate the development and expansion of economic activities which will benefit areas with substantial or expected employment problems.

(11) Maintain acceptable working conditions and standards for Hawai'i's workers

(14) Promote and protect intangible resources in Hawai'i, such as scenic beauty and the aloha spirit, which are vital to a healthy economy.

Discussion:

The proposed action will support the objectives and policies of the State for the economy – in general.

The proposed project will maintain and enhance TBR as a sustainable resort and residential development that will continue to provide direct and indirect employment opportunities and contribute immediate and long-term economic benefits to the North Shore community, the island of O'ahu, and the State of Hawai'i. Specifically, the proposed project will contribute to the State's economy by providing:

- Short-term employment opportunities associated with the renovations and construction of the proposed project improvements

- Long-term employment opportunities associated with the TBR operations, as well as renovations to and maintenance of the TBR improvements and renovations

Moreover, the proposed project will maintain public beach and shoreline access for the guests and the community at large, serving to promote Hawai'i's scenic beauty and resources.

§226-8 Objective and policies for the economy--visitor industry.

(a) Planning for the State's economy with regard to the visitor industry shall be directed towards the achievement of the objective of a visitor industry that constitutes a major component of steady growth for Hawai'i's economy.

(b) To achieve the visitor industry objective, it shall be the policy of this State to:

(1) Support and assist in the promotion of Hawai'i's visitor attractions and facilities.

(2) Ensure that visitor industry activities are in keeping with the social, economic, and physical needs and aspirations of Hawai‘i's people.

(3) Improve the quality of existing visitor destination areas.

(5) Develop the industry in a manner that will continue to provide new job opportunities and steady employment for Hawai‘i's people.

Discussion:

The proposed action will support the State's objectives and policies for the economy regarding the visitor industry.

The proposed project is intended to maintain and enhance the economic and market viability of TBR, and will serve to promote an optimal balance of economic, social, and cultural vitality at the resort while maintaining the rural and scenic character of the coastline for the enjoyment of the guests and community at large.

The proposed renovations will allow TBR to continue to operate as an economically sustainable resort and both preserve and enhance the direct and indirect employment opportunities as well as immediate and long-term economic benefits associated with its operation to the North Shore community, the island of O‘ahu, and the State of Hawai‘i.

§226-11 Objectives and policies for the physical environment--land-based, shoreline, and marine resources.

(a) To achieve the land-based, shoreline, and marine resources objectives, it shall be the policy of this State to:

(1) Prudent use of Hawai‘i's land-based, shoreline, and marine resources.

(2) Effective protection of Hawai‘i's unique and fragile environmental resources.

(b) To achieve the land-based, shoreline, and marine resources objectives, it shall be the policy of this State to:

(2) Ensure compatibility between land-based and water-based activities and natural resources and ecological systems.

(3) Take into account the physical attributes of areas when planning and designing activities and facilities.

(6) Encourage the protection of rare or endangered plant and animal species and habitats native to Hawai‘i.

(8) Pursue compatible relationships among activities, facilities, and natural resources.

(9) Promote increased accessibility and prudent use of inland and shoreline areas for public recreational, educational, and scientific purposes.

Discussion:
The proposed action will support the objective and policies for the physical environment – land-based, shoreline, and marine resources.

The proposed project falls within the limits of existing developed footprints. Project improvements will include improvements to the existing hotel and its ancillary facilities. Refurbishments include repairs to the main hotel building, interior and exterior improvements, reconfiguration of the pool and recreational areas, and establishment of public shoreline access in compliance with land use entitlements. The improvements will be designed and operated to integrate with the fabric and daily activities of community to increase public shoreline access.

Construction BMPs will be implemented in accordance with City and County ordinances pertaining to grading, grubbing, stockpiling, soil erosion, and sedimentation during construction. BMPs will also be implemented for long-term development and operation of activities occurring on the site as part of pollution prevention measures.

§226-12 Objective and policies for the physical environment--scenic, natural beauty, and historic resources.

(a) Planning for the State's physical environment shall be directed towards achievement of the objective of enhancement of Hawai'i's scenic assets, natural beauty, and multicultural/historical resources

(b) To achieve the scenic, natural beauty, and historic resources objective, it shall be the policy of this State to:

(4) Protect those special areas, structures, and elements that are an integral and functional part of Hawai'i's ethnic and cultural heritage.

Discussion:
The proposed project will support the objectives and policies for the physical environment – scenic, natural beauty, and historic resources. Where applicable, native plant species will be featured in the landscaping palette.

The proposed project will involve the erection of ahu (rock pedestals) about 4 to 5 feet high to mark the historical boundaries of the ahupua'a that run through the TBR property. These ahu are intended as a call back to / preservation of a design element considered an integral and functional part of Hawai'i's cultural heritage.

§226-13 Objectives and policies for the physical environment--land, air, and water quality.

(a) Planning for the State's physical environment with regard to land, air, and water quality shall be directed towards achievement of the following objectives:

(1) Maintenance and pursuit of improved quality in Hawai'i's land, air, and water resources.

(2) Greater public awareness and appreciation of Hawai'i's environmental resources.

(b) To achieve the land, air, and water quality objectives, it shall be the policy of this State to:

(2) Promote the proper management of Hawai'i's land and water resources.

(6) Encourage design and construction practices that enhance the physical qualities of Hawai'i's communities.

(8) Foster recognition of the importance and value of the land, air, and water resources to Hawai'i's people, their cultures and visitors.

Discussion:

The proposed action will support the objectives and policies for the physical environment – land, air, and water quality.

Today, a growing interest in sustainability has heightened public awareness of the applicability of traditional Hawaiian land use and cultural practices to modern economic activities. TBR has incorporated components of these principles into the planning and design process for this project. The intent of this integration is to promote the proper management of the area's land and water resources to guide and inform TBR's renovations and improvements with a strong emphasis on the importance of natural resource preservation. The proposed project falls within the limits of existing developed footprints.

§226-23 Objective and policies for socio-cultural advancement--leisure.

(a) Planning for the State's socio-cultural advancement with regard to leisure shall be directed towards the achievement of the objective of the adequate provision of resources to accommodate diverse cultural, artistic, and recreational needs for present and future generations.

(b) To achieve the leisure objective, it shall be the policy of this State to:

(4) Promote the recreational and educational potential of natural resources having scenic, open space, cultural, historical, geological, or biological values while ensuring that their inherent values are preserved

(5) Ensure opportunities for everyone to use and enjoy Hawai'i's recreational resources.

(10) Assure adequate access to significant natural and cultural resources in public ownership.

Discussion:
The proposed action will support the objectives and policies for socio-cultural advancement related to leisure.

The proposed project will maintain public beach and shoreline access for the guests and the community at large while promoting Hawai'i's natural resources in public ownership and providing recreational opportunities.

§226-25 Objective and policies for socio-cultural advancement--culture.

(a) Planning for the State's socio-cultural advancement with regard to culture shall be directed toward the achievement of the objective of enhancement of cultural identities, traditions, values, customs, and arts of Hawai'i's people.

(b) To achieve the culture objective, it shall be the policy of this State to:

(1) Foster increased knowledge and understanding of Hawai'i's ethnic and cultural heritages and the history of Hawai'i.

Discussion:
The proposed action will support the objectives and policies for socio-cultural advancement related to culture.

Today, a growing interest in sustainability has heightened public awareness of the applicability of traditional Hawaiian land use and cultural practices to modern economic activities. TBR has incorporated these aspects into their planning process to promote the proper management of the area's land and water resources. This innovative approach has been developed to guide TBR's renovations and improvements, focused on the maintenance and quality of the area's land, air, and water resources.

The proposed project will involve the erection of ahu (rock pedestals) about 4 to 5 feet high to mark the historical boundaries of the ahupua'a that run through the TBR property. These ahu are intended as a call back to / preservation of a design element considered an integral and functional part of Hawai'i's cultural heritage.

4.1.2 State Functional Plans

The Hawai'i State Plan directs appropriate State agencies to prepare Functional Plans which address Statewide needs, problems, and issues, and recommend policies and actions to mitigate those problems. The Functional Plans serve as guideposts for implementing the Hawai'i State Plan. Fourteen Functional Plans were prepared to implement the State Plan provisions in the areas of agriculture, transportation, conservation lands, education, tourism, water resources, energy, recreation, historic preservation, health, housing, higher education, employment, and human services. The

following presents a review of the Functional Plans that are applicable to the proposed project.

Tourism State Functional Plan (1991)

Goals of the Plan: *The 1991 State Tourism Functional Plan focused on six issues: (1) the positive and negative impacts of tourism growth on the community; (2) physical development in terms of product quality, product diversity, land use planning, adequate infrastructure, and visitor use of public services; (3) environmental resources and cultural heritage; (4) community, visitor, and industry relations; (5) employment and career development; and (6) effective marketing.*

The proposed project is consistent with the Tourism State Functional Plan.

The proposed project is intended to maintain and enhance the economic and market viability of TBR, and will serve to promote an optimal balance of economic, social, and cultural vitality at the resort while maintaining the rural and scenic character of the coastline for the enjoyment of the guests and community at large.

The proposed renovations will allow TBR to continue to operate as an economically sustainable resort and both preserve and enhance the direct and indirect employment opportunities as well as immediate and long-term economic benefits associated with its operation to the North Shore community, the island of O‘ahu, and the State of Hawai‘i, fulfilling the State and City and County’s desire to ensure the visitor industry benefits the quality of life of Hawai‘i’s residents.

The proposed project, in alignment with the Tourism State Functional Plan, will ensure that TBR continues to be a high-quality development that is unique to island of O‘ahu, as well as the State.

4.1.3 State Land Use District

The State Land Use Law, Chapter 205, HRS, is intended to preserve, protect and encourage the development of lands in the State for uses that are best suited to the public health and welfare of Hawaii's people. Under Chapter 205, HRS, all lands in the State of Hawaii are classified by the State Land Use Commission (LUC) into one of four major categories of State Land Use Districts. These districts are identified as the Urban District, Agricultural District, Conservation District, and Rural District. Permitted uses within the districts are prescribed under Title 12, Chapter 205 (Land Use Commission), HRS, and the State Land Use Commission’s Administrative Rules prescribed under Title 15, Subtitle 3, Chapter 15 HAR.

Sec. 205-2 Districting and classification of lands

a) There shall be four major land use districts in which all lands in the State shall be placed: urban rural, agricultural and conservation. The land use commission shall group contiguous land areas suitable for inclusion in one of these four major districts.

In establishing the boundaries of the districts in each county, the commission shall give consideration to the master plan or general plan of the county.

b) Urban districts shall include activities or uses as provided by ordinances or regulations of the county within which the urban district is situated.

Sec.15-15-24 Permissible uses within the "U" urban district. Any and all uses permitted by the counties, either by ordinances or rules may be allowed within this district, subject to any conditions imposed by the commission pursuant to Section 205-4, HR.

Discussion:
The project is situated within the State Land Use Urban District (See Figure 4-1). The proposed improvements are in conformance with the site's designation. Land uses in the Urban districts throughout the State are administered by the respective Counties in which they are located through their zoning codes. On O'ahu, the City & County of Honolulu, Department of Planning and Permitting (DPP) would generally administer zoning regulations under its Land Use Ordinance ROH, Chapter 21.

4.1.4 Hawai'i Coastal Zone Management Program

The National Coastal Zone Management (CZM) Program was created through passage of the Coastal Zone Management Act of 1972. Hawai'i's Coastal Zone Management (CZM) Program, established pursuant to Chapter 205A, HRS, as amended, is administered by the State Office of Planning (OP) and provides for the beneficial use, protection and development of the State's coastal zone. The objectives and policies of the Hawai'i CZM Program encompass broad concerns such as impact on recreational resources, historic and archaeological resources, coastal scenic resources and open space, coastal ecosystems, coastal hazards, and the management of development. The Hawai'i CZM area includes all lands within the State and the areas seaward to the extent of the State's management jurisdiction. Hence, the proposed project area is located in the CZM area. A discussion of the project's consistency with the objectives and policies of the CZM Program is provided 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
- *(i) Provide adequate, accessible, and diverse recreational opportunities in the coastal zone management area by: Protecting coastal resources uniquely suited for recreational activities that cannot be provided in other areas;*
- *(ii) 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;*
- *(iii) Providing and managing adequate public access, consistent with conservation of natural resources, to and along shorelines with recreational value;*

(iv) Providing an adequate supply of shoreline parks and other recreational facilities suitable for public recreation;

(v) 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; Adopting water quality standards and regulating point and nonpoint 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, and county authorities; and crediting such dedication against the requirements of section 46-6.

Discussion:

No short- or long-term significant impacts on surface and/or coastal waters in the project vicinity are anticipated during construction or operation of the proposed project. There are no streams or wetlands on or within close proximity to the project area. Applicable erosion control measures and best management practices will be implemented in order to mitigate any possible adverse effects relating to runoff. As applicable for each phase, these may include but are not be limited to: temporary sediment basins, temporary diversion berms and swales to intercept runoff, silt fences, dust fences, slope protection, stabilized construction vehicle entrance, grate inlet protection, truck wash down areas, and use of compost filter socks. Planting of landscaping also will be done as soon as possible on completed areas to help control erosion. Permanent sediment control measures will be used once construction is completed.

Coordination will be undertaken with the appropriate agencies during permitting and construction in order to ensure that the proposed project will not result in significant impacts with regard to surface and coastal waters. Soil disturbances in excess of one acre would require an NPDES Individual Permit for Storm Water Associated with Construction Activity, administered by the State DOH, will be required to control storm water discharges. Any discharges related to project construction or operation activities will comply with applicable State Water Quality Standards as specified in Hawai‘i Administrative Rules, Chapter 11-54 and 11-55 Water Pollution Control, Department of Health. Excavation and grading activities will be regulated by applicable provisions of the County’s grading ordinance.

(2) Historic Resources

Objective:

(A) 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.

Discussion:

A Supplemental Archaeological Inventory Study (SAIS) was conducted in 2013 in support of the Supplemental Environmental Impact Study (SEIS) for TBR. The SAIS fieldwork documented extensive disturbance that has occurred throughout the TBR properties. Land altering impacts to the TBR lands began with historic cultivation of sugarcane that occurred throughout the inland portions of TBR. Coastal areas where sand was unsuitable for cultivation and areas that were too wet in the vicinity of Punahoʻolapa Marsh were the focus of World War II-era development including the construction and use of the expansive Kahuku Army Airfield complex and the subsequent development of TBR and its golf course facilities.

The Burial Treatment Plan (BTP), Data Recovery Plan (DRP), and Archaeological Monitoring Plan (AMP) have been submitted to SHDP by ASM as mitigation plans. The BTP, which is the only plan currently approved, works to preserve and/or relocate human remains. The DRP provides guidance for the potential recovery of significant archaeological data and the AMP monitors and inspects development activities, which involve subsurface disturbance, for historical and/or archaeological remains.

The scope of the proposed project improvements is largely limited to renovation and replacement of existing facilities centralized to the Hotel complex, and largely limited to areas that have already been previously disturbed. Consequently, no significant impacts to historic resources are anticipated.

Nonetheless, should any archeological, cultural, or historic resources be found during construction activities, all work will cease and SHPD be notified immediately.

(3) Scenic and Open Space Resources

Objective:
(A) 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.

Discussion:

The proposed improvements are not anticipated to have significant impacts on notable view planes nor adversely affect important public viewing points or visual resources.

(4) Coastal Ecosystems

Objective:

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

Policies:

(A) Exercise an overall conservation ethic, and practice stewardship in the protection, use, and development of marine and coastal resources;

(B) Improve the technical basis for natural resource management;

(C) Preserve valuable coastal ecosystems, including reefs, of significant biological or economic importance;

(D) 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

(E) Promote water quantity and quality planning and management practices that reflect the tolerance of fresh water and marine ecosystems and maintain and enhance water quality through the development and implementation of point and nonpoint source water pollution control measures.

Discussion:

The nearest coastal water offshore of the project area is Kawela Bay, located immediately adjacent to TBR, to the northeast.

During construction of the proposed improvements, storm water runoff may carry increased amounts of sediment into the storm drain system due to erosion from soils exposed during excavation and drilling. This runoff could potentially impact the water quality of coastal waters in the area. However, excavation and drilling activities associated with the construction of the proposed project will be regulated by the County ordinances. In addition, any soil disturbances in excess of one acre would require an NPDES Individual Permit for Storm Water Associated with Construction Activity, administered by the State DOH, will be required to control storm water discharges. Mitigation measures will be instituted in accordance with site-specific assessments, incorporating appropriate structural and/or non-structural BMPs such as minimizing time of exposure between construction and landscaping, and implementing erosion control measures such as silt fences and sediment basins. Following the associated construction activity, the excavated areas will be paved over or backfilled to its graded contours or re-vegetated to control erosion.

Coordination will be undertaken with the appropriate agencies during permitting and construction in order to ensure that the proposed project will not result in significant impacts with regard to surface and coastal waters. A National Pollutant Discharge Elimination System (NPDES) permit for storm water runoff from construction activities would be required as individual and/or cumulative soil disturbances in the project area should it exceed one acre of land area. Any discharges related to project construction or

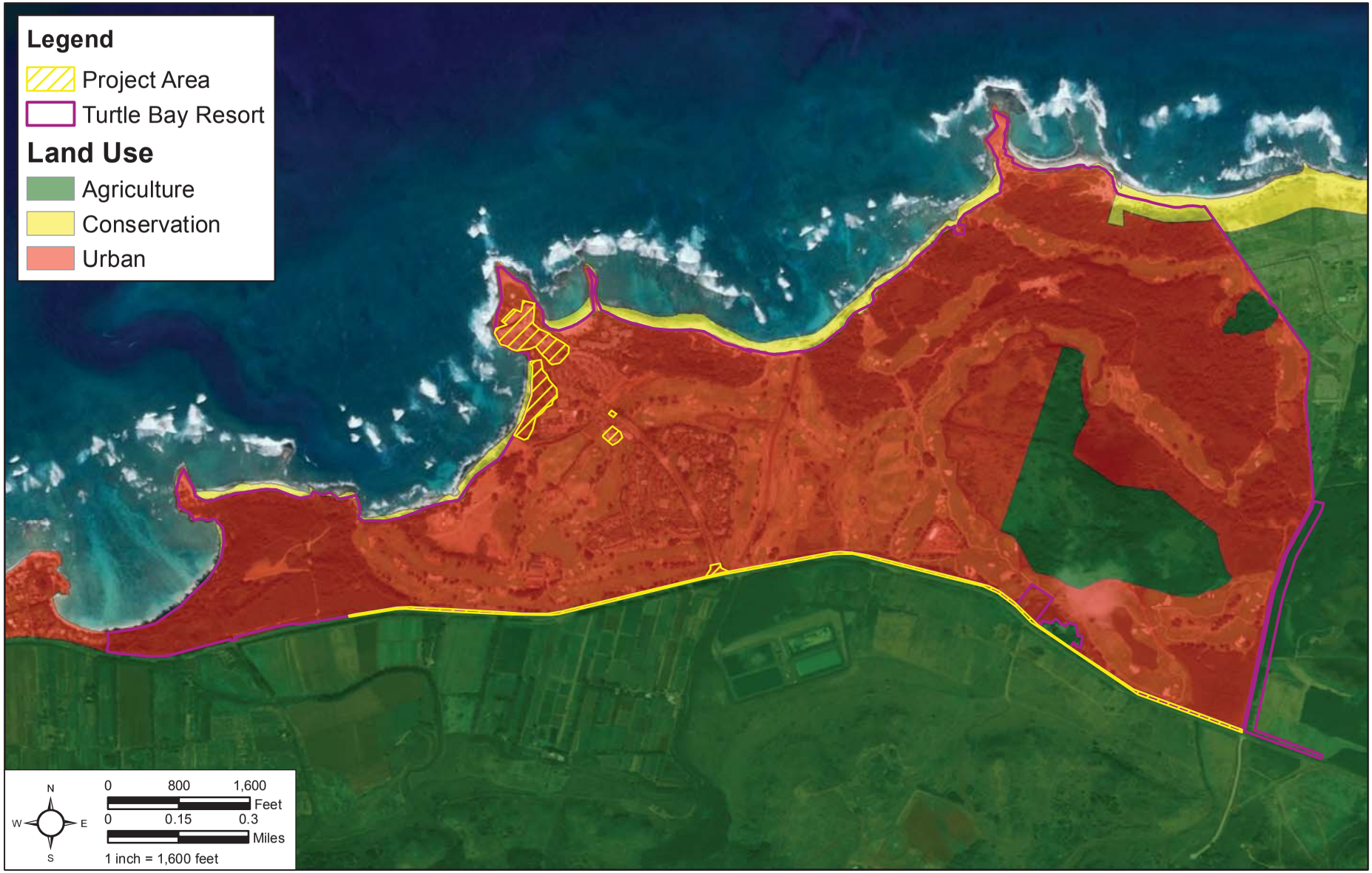

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FIGURE 4-1
STATE LAND USE DISTRICT MAP

TURTLE BAY RESORT HOTEL RENOVATION
KAHUKU, O'AHU, HAWAI'I

operation activities will comply with applicable State Water Quality Standards as specified in Hawai‘i Administrative Rules, Chapter 11-54 and 11-55 Water Pollution Control, Department of Health. Excavation and grading activities will be regulated by applicable provisions of the County’s grading ordinance.

(5) Economic Uses

Objective:

(A) 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.

Discussion:

In the short-term, construction expenditures will provide positive benefits to the local economy. This would include creation of some construction and construction support jobs, and the purchase of materials from local suppliers, as well as indirect benefits to local retail businesses resulting from construction activities.

In the long-term, the proposed project will maintain TBR as an economically sustainable resort and residential development with direct and indirect employment opportunities, as well as providing long-term economic benefits to the North Shore community, the island of O‘ahu, and the State of Hawai‘i.

(6) Coastal Hazards

Objectives:

(A) 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;

(B) Ensure that developments comply with requirements of the Federal Flood Insurance Program;
(C) Prevent coastal flooding from inland projects.

Discussion:
According to the *Flood Insurance Rate Maps* prepared by the Federal Emergency Management Agency, the project area is designated Zone X. Zone X includes areas subject to 500-year floods, areas of 100-year floods with average depths of less than 1-foot, or areas with drainage areas less than 1 square mile.

According to the Tsunami Evacuation Zone maps for O'ahu, the project area lies within the tsunami evacuation zone.

Construction and operation of the proposed improvements are not anticipated to increase flood risks or cause any adverse flood-related impacts at the project area or lower elevation properties.

(7) Managing Development

Objective:
(A) 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 or 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.

Discussion:
The Hawai'i State environmental review process, HRS 343, requires project review by government agencies and affords the public the opportunity to provide comments on the proposed project. The proposed improvements are also subject to the State Special Management Area (SMA) permit process as discussed in Section 4.1.5. Applicable State and County requirements will be adhered to in the design and construction phases of the proposed improvements.

Certain elements of the proposed project will require approval of a Shoreline Management Area (SMA) Use Permit (SMP) by the City and County of Honolulu Department of Planning and Permitting (DPP) as several of the proposed improvements constitute some level of "development" within the SMA as defined in Chapter 25, Revised Ordinances of Honolulu (ROH), while several of the proposed improvements are not "development" and are thus exempt and do not require an SMP. This Environmental Assessment (EA) is being prepared in support of the forthcoming SMP application required for the implementation of the certain elements of the project pursuant to ROH Section 25-3.3(c)(1) and in accordance with Chapter 343, Hawai'i Revised Statutes (HRS) and Title 11, Chapter 200, Hawai'i Administrative Rules (HAR), Department of Health, State of Hawai'i.

The improvements listed within Chapter 2 constitute "development" pursuant to Chapter 25, ROH, and are subject to SMA permit requirements. The SMA exempt / non-exempt status of the improvements associated with the proposed action is further detailed in documentation provided herein as Appendix C.

(8) Public Participation

Objective:
(A) Stimulate public awareness, education, and participation in coastal management.

Policies:
(A) Promote public involvement in coastal zone management processes;
(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 issues, developments, and government activities; and
(C) Organize workshops, policy dialogues, and site-specific mediations to respond to coastal issues and conflicts.

Discussion:
This EA document is being prepared pursuant to the guidelines established under Chapter 25, Revised Ordinances of Honolulu (ROH), which provides opportunities for project review by government agencies and affords the public the opportunity to provide comments on the proposed project. The proposed project will also require a Special Management Area permit that will evaluate its consistency with the CZM objectives and policies and require a public hearing.

(9) Beach Protection

Objective:
(A) Protect beaches for public use and recreation.

Policies:
(A) Locate new structures inland from the shoreline setback to conserve open space, minimize interference with natural shoreline processes, and 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.

Discussion:
Implementation of the proposed project improvements will not require the installation of any shoreline erosion-protection structures.

(10) *Marine Resources*

Objective:

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

Policies:

(D) *Ensure that the use and development of marine and coastal resources are ecologically and environmentally sound and economically beneficial;*

(E) *Coordinate the management of marine and coastal resources and activities to improve effectiveness and efficiency;*

(F) *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;*

(G) *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*

(H) *Encourage research and development of new, innovative technologies for exploring, using, or protecting marine and coastal resources.*

Discussion:

The proposed improvements do not involve construction or development within coastal waters and are, therefore, not anticipated to have any direct impacts on marine and coastal resources.

No short- or long-term significant impacts on surface and/or coastal waters in the project vicinity are anticipated during construction or operation of the proposed project. Construction of the proposed project will not involve major land disturbing activities. Applicable erosion control measures and best management practices will be implemented in order to mitigate any possible adverse effects relating to runoff. As applicable for each phase, these may include but are not be limited to: temporary sediment basins, temporary diversion berms and swales to intercept runoff, silt fences, dust fences, slope protection, stabilized construction vehicle entrance, grate inlet protection, truck wash down areas, and use of compost filter socks. Planting of landscaping also will be done as soon as possible on completed areas to help control erosion. Permanent sediment control measures will be used once construction is completed.

Coordination will be undertaken with the appropriate agencies during permitting and construction in order to ensure that the proposed project will not result in significant impacts with regard to surface and coastal waters. A National Pollutant Discharge Elimination System (NPDES) permit for storm water runoff from construction activities would be required as individual and/or cumulative soil disturbances on the project area will exceed one acre of land area. Any discharges related to project construction or operation activities will comply with applicable State Water Quality Standards as specified in Hawai‘i Administrative Rules, Chapter 11-54 and 11-55 Water Pollution Control, Department of Health. Excavation and grading activities will be regulated by applicable provisions of the County’s grading ordinance.

No listed or protected plant species are known from the project area. Rare, threatened, or endangered fauna are not known to utilize the site for either habitat or foraging purposes. No adverse impacts resulting from the project are anticipated. However, to prevent adverse effects to protected seabirds from night lighting, the project will comply with the requirements set forth by Chapter 201-8.5 of the Hawai‘i Revised Statutes.

4.1.5 Special Management Area Designation

Pursuant to the Hawaii CZM Program, Chapter 205A, HRS, the counties have enacted ordinances establishing their respective Special Management Areas (SMA). The City and County of Honolulu enacted its SMA ordinance as Chapter 25, Revised Ordinances of Honolulu. Any “development” within its geographically defined SMA requires an SMA Use Permit. The proposed project are lies entirely within the SMA (See Figure 4-1 Special Management Area Map).

SPECIAL MANAGEMENT AREA USE PERMIT (SMP):

Certain elements of the proposed project will require approval of a Shoreline Management Area (SMA) Use Permit (SMP) by the City and County of Honolulu Department of Planning and Permitting (DPP) as several of the proposed improvements constitute some level of “development” within the SMA as defined in Chapter 25, Revised Ordinances of Honolulu (ROH), while several of the proposed improvements are not “development” and are thus exempt and do not require an SMP. This Environmental Assessment (EA) is being prepared in support of the forthcoming SMP application required for the implementation of the certain elements of the project pursuant to ROH Section 25-3.3(c)(1) and in accordance with Chapter 343, Hawai‘i Revised Statutes (HRS) and Title 11, Chapter 200, Hawai‘i Administrative Rules (HAR), Department of Health, State of Hawai‘i.

The improvements listed within Chapter 2 constitute “development” pursuant to Chapter 25, ROH, and are subject to SMA permit requirements. The SMA exempt / non-exempt status of the improvements associated with the proposed action is further detailed in documentation provided herein as Appendix C.

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FIGURE 4-2
SPECIAL MANAGEMENT AREA MAP

TURTLE BAY RESORT HOTEL RENOVATION
KAHUKU, O'AHU, HAWAI'I

4.2 City and County of Honolulu Land Use Plans and Policies

The City and County of Honolulu last updated its General Plan (1992 edition) in October 2002. The General plan is intended to be a dynamic document, expressing the aspirations of the residents of Oahu. It sets forth the long-range objectives and policies for the general welfare and, together with the regional development plans, provides a direction and framework to guide the programs and activities of the City and County of Honolulu. It is a written commitment by the City and County government to a future for the Island of O'ahu that it considers desirable and attainable. The Plan is a two-fold document: First, it is a statement of the long-range social, economic, environmental, and design objectives for the general welfare and prosperity of the people of O'ahu. These objectives contain both statements of desirable conditions to be sought over the long run and statements of desirable conditions that can be achieved within an approximately 20-year time horizon. Second, the General Plan is a statement of broad policies that facilitate the attainment of the objectives of the Plan.

The General Plan is a guide for all levels of government, private enterprise, neighborhood and citizen groups, organizations, and individual citizens in eleven areas of concern:

(1) Population;
(2) Economic Activity;
(3) Natural Environment;
(4) Housing;
(5) Transportation and utilities;
(6) Energy;
(7) Physical development and urban design;
(8) Public safety;
(9) Health and Education;
(10) Culture and recreation; and
(11) Government operations and fiscal management.

The proposed project is relevant and consistent with the following applicable goals, objectives, policies, and actions of the *City and County of Honolulu General Plan*:

II. Economic Activity

Objective A
To promote employment opportunities that will enable all the people of O'ahu to attain a decent standard of living.

Policy 1
Encourage the growth and diversification of O'ahu's economic base.

Discussion:
The proposed project is intended to maintain and enhance the economic and market viability of TBR, and will serve to promote an optimal balance of economic, social, and cultural vitality at the resort while maintaining the rural and scenic character of the coastline for the enjoyment of the guests and community at large.

Specifically, the proposed project will contribute to the State's economy by providing:

- Short-term employment opportunities associated with the renovations and construction of the proposed project improvements
- Long-term employment opportunities associated with the TBR operations, as well as renovations to and maintenance of the TBR improvements and renovations

Objective B
To maintain the viability of O'ahu's visitor industry.

Policy 6
Permit the development of secondary resort areas in West Beach, Kahuku, Makaha, and Laie

Policy 7
Manage the development of secondary resort areas in a manner which respects existing lifestyles and the natural environment, and avoids substantial increases in the cost of providing public services in the area.

Policy 8
Preserve the well-known and widely publicized beauty of O'ahu for visitors as well as residents.

Policy 9
Encourage the visitor industry to provide a high level of service to visitors.

Discussion:
The proposed project will maintain and enhance TBR as a sustainable resort and residential development that will continue to provide direct and indirect employment opportunities and provide immediate and long-term economic benefits to the North Shore community, the island of O'ahu, and the State of Hawai'i. The proposed improvements are a necessary part of the ongoing contribution of TBR to the economy and continue to provide a valuable experience for its guests.

The proposed project falls within the limits of existing developed footprints. Project improvements will include improvements to the existing hotel and its ancillary facilities. Refurbishments include repairs to the main hotel building, interior and exterior improvements, reconfiguration of the pool and recreational areas, and establishment of public shoreline access in compliance with land use entitlements.

III. Natural Environment

Objective A
To protect and preserve the natural environment

Policy 1

Protect O'ahu's natural environment, especially the shoreline, valleys, and ridges, from incompatible development

Policy 4
Require developmental projects to give due consideration to natural features such as slope, flood, and erosion hazards, water-recharge areas, distinctive land forms, and existing vegetation.

Discussion:
The proposed project falls within the limits of existing developed footprints. Project improvements will include improvements to the existing hotel and its ancillary facilities. Refurbishments include repairs to the main hotel building, interior and exterior improvements, reconfiguration of the pool and recreational areas, and establishment of public shoreline access in compliance with land use entitlements.

Construction BMPs will be utilized in compliance with City and County ordinances pertaining to grading, grubbing, stockpiling, soil erosion, and sedimentation during construction. BMPs will also be implemented for long-term development and operation of activities occurring on the site as part of pollution prevention measures.

Objective B
To preserve and enhance the natural monuments and scenic views of O'ahu for the benefit of both the residents and visitors.

Policy 4
Provide opportunities for recreational and educational use and physical contact with O'ahu's natural environment.

Discussion:
The proposed project will maintain public beach and shoreline access for the guests and the community at large, serving to promote Hawai'i's natural resources in public ownership and provide recreational opportunities.

X. Culture and Recreation

Objective B
To protect O'ahu's cultural, historic, architectural, and archaeological resources.

Policy 1
Encourage the restoration and preservation of early Hawaiian structures, artifacts, and landmarks.

Discussion:
The proposed project will involve the erection of ahu (rock pedestals) about 4 to 5 feet high to mark the historical boundaries of the ahupua'a that run through the TBR property. These ahu are

intended as a call back to / preservation of a design element considered an integral and functional part of Hawai‘i’s cultural heritage.

Objective D
To provide a wide range of recreational facilities and services that are readily available to all residents of O‘ahu.

Policy 6
Provide convenient access to all beaches and inland recreation areas.

Policy 12
Provide for safe and secure use of public parks, beaches and recreation facilities.

Discussion:
The proposed project will maintain public beach and shoreline access for the guests and the community at large, serving to promote Hawai‘i’s natural resources in public ownership and provide recreational opportunities.

4.2.1 Ko‘olau Loa Sustainable Communities Plan (1999)

The project site is located within the Ko‘olau Loa Development Plan (DP) area, the northeastern district of O‘ahu, which extends from Waimea Bay on the North Shore to Ka‘a‘awa on the windward coast.

Ko‘olau Loa is characterized as an uncrowded rural area. The rural character of this region and its cultural and agricultural history are reminiscent of “old Hawai‘i”. The vision of the Ko‘olau Loa Sustainable Communities Plan is to maintain and enhance the man-made and natural elements that make Ko‘olau Loa’s rural character so unique and special. The development plan is currently being updated and was approved by the Planning Commission on April 3, 2013.

3. Land Use Policies, Principles, and Guidelines

3.1 Open Space Preservation
3.1.1 General Policies

- *Maintain the region’s rural character, protect scenic views, and provide recreational resources*

Discussion:
The proposed project will improve and establish public beach and shoreline access for the guests and the community at large promoting Hawai‘i’s natural resources in public ownership and providing recreational opportunities.

3.4 Historic and Cultural Resources
3.4.2 General Policies

- *Protect existing visual landmarks and support the creation of new, culturally appropriate landmarks at ahupua‘a boundaries*

Discussion:
The proposed project will involve the erection of ahu (rock pedestals) about 4 to 5 feet high to mark the historical boundaries of the ahupua‘a that run through the TBR property. These ahu are intended as a call back to / preservation of a design element considered an integral and functional part of Hawai‘i’s cultural heritage.

3.8 Visitor Facilities

3.8.1.1 General Policies

- *Plans to establish a major resort destination at Kuilima should be maintained. It will provide a major source of jobs for Ko‘olau Loa and North Shore residents, significantly improve shoreline access and use of opportunities for residents, and include other amenities that can be enjoyed by residents and visitors alike*

Discussion:
The proposed project encompasses a range of much needed renovations to the existing Turtle Bay Hotel and various facilities that support the hotel operations. The proposed renovations are intended to maintain the range and quality of resort amenities and enhance the overall guest experience at the resort. Moreover, the context and character of the proposed renovations are consistent with land use plans, policies, and controls and would not be detrimental to the overall appearance or aesthetics of the surrounding region.

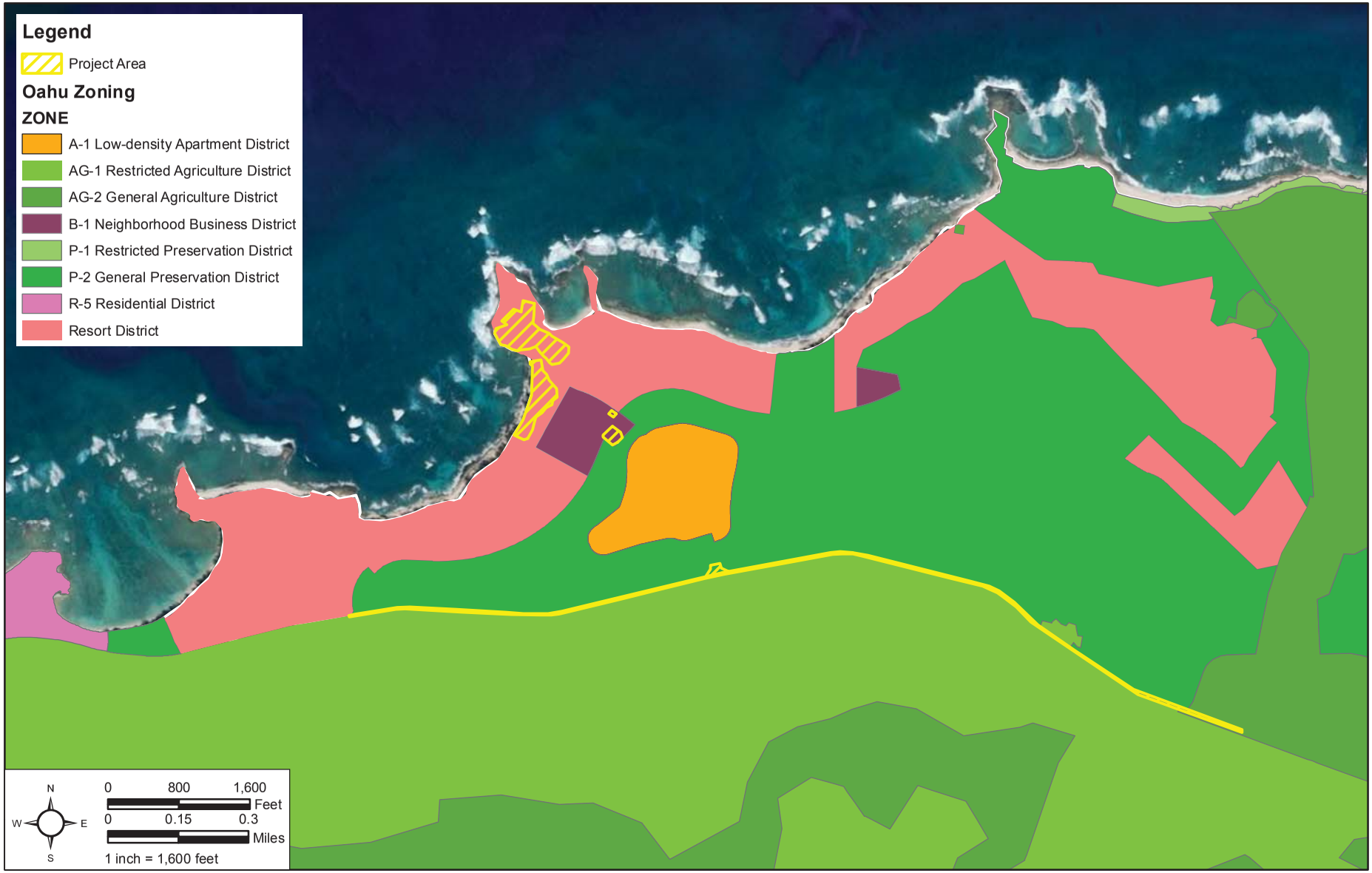
The proposed project is intended to maintain and enhance the economic and market viability of TBR, and will serve to promote an optimal balance of economic, social, and cultural vitality at the resort while maintaining the rural and scenic character of the coastline for the enjoyment of the guests and community at large.

The proposed renovations will allow TBR to continue to operate as an economically sustainable resort and both preserve and enhance the direct and indirect employment opportunities as well as immediate and long-term economic benefits associated with its operation to the North Shore community, the island of O‘ahu, and the State of Hawai‘i.

4.2.2 City and County of Honolulu Zoning

The purpose and intent of the City and County of Honolulu Land Use Ordinance (LUO) is to regulate land use in a manner that will encourage orderly development in accordance with adopted land use policies, including the O‘ahu General Plan and development plans, and to promote and protect the public health, safety and welfare.

Discussion:
According to the City and County of Honolulu Department of Planning and Permitting (DPP), the project area lies within City and County’s Resort, Business (B-1), Preservation (P-1 & P-2), and Agriculture (A-2) Zoning Designations (See Figure 4-3). On O‘ahu, DPP administers the zoning regulation for the City and County of Honolulu under its Land Use Ordinance (LUO), ROH, Chapter 21. The proposed project improvements are consistent with the City and County’s LUO.



WILSON OKAMOTO CORPORATION
ENGINEERS | PLANNERS | CONSULTANTS

FIGURE 4-3
CITY AND COUNTY OF HONOLULU ZONING MAP

TURTLE BAY RESORT HOTEL RENOVATION
KAHUKU, O'AHU, HAWAI'I

4.3 Permits and Approvals

The following is a list of permits and approvals that may be required prior to the construction and development of the proposed project. It should be noted that additional permits and approvals not listed here may be required. The need for those permits and approvals may surface as a result of further, ongoing coordination with government agencies.

Federal

U.S. Fish and Wildlife Service

- Consultation Pursuant to the Endangered Species Act

State of Hawaii

Department of Land and Natural Resources

- Chapter 6E, HRS, State Historic Preservation Law

Department of Health

- National Pollutant Discharge Elimination System
- Disability and Communication Access Board
- Pollution Control – Noise Permit
- Water Quality

City and County of Honolulu

Department of Planning and Permitting

- Special Management Area Permit
- Flood Development Permit
- Subdivision Approval
- Shoreline Certification
- Building Permit
- Grading Permit/Trenching Permit
- Certificate of Occupancy
- Construction Dewatering
- Wastewater Sewer Connection
- Stormwater Drain Connection
- Excavation and Repair of Streets and Sidewalks

Board of Water Supply

- Water Connection

Department of Transportation

- Street Usage Permit

Honolulu Fire Department

- Plan Review

5. ALTERNATIVES

Hawai‘i Administrative Rules (HAR) § 11-200-10 (1996) requires an environmental assessment to identify and consider alternatives to the proposed action.

5.1 No Action Alternative

Under the No Action Alternative, the improvements proposed under the subject TBR Improvements Project would not be constructed, and TBR would remain in its present condition.

The no-action alternative would preclude permit approvals, as well as costs for design and construction which would otherwise be required for the proposed project improvements.

Under the No-Action Alternative, much needed renovations to the existing hotel and improvements to various support facilities intended to maintain the range and quality of amenities and enhance the overall guest experience at the resort would not be implemented. This would compromise the short- and long-term viability of resort operations, and result in adverse impacts to the ability of the resort to contribute on both a direct and indirect basis to the local economy.

In observance of the above, the No Action Alternative would fail to satisfy the purpose and need of the proposed action, is not a feasible alternative, and was eliminated from further consideration.

5.2 Other Alternatives

The most recent renovations to the Turtle Bay Hotel were carried out between 2012 – 2014. The scope of that effort included renovations to the lobby, food and beverage establishments, guestrooms, main pool, pool bar, cottages, and to various landscape around the property. The cart barn was also repaired after a fire that occurred in 2015.

Other alternatives outside of the proposed action and the no action alternative were considered throughout planning and design efforts associated with the subject project.

From an architectural and land planning/programming standpoint, alternative design schemes and site configurations were studied and considered under the scope of the proposed action, however, the proposed design scheme was selected to serve as the basis of impact assessment for the purposes of the EA process.

Pursuant the design and development process, TBR has considered other options for exterior modifications to the envelope along the west facing windows and openings of the resort. Much like the proposed design which presents the option to open up the west façade of the lobby with moveable Nanawall systems, concepts to fully expand the exterior openings for Kula Grille and Pa‘akai food and beverage outlets were also considered. These openings face strong winds on a regular basis and would require additional structure and wind screens for pedestrian comfort. Due to the additional structural needs for more coverage from the elements and the possibly of blocking interior views out to the ocean, these plans eliminated from further study, however it should be noted that under the proposed action, these storefronts will be renovated. Alternative interior renovations for corridors, ballrooms, conference rooms, retail spaces and the spa and fitness center were also considered. Due to budgetary concerns, however, further study of such efforts have been postponed. In general, the design of proposed project improvements are in response to existing failing structural and aging finish material conditions.

As the intended purpose and need of the proposed action is centered on maintaining the range and quality of amenities and the enhancement of the overall guest experience at TBR, the consideration of alternative locations for the proposed project improvements is inherently constrained by the location and nature of existing uses present on-site.

The proposed action is the direct result of the natural evolution of design/planning efforts for the subject project, and reflects a design proposal that would comprehensively address the intended purpose and need of the project in question while factoring in all of the various inherent design constraints are typical of a project centered around renovation/enhancement of an existing use.

6. ANTICIPATED DETERMINATION OF FONSI

Potential impacts of the proposed improvements have been evaluated in accordance with the significance criteria of Section 11-200-12 of the Department of Health's Administrative Rules. Discussion of the project's conformance to the criteria is presented as follows:

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

The construction, demolition and/or replacement of structures within the property is not expected to result in significant impacts to the surrounding natural resources. All of the improvements listed under Proposed Project Developments of Chapter 2 are within the existing TBR site, which is comprised of already-developed lands with no significant natural resources.

The only notable construction activities that may potentially affect nearby bodies of water close to the project site are limited to those associated with the proposed reflecting pond and garden, and the new linear pool near the existing beach cottages. It should be noted that these improvements are located outside of shoreline setback area, which would limit any risk of loss or destruction to water resources.

(2) Curtails the range of beneficial uses of the environment;

Since the proposed action centers entirely on improvements to existing resort amenities and facilities, it will not curtail the beneficial uses of the environment.

(3) Conflicts 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;

No conflicts to the long-term state's environmental policies and guidelines are anticipated as no major changes to the current condition of the project site are proposed, Further, it should be underscored that that although impacts due to short-term construction activities are anticipated, mitigation measures to limit and/or counter those impacts will be implemented at all times. In addition, the proposed renovations will enhance the range and quality of attractions, venues, and uses that are consistent with State and County land use plans, policies, and controls.

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

In the short term, construction expenditures will provide positive economic benefits to the State and Local economy. These positive impacts would be characterized by the creation of some construction and construction support jobs, and the purchase of materials from local suppliers, as well as indirect benefits to local retail businesses resulting from construction activities, but not at a level that would generate any significant population expansion.

On a long-term basis, the proposed renovations will allow TBR to continue to operate as an economically sustainable resort and both preserve and enhance the direct and indirect employment opportunities as well as immediate and long-term economic

benefits associated with its operation to the North Shore community, the island of O'ahu, and the State of Hawai'i.

(5) Substantially affects public health;

No significant adverse short- or long-term impacts on public-health are anticipated to result from the construction and operation of the proposed improvements. Typical short-term construction- related impacts (air, land and water quality, and noise) are anticipated, but temporary in nature. Standard construction and permanent best management practices will be implemented by the contractor to mitigate substantial impacts on public health.

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

Although part of the proposal is repair and maintenance of the chain link fence and the installation of the rock pedestals along the Kamehameha Highway, these construction activities are not anticipated to create substantial impact on the ROW.

Also, no increase in population is expected since the maximum number of the guests that can be accommodated will remain the same since the proposed works are not involved in constructing additional units. In consultation with DOT, traffic control plans during special events will be implemented as necessary.

(7) Involves a substantial degradation of environmental quality;

Impacts due to short-term construction are anticipated but, mitigation measures are expected to be implemented at all times. No substantial degradation of the environmental quality (air, land and water quality, and noise) is anticipated since the proposed improvements are located in areas that have already been fully developed.

(8) Is individually limited but cumulatively has considerable effect upon the environment or involves a commitment for larger actions;

The proposed action will not result in considerable impacts to the proposed improvements are localized to areas that have already been fully developed. There are no commitments for further action beyond the scope presented within this EA, however it is acknowledged that the proposed infrastructure improvements are intended to support potential future development efforts, which are still being studied.

(9) Substantially affects a rare, threatened, or endangered species, or its habitat;

The proposed action is not anticipated to result in the destruction or loss of any significant, endangered, or threatened botanical, faunal, geological, or other natural resources within the project site. Nonetheless, it is acknowledged the existence of nearby identified Critical Habitat (James Campbell National Wildlife Refuge) and Supporting Habitat (Punaho'olapa Marsh and Kuilima Wastewater Treatment Plant setting ponds).

(10) Detrimentally affects air or water quality or ambient noise levels;

In the short-term, construction activities will result in unavoidable impacts to ambient noise levels within the vicinity of project construction and development act. This increase in noise levels will vary according to the particular phase of construction. Noise may also increase as a result of operating power equipment during the construction period.

Construction noise impacts will be mitigated by compliance with provisions of the State DOH Administrative Rules, Title 11, Chapter 46, "Community Noise Control" regulations. These rules require a noise permit if the noise levels from construction activities are expected to exceed the allowable levels stated in the DOH Administrative Rules. It shall be the contractor's responsibility to minimize noise by properly maintaining noise mufflers and other noise-attenuating equipment, and to maintain noise levels within regulatory limits.

In the long-term, no significant noise impacts are anticipated once the construction of the proposed improvements has been completed. Since the project is not expected to significantly increase roadway capacity or travel demand, ambient noise levels in the vicinity attributable to the project should not change significantly.

Project demolition and construction activities will comply with the Federal, State and County regulations to minimize the negative effects to air and water quality.

Even though some of the improvements within the project site is near the Pacific Ocean, however, those are identified to be outside the shoreline setback. Appropriate best management practices will be implemented to minimize and/or avoid negative effects concerning water quality through runoff generated within the area.

(11) Affects 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;

Pursuant to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), Community Panel No: 15003C0030G dated January 19, 2011, shows that the project site is located in Zone VE, "*Coastal flood zone with velocity hazard (wave action).*" Base flood elevation is determined as 17 ft.

The project site is within the tsunami evacuation zone as seen on the Oahu's Tsunami Evacuation Map. Moreover, all renovations will comply with City flood ordinances. No lowering of existing ground floor levels is proposed.

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

The proposed action will not result in significant impacts to view planes since the renovations will be implemented for an existing developed area. By contrast, the renovations will enhance mauka to makai view planes through site orientation and placement of built features.

(13) Requires substantial energy consumption.

The construction and operation of the proposed improvements will not require a significant level of energy consumption. By contrast, the emphasis and use of green, energy efficient fixtures, features and operational procedures will limit the energy demands of the project.

7. CONSULTATION

7.1 Pre-Assessment Consultation

The following agencies and organizations were consulted during the EA Pre-Assessment Consultation Process. Consultation was conducted to solicit comments regarding potential concerns and requirements pursuant to refining the scope of EA documentation. Parties that formally replied during the pre-assessment period, are indicated by a "X" below. All comments are reproduced and included herein as Appendix A.

Federal Agencies

- National Oceanic and Atmospheric Administration, Pacific Islands Regional Office
- U.S. Army Corps of Engineers
- X U.S. Department of the Interior, Fish and Wildlife Service

State Agencies

- X Department of Accounting and General Services
- Department of Business, Economic Development and Tourism
- Department of Business, Economic Development and Tourism, Land Use Commission
- Department of Business, Economic Development and Tourism, Office of Planning
- Department of Hawaiian Homelands
- X Department of Health
- Department of Health, Clean Water Branch
- Department of Health, Office of Environmental Quality Control
- Department of Health, Environmental Management Division
- Department of Health, Hazard Evaluation and Emergency Response Office
- Department of Land and Natural Resources
- Department of Land and Natural Resources, Historic Preservation Division
- X Department of Land and Natural Resources, Office of Conservation and Coastal Lands
- X Department of Transportation
- X Office of Planning
- Hawai'i Community Development Authority
- Senator Gil Riviere, Senate District 23
- Representative Sean Quinlan, House District 47

City and County of Honolulu Agencies

- X Board of Water Supply
- Department of Community Services
- X Department of Design and Construction
- Department of Environmental Services
- X Department of Facility Maintenance
- X Department of Parks and Recreation
- Department of Planning and Permitting
- Department of Transportation Services
- Office of the Mayor
- X Honolulu Fire Department
- X Honolulu Police Department
- Council Chair Ann Kobayashi
- Council Member Heidi Tsuneyoshi, District 2

Neighborhood Board

Chair Kathleen Pahinui, North Shore Neighborhood Board No. 27
Chair DeeDeeLetts, Koʻolauloa Neighborhood Board No. 28

Utility Companies

X Hawaiʻi Gas
Hawaiian Electric Company, Inc.
Hawaiian Telcom
Spectrum Hawaii

Other Interested Parties and Individuals

Christ Tatum, Hawaiʻi Tourism Authority
Lucky Cole, Keep the North Shore Country
Denise Antolini, Koʻolauloa North Shore Alliance
Doug Cole, North Shore Community Land Trust
Lea Hong, Trust for Public Land
Adam Borello, North Shore Community Land Trust
X Bill Quinlan, North Shore Chamber of Commerce
Jennifer Yagodichi, Malama Pūpūkea Waimea
X Verla Moore, Lāʻie Community Member
Dotty Kelly-Paddock, Hauʻula Community Member
Bob Leinau, North Shore Neighborhood Board
X MaryAnne Long, Hauʻula Community Member
Joseph Kalili, Hauʻula Community Member
Junior Primacio, Lāʻie Community Member
Sarah Cadiz, Sunset Community Member
Pane Meatoga III, Koʻolauloa Neighborhood Board
Cord Anderson, Pūpūkea Community Member
X Race Randle, Kahuku Community Member
Ken Furukawa, Hauʻula Community Association

8. REFERENCES

State of Hawaii Planning and Economic Development, *Hawaii Revised Statutes Title 13 Planning and Economic Development Chapter 226, Hawaii State Planning Act*.

State of Hawaii Planning and Economic Development, *Hawaii Revised Statutes Title 13 Planning and Economic Development Chapter 205, Land Use Commission.*

State of Hawaii Department of Health, *Hawaii Administrative Rules Title 11 Department of Health Chapter 46, Community Noise Control*.

State of Hawaii Department of Land and Natural Resources*, Hawaii Administrative Rules Title 13 Department of Land and Natural Resources Chapter 276, Rules Governing Standards for Archaeological Inventory Surveys and Reports*, October 31, 2002.

State of Hawaii Department of Business, Economic Development and Tourism*, Hawaii Administrative Rules Title 15 Department of Business, Economic Development and Tourism Chapter 15, Land Use Commission Rules*, amended and compiled 2018.

City and County of Honolulu, Department of Planning and Permitting, *Ko'olau Loa Sustainable Communities Plan*, October 1999.

City and County of Honolulu, Department of Planning and Permitting: http://www.honoluludpp.org/Planning/DevelopmentSustainableCommunitiesPlans/KoolauloaPlan.aspx

State of Hawaii Department of Business, Economic Development and Tourism, Census: http://census.hawaii.gov/acs/acs-2017/

Sichter, Lee, et. al. *Final Supplemental Environmental Impact Statement for Turtle Bay Resort Expansion, Volume 1,* July 2013.

Sichter, Lee, et. al. *Final Supplemental Environmental Impact Statement for Turtle Bay Resort Expansion, Volume 4,* July 2013.

Takasaki, K.J., Mink, J.F., Evaluation of Major Dike Impounded Groundwater Reservoirs, Island of Oahu, *USGS,* Water Supply Paper 2217.

APPENDIX A:

Pre-Assessment Consultation
Comment Letters & Responses

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843
www.boardofwatersupply.com

May 9, 2019

KIRK CALDWELL, MAYOR

BRYAN P. ANDAYA, Chair
KAPUA SPROAT, Vice Chair
KAY C. MATSUI
RAY C. SOON
MAX J. SWORD

ROSS S. SASAMURA, Ex-Officio
JADE T. BUTAY, Ex-Officio

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

ELLEN E. KITAMURA, P.E.
Deputy Manager and Chief Engineer

Mr. Earl Matsukawa, AICP, Project Manager
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

RECEIVED
MAY 13 2019
WILSON OKAMOTO CORPORATION

Dear Mr. Matsukawa:

Subject: Your Letter Dated April 12, 2019 Requesting Comments on the Draft Environmental Assessment Pre-Assessment Consultation for the Proposed Turtle Bay Resort Hotel Renovation in Kahuku - Tax Map Key: 5-6-003: 002, 003, 043, 054, 061, 062; 5-7-001: 043, 046, 047, 052, 053, 054, 055, 056; 5-7-006: 028, 030

Thank you for your letter regarding the proposed hotel renovation project.

The existing water system is adequate to accommodate the water demands and off-site fire protection to the proposed hotel renovation project. However, please be advised that this information is based upon current data, and therefore, the Board of Water Supply reserves the right to change any position or information stated herein up until the final approval of the building permit application. The final decision on the availability of water will be confirmed when the building permit application is submitted for approval.

Water conservation measures are recommended for all proposed developments. These measures include utilization of nonpotable water for irrigation using rain catchment, drought tolerant plants, xeriscape landscaping, efficient irrigation systems, such as a drip system and moisture sensors, and the use of Water Sense labeled ultra-low flow water fixtures and toilets.

The on-site fire protection requirements should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.

If you have any questions, please contact Robert Chun, Project Review Branch of our Water Resources Division at 748-5443.

Very truly yours,

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10393-06
June 12, 2019

Mr. Ernest Lau, P.E.
Manager and Chief Engineer
City and County of Honolulu
Board of Water Supply
630 South Beretania Street
Honolulu, HI 96843

Subject: Environmental Assessment (EA) Pre-Assessment Consultation
Turtle Bay Resort Hotel Renovation
Tax Map Keys (TMK): 5-6-003: 002, 003, 043, 054, 061, 062; 5-7-001: 043, 046, 047, 052, 053, 054, 055, 056; 5-7-006: 028, 030
Kahuku, O'ahu, Hawai'i

Dear Mr. Lau:

Thank you for your letter dated May 9, 2019 regarding the subject Environmental Assessment (EA) Pre-Assessment Consultation.

The scope of your comments is acknowledged and will be incorporated into the EA process moving forward.

Your letter, along with this response, will be reproduced and included in the forthcoming Draft EA.

We appreciate your participation in the EA Pre-Assessment Consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Jim Kwasnowski, BRE Turtle Bay Resort, LLC

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 11TH FLOOR
HONOLULU, HAWAII 96813
Phone: (808) 768-8480 • Fax: (808) 768-4567
Web site: www.honolulu.gov

KIRK CALDWELL
MAYOR

ROBERT J. KRONING, P.E.
DIRECTOR

MARK YONAMINE, P.E.
DEPUTY DIRECTOR

April 29, 2019

RECEIVED
MAY 06 2019
WILSON OKAMOTO CORPORATION

Wilson Okamoto Corporation
ATTN: Earl Matsukawa
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Matsukawa,

Subject: Draft Environmental Assessment Pre- Assessment Consultation
Turtle Bay Resort Hotel Renovation
Kahuku, Oahu, Hawaii
TMK: Portions of 5-6-003: 002, 003, 054, 061 and 062; 5-7-001:043, 046, 047, 052, 053, 054, 055 and 056; 5-7-006:028 and 030

Thank you for the opportunity to review and comment. The Department of Design and Construction does not have any comments at this time.

Should you have any further questions, please call me at 768-8480.

Sincerely,

Robert J. Kroning, P.E.
Director

RJK:ms (769101)

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10393-06
June 12, 2019

Mr. Robert J. Kroning, P.E.
Director
City and County of Honolulu
Department of Design and Construction
650 South King Street, 11th Floor
Honolulu, HI 96813

Subject: Environmental Assessment (EA) Pre-Assessment Consultation
Turtle Bay Resort Hotel Renovation
Tax Map Keys (TMK): Portions of 5-6-003: 002, 003, 054, 061 and 062; 5-7-001:043, 046, 047, 052, 053, 054, 055 and 056; 5-7-006:028 and 030
Kahuku, O'ahu, Hawai'i

Dear Mr. Kroning:

Thank you for your letter dated April 29, 2019 regarding the subject Environmental Assessment (EA) Pre-Assessment Consultation.

The scope of your comments is acknowledged and will be incorporated into the EA process moving forward.

Your letter, along with this response, will be reproduced and included in the forthcoming Draft EA.

We appreciate your participation in the EA Pre-Assessment Consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Jim Kwasnowski, BRE Turtle Bay Resort, LLC

EM

DEPARTMENT OF FACILITY MAINTENANCE
CITY AND COUNTY OF HONOLULU
1000 Ulu`ohia Street, Suite 215, Kapolei, Hawaii 96707
Phone: (808) 768-3343 • Fax: (808) 768-3381
Website: www.honolulu.gov

KIRK CALDWELL
MAYOR

ROSS S. SASAMURA, P.E.
DIRECTOR AND CHIEF ENGINEER

EDUARDO P. MANGLALLAN
DEPUTY DIRECTOR

IN REPLY REFER TO:
DRM 19-243

May 3, 2019

Mr. Earl Matsukawa, AICP, Project Manager
Wilson Okamoto Corporation
1907 S. Beretania Street, Suite 400
Honolulu, Hawaii 96826

RECEIVED
MAY 03 2019
WILSON OKAMOTO CORPORATION

Dear Mr. Matsukawa:

Subject: Draft Environmental Assessment Pre-Assessment Consultation
Turtle Bay Resort Hotel Renovation, Kahuku

Thank you for the opportunity to review and comment on the subject project.

We have no comments at this time, as we do not have any facilities or easements on the subject property.

If you have any questions, please call Mr. Kyle Oyasato of the Division of Road Maintenance at 768-3697.

Sincerely,

Ross S. Sasamura, P.E.
Director and Chief Engineer

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10393-06
June 12, 2019

Mr. Ross S. Sasamura, P.E.
Director and Chief Engineer
City and County of Honolulu
Department of Facility Maintenance
1000 Ulu‘ohia Street, Suite 215
Honolulu, HI 96813

Subject: Environmental Assessment (EA) Pre-Assessment Consultation
Turtle Bay Resort Hotel Renovation
Tax Map Keys (TMK): 5-6-003: 002, 003, 043, 054, 061, 062; 5-7-001: 043, 046, 047, 052, 053, 054, 055, 056; 5-7-006: 028, 030
Kahuku, O‘ahu, Hawai‘i

Dear Mr. Sasamura:

Thank you for your letter dated May 3, 2019 regarding the subject Environmental Assessment (EA) Pre-Assessment Consultation.

The scope of your comments is acknowledged and will be incorporated into the EA process moving forward.

Your letter, along with this response, will be reproduced and included in the forthcoming Draft EA.

We appreciate your participation in the EA Pre-Assessment Consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Jim Kwasnowski, BRE Turtle Bay Resort, LLC

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 768-8000 • FAX: (808) 768-6041
DEPT. WEB SITE: www.honoluludpp.org • CITY WEB SITE: www.honolulu.gov

KIRK CALDWELL
MAYOR

KATHY K. SOKUGAWA
ACTING DIRECTOR

TIMOTHY F. T. HIU
DEPUTY DIRECTOR

EUGENE H. TAKAHASHI
DEPUTY DIRECTOR

May 6, 2019

2019/ELOG-745(MS)

Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

RECEIVED
MAY 07 2019
WILSON OKAMOTO CORPORATION

Dear Mr. Matsukawa:

SUBJECT: Pre-Assessment Consultation
Turtle Bay Resort Hotel Renovation
Various Addresses - Kahuku
Tax Map Keys 5-6-003: 002, 003, 043, 054, 061 and 062;
5-7-001: 043, 046, 047, 052, 053, 054, 055 and 056; and
5-7-006: 028 and 030

This is in response to your letter, received on April 17, 2019, requesting pre-assessment consultation for a Draft Environmental Assessment (DEA) for the Hotel Renovation Project (Project) at Turtle Bay Resort (TBR). The Project involves exterior renovations to the existing hotel and ancillary facilities, which includes repair and/or replace the existing fence along Kamehameha Highway with a new rock wall, enlarge an existing cart barn, and demolish the existing guard shack on Kuilima Drive with a new entry feature. Our pre-assessment comments are below:

1. The DEA should address how the proposed Project is consistent with the Objectives and Policies in the General Plan, and the Policies and Guidelines in the Koolau Loa Sustainable Communities Plan.

2. The DEA should include an analysis of the possible impact of sea level rise on the Project.

3. Development within the shoreline area must comply with Revised Ordinances of Honolulu (ROH) Chapter 23 relating to shoreline setbacks. A certified shoreline survey will be required. We note that in a November 8, 2018 letter to Mr. Randall F. Sakumoto (File No. 2018/ELOG-1865), the survey may not need to be the shoreline for the entire TBR property. A survey of the shoreline for the parcel of the Project area will be necessary.

4. The proposed Project is within the Special Management Area (SMA). The DEA should explain how the Project complies with ROH Chapter 25, relating to the SMA.

5. The DEA should list previously approved permits and necessary permits for the proposed Project.

Should you have any questions, please contact Malynne Simeon, of our staff, at 768-8023 or by email at msimeon@honolulu.gov.

Very truly yours,

for Kathy K. Sokugawa
Acting Director

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10393-06
June 12, 2019

Ms. Kathy Sokugawa
Acting Director
City and County of Honolulu
Department of Planning and Permitting
650 South King Street
Honolulu, HI 96813

Subject: Environmental Assessment (EA) Pre-Assessment Consultation
Turtle Bay Resort Hotel Renovation
Tax Map Keys (TMK): 5-6-003: 002, 003, 043, 054, 061 and 062; 5-7-001: 043, 046, 047, 052, 053, 054, 055 and 056; and 5-7-006: 028 and 030
Kakuku, O'ahu, Hawai'i

Dear Ms. Sokugawa:

Thank you for your letter dated May 6, 2019 regarding the subject Environmental Assessment (EA) Pre-Assessment Consultation.

The scope of your comments is acknowledged and will be incorporated into the EA process moving forward.

Your letter, along with this response, will be reproduced and included in the forthcoming Draft EA.

We appreciate your participation in the EA Pre-Assessment Consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Jim Kwasnowski, BRE Turtle Bay Resort, LLC

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

HONOLULU FIRE DEPARTMENT

CITY AND COUNTY OF HONOLULU

636 South Street
Honolulu, Hawaii 96813-5007
Phone: 808-723-7139 Fax: 808-723-7111 Internet: www.honolulu.gov/hfd

KIRK CALDWELL
MAYOR

MANUEL P. NEVES
FIRE CHIEF

LIONEL CAMARA JR.
DEPUTY FIRE CHIEF

April 30, 2019

Mr. Earl Matsukawa, AICP
Project Manager
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

RECEIVED
MAY 02 2019
WILSON OKAMOTO CORPORATION

Dear Mr. Matsukawa:

Subject: Environmental Assessment Preassessment Consultation for Turtle Bay Resort Hotel Renovation
Kahuku, Hawaii
Tax Map Keys: 5-6-003: 002, 003, 043, 054, 061, and 062
5-7-001: 043, 046, 047, 052, 053, 054, 055, and 056
5-7-006: 028 and 030

In response to your letter dated April 12, 2019, regarding the abovementioned subject, the Honolulu Fire Department (HFD) requires that the following must be complied with:

1. Fire department access roads shall be provided such that any portion of the facility or any portion of an exterior wall of the first story of the building is located not more than 150 feet from fire department access roads as measured by an approved route around the exterior of the building or facility. (National Fire Protection Association [NFPA] 1; 2012 Edition, Sections 18.2.3.2.2 and 18.2.3.2.2.1.)

   A fire department access road shall extend to within 50 feet of at least one exterior door that can be opened from the outside and that provides access to the interior of the building. (NFPA 1; 2012 Edition, Section 18.2.3.2.1.)

2. A water supply approved by the county, capable of supplying the required fire flow for fire protection, shall be provided to all premises upon which facilities or buildings, or portions thereof, are hereafter

constructed, or moved into or within the county. When any portion of the facility or building is in excess of 150 feet from a water supply on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building, on-site fire hydrants and mains capable of supplying the required fire flow shall be provided when required by the AHJ [Authority Having Jurisdiction]. (NFPA 1; 2012 Edition, Section 18.3.1, as amended.)

3. The unobstructed width and unobstructed vertical clearance of a fire apparatus access road shall meet county requirements. (NFPA 1; 2012 Edition, Sections 18.2.3.4.1.1 and 18.2.3.4.1.2, as amended.)

4. Submit civil drawings to the HFD for review and approval.

Should you have questions, please contact Battalion Chief Wayne Masuda of our Fire Prevention Bureau at 723-7151 or wmasuda@honolulu.gov.

Sincerely,

SOCRATES D. BRATAKOS
Assistant Chief

SDB/WM:jc

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10393-06
June 12, 2019

Mr. Socrates D. Bratakos
Assistant Chief
City and County of Honolulu
Fire Department
636 South Street
Honolulu, HI 96813

Subject: Environmental Assessment (EA) Pre-Assessment Consultation
Turtle Bay Resort Hotel Renovation
Tax Map Keys (TMK): 5-6-003: 002, 003, 043, 054, 061, and 062; 5-7-001: 043, 046, 047, 052, 053, 054, 055, and 056; 5-7-006: 028 and 030
Kahuku, O'ahu, Hawai'i

Dear Mr. Bratakos:

Thank you for your letter dated April 30, 2019 regarding the subject Environmental Assessment (EA) Pre-Assessment Consultation.

The scope of your comments is acknowledged and will be incorporated into the EA process moving forward.

Your letter, along with this response, will be reproduced and included in the forthcoming Draft EA.

We appreciate your participation in the EA Pre-Assessment Consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Jim Kwasnowski, BRE Turtle Bay Resort, LLC

POLICE DEPARTMENT

CITY AND COUNTY OF HONOLULU

801 SOUTH BERETANIA STREET · HONOLULU, HAWAII 96813
TELEPHONE: (808) 529-3111 · INTERNET: www.honolulupd.org

KIRK CALDWELL
MAYOR

SUSAN BALLARD
CHIEF

JOHN D. McCARTHY
JONATHON GREMS
DEPUTY CHIEFS

OUR REFERENCE EO-WS

April 25, 2019

RECEIVED
APR 29 2019
WILSON OKAMOTO CORPORATION

Mr. Earl Matsukawa, Project Manager
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Matsukawa:

This is in response to your letter of April 12, 2019, regarding the draft environmental assessment for the Turtle Bay Resort Hotel Renovation project in Kahuku, Oahu.

The Honolulu Police Department (HPD) anticipates short-term and long-term impacts to pedestrian and vehicular traffic around the area of the project, in particular, the area fronting the property along Kamehameha Highway.

The assessment does indicate that enhancements will be made to the existing entry feature at the main entrance to the resort, as well as repairs and/or replacement to the existing property fence line along Kamehameha Highway. Therefore, the HPD recommends that all necessary signs, lights, barricades, and other safety equipment be installed and maintained by the contractor to facilitate the flow of traffic during the construction phase of the project.

If there are any questions, please call Major Crizalmer Caraang of District 4 (Kaneohe, Kailua, Kahuku) at 723-8639.

Thank you for the opportunity to review this project.

Sincerely,

for ALLAN T. NAGATA
Assistant Chief
Support Services Bureau

Serving and Protecting With Aloha

WILSON OKAMOTO CORPORATION
INNOVATORS · PLANNERS · ENGINEERS

10393-06
June 12, 2019

Mr. Allen T. Nagata
Assistant Chief
Support Services Bureau
City and County of Honolulu
Police Department
801 South Beretania Street
Honolulu, HI 96813

Subject: Environmental Assessment (EA) Pre-Assessment Consultation
Turtle Bay Resort Hotel Renovation
Tax Map Keys (TMK): 5-6-003: 002, 003, 043, 054, 061, and 062; 5-7-001: 043, 046, 047, 052, 053, 054, 055, and 056; 5-7-006: 028 and 030
Kahuku, O'ahu, Hawai'i

Dear Mr. Nagata:

Thank you for your letter dated April 25, 2019 regarding the subject Environmental Assessment (EA) Pre-Assessment Consultation.

The scope of your comments is acknowledged and will be incorporated into the EA process moving forward.

Your letter, along with this response, will be reproduced and included in the forthcoming Draft EA.

We appreciate your participation in the EA Pre-Assessment Consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Jim Kwasnowski, BRE Turtle Bay Resort, LLC

DEPARTMENT OF PARKS & RECREATION

CITY AND COUNTY OF HONOLULU

1000 Uluohia Street, Suite 309, Kapolei, Hawaii 96707
Phone: (808) 768-3003 • Fax: (808) 768-3053
Website: www.honolulu.gov

KIRK CALDWELL
MAYOR

MICHELE K. NEKOTA
DIRECTOR

JEANNE C. ISHIKAWA
DEPUTY DIRECTOR

April 26, 2019

Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96826

RECEIVED
APR 29 2019
WILSON OKAMOTO CORPORATION

Dear Mr. Matsukawa:

SUBJECT: Draft Environmental Assessment-Pre Assessment Consultation
Turtle Bay Resort Hotel Renovation
Kahuku, Oahu, Hawaii
TMKs: Portions of 5-6-003:002, 003, 043, 054, 061 and 062;
5-7-001:043, 046, 047, 052, 053, 054, 055 and 056; 5-7-006:028
and 030

Thank you for the opportunity to review and comment at the early consultation stage of the Environmental Assessment for the subject Turtle Bay Resort Hotel Renovations.

The Department of Parks and Recreation requests additional specific details in the Environmental Assessment regarding the establishment of public shoreline accesses in compliance with land use entitlements.

Should you have any questions, please contact John Reid, Planner at 768-3017.

Sincerely,

Michele K. Nekota
Director

MKN:jr
(769213)

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10393-06
June 12, 2019

Ms. Michele K. Nekota
Director
City and County of Honolulu
Department of Parks and Recreation
1000 Uluohia Street, Suite 309
Kapolei, HI 96707

Subject: Environmental Assessment (EA) Pre-Assessment Consultation
Turtle Bay Resort Hotel Renovation
Tax Map Keys (TMK): Portions of 5-6-003:002, 003, 043, 054, 061 and 062; 5-7-001:043, 046, 047, 052, 053, 054, 055 and 056; 5-7-006:028 and 030
Kahuku, O'ahu, Hawai'i

Dear Ms. Nekota:

Thank you for your letter dated April 26, 2019 regarding the subject Environmental Assessment (EA) Pre-Assessment Consultation.

The scope of your comments is acknowledged and will be incorporated into the EA process moving forward.

Your letter, along with this response, will be reproduced and included in the forthcoming Draft EA.

We appreciate your participation in the EA Pre-Assessment Consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Jim Kwasnowski, BRE Turtle Bay Resort, LLC

HAWAI'IGAS
THE CLEAN ENERGY COMPANY

April 25, 2019

RECEIVED
APR 29 2019
WILSON OKAMOTO CORPORATION

Mr. Earl Matsukawa, AICP
Wilson Okamoto Corporation
1907 S Beretania Street. Suite 400
Honolulu, Hawaii 96826

Dear Mr. Matsukawa:

Subject: Draft Environmental Assessment (DEA) Pre-Assessment Consultation
Turtle Bay Resort Hotel Renovation

In response to your letter dated April 12, 2019, it has been determined that the area is currently clear of utility gas facilities.

Thank you for the opportunity to comment on the Draft Environmental Assessment Pre-Assessment Consultation. Should there be any questions, or if additional information is desired, please call Kristen Asato 596-1425.

Sincerely,

Hawaii Gas

Keith K. Yamamoto
Manager, Engineering

KKY:krs

WILSON OKAMOTO
CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10393-06
June 12, 2019

Mr. Keith K. Yamamoto
Manager, Engineering
Hawaii Gas
P.O. Box 3000
Honolulu, HI 96802-3000

Subject: Environmental Assessment (EA) Pre-Assessment Consultation
Turtle Bay Resort Hotel Renovation
Tax Map Keys (TMK): Portions of 5-6-003:002, 003, 043, 054, 061, 062; 5-7-001:043, 046, 047, 052, 053, 054, 055, 056; 5-7-006:028 and 030
Kahuku, O'ahu, Hawai'i

Dear Mr. Yamamoto:

Thank you for your letter dated April 25, 2019 regarding the subject Environmental Assessment (EA) Pre-Assessment Consultation.

The scope of your comments is acknowledged and will be incorporated into the EA process moving forward. Per your request, a consultation meeting will be coordinated with your office once the proposed project alignment is determined and additional details are available.

Your letter, along with this response, will be reproduced and included in the forthcoming Draft EA.

We appreciate your participation in the EA Pre-Assessment Consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Jim Kwasnowski, BRE Turtle Bay Resort, LLC

Wilson Okamoto, Corporation
1907 S. Beretania St. Suite 400
Honolulu, Hawai`i 96826

RE: Draft Environmental Assessment Pre-Assessment Consultation Turtle Bay Resort Hotel Renovation Kahuku, O'ahu, Hawai'i
TMKs: Portions of 5-6-003:002, 003, 043, 054, 061 and 062; 5-7-001:043, 046, 047, 052, 053, 054, 055 and 056; 5-7-006:028 and 030

FR: Ko`olauloa Neighborhood Board #28

Aloha Earl Matusukawa,

Mahalo for sharing your Draft EA with the Board.

The timing of its arrival precluded the Board from inviting you to be on the agenda. However the Board did review the report and offers the following comments below. As this project moves forward we would appreciate a presentation to the Board on the project as any activity at the resort has significant impact on our NB area.

The Board would like to see the following issues addressed in the EA.

- There should be a discussion and what proposed renovations will impact traffic and how that impact will be mitigated. Specifically from the draft document items such as:
  - Will the property fence line rehabilitation impact traffic flow, if so, what is the mitigation plan for that, and how long is this rehabilitation anticipated to take
  - During the entrance enhancement, are there plans to provide a left turning lane into the property for traffic heading from Sunset to Kahuku? This does not appear to be in the current plans and the Board strongly suggests that this be included as part of this project.
  - The City Bus uses must transit through Turtle Bay, will the City Bus time schedule be significantly impacted for local residents and commuters by the proposed construction? What mitigation measures will be taken to assure that delays do not occur?
- The project is doing work within the sensitive SMA area. The Board would like to see a discussion on mitigation measures that will be taken to prevent impacts on the coastal area during construction. Some of the areas the Board feels need to be discussed include but are not limited to:
  - Containment of run off from any construction activities
  - Details on impacts of pool replacement i.e. are you building a new pool structure or using the existing constructed footprint?
  - Any impacts on existing vegetation especially native plants
  - Any runoff or construction impacts from construction of the new pool at the beach cottages
  - Are there any potential erosion short or long term problems that could be caused by the construction of new entry lanais at the beach cottages
  - Will the landscaping and trellis materials be native plants?
  - Will a hazardous material assessment be done? The hotel is of sufficient age that it may have lead paint or asbestos containing materials which will require special handling.
  - A better map which would include the size and placement of the various expansions and new construction would be helpful. Right now there is no way to tell what construction items will require work in the SMA and what will not.
- The document states there will be no long-term degradation what are the anticipated short term impacts and how will they be mitigated. The Board has enumerated some above in their comments and we would like a complete list.

Again mahalo for giving the Board the opportunity to comment.

Me ke aloha pumehana,

Dee Dee Letts, Chair

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10393-06
June 12, 2019

Ms. Dee Dee Letts
Chair
Ko'olauloa Neighborhood Board #28
Hau'ula Community Center
54-010 Kukuna Road
Hau'ula, HI 96717

Subject: Environmental Assessment (EA) Pre-Assessment Consultation
Turtle Bay Resort Hotel Renovation
Tax Map Keys (TMK): Portions of 5-6-003:002, 003, 043, 054, 061 and 062; 5-7-001:043, 046, 047, 052, 053, 054, 055 and 056; 5-7-006:028 and 030
Kahuku, O'ahu, Hawai'i

Dear Ms. Letts:

Thank you for your letter regarding the subject Environmental Assessment (EA) Pre-Assessment Consultation.

The scope of your comments is acknowledged and will be incorporated into the EA process moving forward.

Your letter, along with this response, will be reproduced and included in the forthcoming Draft EA.

We appreciate your participation in the EA Pre-Assessment Consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Jim Kwasnowski, BRE Turtle Bay Resort, LLC

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

EM

DAVID Y. IGE
GOVERNOR

CURT T. OTAGURO
COMPTROLLER

AUDREY HIDANO
DEPUTY COMPTROLLER

STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P.O. BOX 119, HONOLULU, HAWAII 96810-0119

(P)19.074

APR 30 2019

RECEIVED
MAY 01 2019
WILSON OKAMOTO CORPORATION

Mr. Earl Matsukawa, AICP, Project Manager
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

Dear Mr. Matsukawa:

Subject: Draft Environmental Assessment Pre-Assessment Consultation
Turtle Bay Resort Hotel Renovation
Kahuku, Oahu, Hawaii
TMKs: Portions of 5-6-003:002, 003, 043, 054, 061 and 062; 5-7-001:043, 046, 047, 052, 053, 054, 055 and 056; 5-7-006:028 and 030

Thank you for the opportunity to provide comments for the subject project. The proposed project does not impact any of the Department of Accounting and General Services' existing facilities in the area, and we have no comments to offer at this time.

If you have any questions, please have your staff call Mr. Dennis Chen of the Public Works Division at 586-0491.

Sincerely,

CURT T. OTAGURO
Comptroller

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10393-06
June 12, 2019

Mr. Curt T. Otaguro
Comptroller
State of Hawai'i
Department of Accounting and General Services
1132 Bishop Street, Suite 1410
Honolulu, HI 96813

Subject: Environmental Assessment (EA) Pre-Assessment Consultation
Turtle Bay Resort Hotel Renovations
Tax Map Keys (TMK): Portions of 5-6-003:002, 003, 043, 054, 061 and 062; 5-7-001:043, 046, 047, 052, 053, 054, 055 and 056; 5-7-006:028 and 030
Kakuku, O'ahu, Hawai'i

Dear Mr. Otaguro:

Thank you for your letter dated April 30, 2019 regarding the subject Environmental Assessment (EA) Pre-Assessment Consultation.

We acknowledge that the Department of Accounting and General Services does not have any comments at this time.

Your letter, along with this response, will be reproduced and included in the forthcoming Draft EA.

We appreciate your participation in the EA Pre-Assessment Consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Jim Kwasnowski, BRE Turtle Bay Resort, LLC

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

DAVID Y. IGE
GOVERNOR OF HAWAII

RECEIVED
APR 26 2019
WILSON OKAMOTO CORPORATION

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
POST OFFICE BOX 621
HONOLULU, HAWAII 96809

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA
FIRST DEPUTY

M. KALEO MANUEL
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

REF:OCCL:SS

Correspondence: OA 19-165

APR 23 2019

Wilson Okamoto Corporation
ATTN: Earl Matsukawa, AICP, Project Manager
1907 S. Beretania Street, Suite 400
Honolulu, HI 96826

SUBJECT: Environmental Assessment Pre-Consultation Regarding Proposed Turtle Bay Resort Hotel Renovation, Kahuku, Oahu, Hawaii
Portions of Tax Map Keys: (1) 5-6-003: 002, 003, 043, 054, 061, 062;
(1) 5-7-001: 043, 046, 047, 052, 053, 054, 055, 056; and
(1) 5-7-006: 028 and 030

Dear Mr. Matsukawa,

Thank you for contacting the Department of Land and Natural Resources, Office of Conservation and Coastal Lands (OCCL) regarding the Environmental Assessment (EA) that is being prepared for the proposed renovation of the subject property. Your letter included a project summary sheet, location map, and details of the work to be completed. The project summary states that the project will consist of renovations and repairs to the main hotel building, interior and exterior improvements to the visitor arrival and registration areas, on-site vehicular and pedestrian circulation improvements, repair and reconfiguration of the pool and recreation areas, and establishment of public shoreline accesses in compliance with land use entitlements.

The OCCL appreciates your notification of the proposed construction and will wait until the Draft Environmental Assessment (DEA) is received before making substantive comments, determinations, or decisions, if any.

If you have further questions, please feel free to contact Salvatore Saluga in the Office of Conservation and Coastal Lands at 587-0399 or Salvatore.J.Saluga@hawaii.gov.

Sincerely,

SAMUEL J. LEMMO, ADMINISTRATOR
OFFICE OF CONSERVATION AND COASTAL LANDS

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10393-06
June 12, 2019

Mr. Samuel J. Lemmo
Administrator
Office of Conservation and Coastal Lands
State of Hawai'i
Department of Land and Natural Resources
P.O. Box 621
Honolulu, HI 96809

Subject: Environmental Assessment (EA) Pre-Assessment Consultation
Turtle Bay Resort Hotel Renovations
Tax Map Keys (TMK): Portions of 5-6-003:002, 003, 043, 054, 061, 062; 5-7-001:043, 046, 047, 052, 053, 054, 055, 056; 5-7-006:028 and 030
Kahuku, O'ahu, Hawai'i

Dear Mr. Lemmo:

Thank you for your letter dated April 23, 2019 regarding the subject Environmental Assessment (EA) Pre-Assessment Consultation.

The scope of your comments is acknowledged and will be incorporated into the EA process moving forward.

Your letter, along with this response, will be reproduced and included in the forthcoming Draft EA.

We appreciate your participation in the EA Pre-Assessment Consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Jim Kwasnowski, BRE Turtle Bay Resort, LLC

DAVID Y. IGE
GOVERNOR OF HAWAII

BRUCE S. ANDERSON, Ph.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File:

April 24, 2019

RECEIVED
APR 26 2019
WILSON OKAMOTO CORPORATION

Mr. Earl Matsukawa
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, HI 96826

Dear Mr. Matsukawa:

Thank you for your submittal requesting comments to the Draft Environmental Assessment Pre-Assessment Consultation for the Turtle Bay Resort Hotel Renovation Project.

Project activities shall comply with the following Administrative Rules of the Department of Health:

- Chapter 11-46 Community Noise Control

Should you have any questions, please contact me at (808) 586-4700.

Sincerely,

Jeffrey M. Eckerd
Program Manager
Indoor and Radiological Health Branch

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10393-06
June 12, 2019

Mr. Jeffrey M. Eckerd
Project Manager
Indoor and Radiological Health Branch
State of Hawai'i
Department of Health
P.O. Box 3378
Honolulu, HI 96801

Subject: Environmental Assessment (EA) Pre-Assessment Consultation
Turtle Bay Resort Hotel Renovations
Tax Map Keys (TMK): Portions of 5-6-003:002, 003, 043, 054, 061, 062; 5-7-001:043, 046, 047, 052, 053, 054, 055, 056; 5-7-006:028 and 030
Kahuku, O'ahu, Hawai'i

Dear Mr. Eckerd:

Thank you for your letter dated April 24, 2019 regarding the subject Environmental Assessment (EA) Pre-Assessment Consultation.

The scope of your comments is acknowledged and will be incorporated into the EA process moving forward.

Your letter, along with this response, will be reproduced and included in the forthcoming Draft EA.

We appreciate your participation in the EA Pre-Assessment Consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Jim Kwasnowski, BRE Turtle Bay Resort, LLC

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

DAVID Y. IGE
GOVERNOR

JADE T. BUTAY
DIRECTOR

Deputy Director
LYNN A.S. ARAKI-REGAN
DEREK J. CHOW
ROSS M. HIGASHI
EDWIN H. SNIFFEN

IN REPLY REFER TO:
DIR 0394
HWY-PS 2.0049

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

May 21, 2019

Mr. Earl Matsukawa
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawaii 96826

RECEIVED

Dear Mr. Matsukawa:

Subject: Consultation for Draft Environmental Assessment (DEA)
Turtle Bay Resort Hotel Renovation
Oahu, Koolauloa, Kahuku, TMK: (1) 5-6-003: var; 5-7-001: vars; 5-7-006: vars

BRE Turtle Bay Resort, LLC and affiliates proposes to renovate the Turtle Bay Hotel (Hotel), various hotel facilities, and construct other improvements. The Hotel has access to Kamehameha Highway, State Route 83, via Kuilima Drive.

A DEA is being prepared pursuant to the requirements of Revised Ordinances of Honolulu, Chapter 25, Special Management Area, and Hawaii Revised Statutes Chapter 343.

The Hawaii Department of Transportation (HDOT) has the following comments:

1. A Traffic Assessment (TA) should be prepared and submitted to HDOT for review and acceptance.

2. The TA should include future improvements proposed along Kamehameha Highway at Kuilima Drive and Camp Kawela Road.

If you have any questions, please contact Ken Tatsuguchi, Engineering Program Manager, Highways Division, Planning Branch, at (808) 587-1830. Please reference file review number 2019-046.

Sincerely,

JADE T. BUTAY
Director of Transportation

WILSON OKAMOTO CORPORATION
INNOVATORS · PLANNERS · ENGINEERS

10393-06
June 12, 2019

Ms. Jade T. Butay
Director of Transportation
State of Hawai'i
Department of Transportation
869 Punchbowl Street
Honolulu, HI 96813

Subject: Environmental Assessment (EA) Pre-Assessment Consultation
Turtle Bay Resort Hotel Renovations
Tax Map Keys (TMK): Portions of 5-6-003:002, 003, 043, 054, 061 and 062; 5-7-001:043, 046, 047, 052, 053, 054, 055 and 056; 5-7-006:028 and 030
Kakuku, O'ahu, Hawai'i

Dear Mr. Butay:

Thank you for your letter dated May 21, 2019 regarding the subject Environmental Assessment (EA) Pre-Assessment Consultation.

A Traffic Assessment will be prepared and submitted to HDOT in conjunction with any future improvements proposed along Kamehameha Highway at Kuilima Drive and Camp Kawela Road.

Your letter, along with this response, will be reproduced and included in the forthcoming Draft EA.

We appreciate your participation in the EA Pre-Assessment Consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Jim Kwasnowski, BRE Turtle Bay Resort, LLC

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

OFFICE OF PLANNING
STATE OF HAWAII

DAVID Y. IGE
GOVERNOR

DIRECTOR
OFFICE OF PLANNING

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

Telephone: (808) 587-2846
Fax: (808) 587-2824
Web: http://planning.hawaii.gov/

DTS201904261727NA

April 29, 2019

RECEIVED
APR 30 2019
WILSON OKAMOTO CORPORATION

Mr. Earl Matsukawa, Project Manager
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, HI 96826

Dear Mr. Matsukawa

Subject: Draft Environmental Assessment Pre-Assessment Consultation for Turtle Bay Resort Hotel Renovation, Kahuku, Oahu, Hawaii; Tax Map Key: Portions of (1) 5-6-003: 002, 003, 043, 054, 061 and 062; (1) 5-7-001: 043, 046, 047, 052, 053, 054, 055 and 056; (1) 5-7-006: 028 and 030

The Office of Planning (OP) is in receipt of your Draft Environmental Assessment (EA) pre-assessment consultation request, received April 16, 2019, for Turtle Bay Resort Hotel Renovation Project.

According to your request, BRE Turtle Bay Holdings, LLC is proposing to renovate the existing Turtle Bay Hotel and various support facilities. The proposed hotel renovations consist of repairs to the main hotel building, improvements to the visitor arrival and registration areas, on-site vehicular and pedestrian circulation improvements, repair and reconfiguration of the pool and recreation areas, and establishment of public shoreline accesses in compliance with land use entitlements. The beach cottages and various support facilities are also to be renovated.

The OP has reviewed the Draft EA pre-assessment consultation request and has the following comments to offer:

1. The Hawaii State Planning Act, Hawaii Revised Statutes (HRS) Chapter 226, provides goals, objectives, policies, and priority guidelines for growth, development, and the allocation of resources throughout the state in areas of state interest. The Draft EA should discuss the compatibility of the proposed development with the objectives and policies, and priority guidelines listed in HRS Chapter 226.

2. The Hawaii Coastal Zone Management (CZM) Act, HRS Chapter 205A, requires all state and county agencies to enforce the CZM objectives and policies. The Draft EA should include an assessment as to how the proposed development conforms to CZM objectives and supporting policies set forth in HRS § 205A-2, as amended. These objectives and policies include: recreational resources, historic resources, scenic and open space resources, coastal ecosystems, economic uses, coastal hazards, managing development, public participation, beach protection and marine resources.

3. Sea level rise increases the risk of flooding, storm surges, and coastal erosion. The OP suggests that the Draft EA refer to the findings of the Hawaii Sea Level Rise Vulnerability and Adaptation Report 2017, accepted by the Hawaii Climate Change Mitigation and Adaptation Commission. The Report, and Hawaii Sea Level Rise Viewer at http://climateadaptation.hawaii.gov/ particularly identifies 3.2-foot sea level rise exposure areas across the main Hawaiian Islands including Oahu, which is anticipated to occur in the mid to latter half of the 21st century. The EA may consider site-specific mitigation measures to respond to the potential impacts of sea level rise on the project area.

4. The Draft EA should assess potential impacts of the proposed project on the existing drainage system and water quality, and discuss site-specific mitigation measures to prevent any runoff, sediment, soil and debris resulting from the proposed construction, including excavation, grading and staging, from adversely impacting the coastal ecosystem and the State waters as specified in Hawaii Administrative Rules (HAR) Chapter 11-54.

   OP's Stormwater Impact Assessments, a document for Hawaii's environmental review process, could help the proposed project to identify and evaluate information on hydrology, stressors, sensitivity of aquatic and riparian resources, and management measures to control runoff occurrences. Mitigation measures listed in this document can be applied to water runoff strategies to protect coastal ecosystems.

   The document is available at http://files.hawaii.gov/dbedt/op/czm/initiative/stomwater_imapct/final_stormwater_impact_assessments_guidance.pdf

5. Given that the EA is triggered by the Special Management Area (SMA) Use Permit application assessment, the OP suggests that the Draft EA specifically discuss the requirements of the SMA use in accordance with the county SMA ordinances. The Draft EA should also assess as to whether any proposed structure and activities would occur within the shoreline area as defined in HRS § 205A-41, and discuss shoreline setback requirements in accordance with the county shoreline setback ordinances.

If you have any questions regarding this comment letter, please contact Shichao Li of our office at (808) 587-2841.

Sincerely,

Leo R. Asuncion
Planning Program Administrator

c: Ms. Kathy K. Sokugawa, Acting Director, City and County of Honolulu, Department of Planning and Permitting

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10393-06
June 12, 2019

Mr. Leo R. Asuncion
Planning Program Administrator
State of Hawai'i
Office of Planning
235 South Beretania Street, 6th Floor
Honolulu, HI 96813

Subject: Environmental Assessment (EA) Pre-Assessment Consultation
Turtle Bay Resort Hotel Renovation
Tax Map Keys (TMK): Portions of 5-6-003:002, 003, 043, 054, 061 and 062; 5-7-001:043, 046, 047, 052, 053, 054, 055 and 056; 5-7-006: 028 and 030
Kahuku, O'ahu, Hawai'i

Dear Mr. Asuncion:

Thank you for your letter dated April 29, 2019 regarding the subject Environmental Assessment (EA) Pre-Assessment Consultation.

The scope of your comments is acknowledged and will be incorporated into the EA process moving forward.

Your letter, along with this response, will be reproduced and included in the forthcoming Draft EA.

We appreciate your participation in the EA Pre-Assessment Consultation review process.

Sincerely,

Earl Matsukawa, AICP
Project Manager

cc: Jim Kwasnowski, BRE Turtle Bay Resort, LLC

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawai‘i 96850

In Reply Refer To:
01EPIF00-2019-TA-290

May 2, 2019

Mr. Earl Matsukawa
Wilson Okamoto Corporation
1907 South Beretania Street, Suite 400
Honolulu, Hawai‘i 96826

Subject: Response to your Request for Technical Assistance Regarding the Draft Environmental Assessment for the Turtle Bay Resort Hotel Renovation Project

Dear Mr. Matsukawa,

Thank you for your recent correspondence requesting technical assistance on species biology, habitat, or life requisite requirements. The Pacific Islands Fish and Wildlife Office (PIFWO) of the U.S. Fish and Wildlife Service (Service) appreciates your efforts to avoid or minimize effects to protected species associated with your proposed actions. We provide the following information for your consideration under the authorities of the Endangered Species Act (ESA) of 1973 (16 U.S.C. 1531 *et seq.*), as amended.

Due to significant workload constraints, PIFWO is currently unable to specifically address your information request. The table below lists the protected species most likely to be encountered by projects implemented within the Hawaiian Islands. Based on your project location and description, we have noted the species most likely to occur within the vicinity of the project area, in the '**Occurs In or Near Project Area'** column. Please note this list is not comprehensive and should only be used for general guidance. We have added to the PIFWO website, located at https://www.fws.gov/pacificislands/promo.cfm?id=177175840 recommended conservation measures intended to avoid or minimize adverse effects to these federally protected species and best management practices to minimize and avoid sedimentation and erosion impacts to water quality.

If you are representing a federal action agency, please use the official species list on our web-site for your section 7 consultation. You can find out if your project occurs in or near designated critical habitat here: https://ecos.fws.gov/ipac/.

Under section 7 of the ESA, it is the Federal agency's (or their non-Federal designee) responsibility to make the determination of whether or not the proposed project "may affect" federally listed species or designated critical habitat. A "may affect, not likely to adversely affect" determination is appropriate when effects to federally listed species are expected to be discountable (*i.e.*, unlikely to occur), insignificant (minimal in size), or completely beneficial.

This conclusion requires written concurrence from the Service. If a "may affect, likely to adversely affect" determination is made, then the Federal agency must initiate formal consultation with the Service. Projects that are determined to have "no effect" on federally listed species and/or critical habitat do not require additional coordination or consultation.

Implementing the avoidance, minimization, or conservation measures for the species that may occur in your project area will normally enable you to make a "may affect, not likely to adversely affect" determination for your project. If it is determined that the proposed project may affect federally listed species, we recommend you contact our office early in the planning process so that we may assist you with the ESA compliance. If the proposed project is funded, authorized, or permitted by a Federal agency, then that agency should consult with us pursuant to section 7(a)(2) of the ESA. If no Federal agency is involved with the proposed project, the applicant should apply for an incidental take permit under section 10(a)(1)(B) of the ESA. A section 10 permit application must include a habitat conservation plan that identifies the effects of the action on listed species and their habitats, and defines measures to minimize and mitigate those adverse effects.

We appreciate your efforts to conserve endangered species. We regret that we cannot provide you with more specific protected species information for your project site. If you have questions that are not answered by the information on our website, you can contact PIFWO at (808) 792-9400 and ask to speak to the lead biologist for the island where your project is located.

Sincerely,

Island Team Manager
Pacific Islands Fish and Wildlife Office

The table below lists the protected species most likely to be encountered by projects implemented within the Hawaiian Islands. For your guidance, we've marked species that may occur in the vicinity of your project, this list is not comprehensive and should only be used for general guidance.

Scientific Name	Common Name / Hawaiian Name	Federal Status	May Occur In Project Area
Mammals			
Lasiurus cinereus semotus	Hawaiian hoary bat/ ʻōpeʻapeʻa	E	☒
Reptiles			
Chelonia mydas	Green sea turtle/honu - Central North Pacific DPS	T	☒
Erectmochelys imbricata	Hawksbill sea turtle/ Honu ʻea	E	☐
Birds			
Anas wyvilliana	Hawaiian duck/ koloa	E	☐
Branta sandvicensis	Hawaiian goose/ nēnē	E	☐
Fulica alai	Hawaiian coot/ ʻalae kea	E	☒
Gallinula galeata sandvicensis	Hawaiian gallinule/ ʻalae ʻula	E	☒
Himantopus mexicanus knudseni	Hawaiian stilt/ Aeʻo	E	☒
Oceanodroma castro	Band-rumped storm-petrel/ ʻakēʻakē	E	☒
Pterodroma sandwichensis	Hawaiian petrel/ ʻuaʻu	E	☒
Puffinus auricularis newelli	Newell's shearwater/ ʻaʻo	T	☒
Ardenna pacificus	Wedge-tailed Shearwater/ ʻuaʻu kani	MBTA	☒
Gygis alba	White Tern/ manu-o-kū	MBTA	☐
Buteo solitarius	Hawaiian hawk/ ʻio	E	☐
Insects			
Hylaeus anthracinus	Anthricinan yellow-faced bee	E	☒
H. longiceps	Hawaiian yellow-faced bee	E	☒
Megalagrion pacificum	Pacific Hawaiian Damselfly	E	☐
M. xanthomelas	Orangeblack Hawaiian Damselfly	E	☐

Plants				
Scientific Name	**Common Name or Hawaiian Name**	**Federal Status**	**Locations**	**May Occur In Project Area**
Abutilon menziesii	Koʻoloaʻula	E	O, L, M, H	☐
Achyranthes splendens var. *rotundata*	ʻEwa hinahina	E	O	☐
Bonamia menziesii	No common name	E	K, O, L, M, H	☐
Canavalia pubescens	ʻĀwikiwiki	E	Ni, K, L, M	☐
Colubrina oppositifolia	Kauila	E	O, M, H	☐
Cyperus trachysanthos	Puʻukaʻa	E	K, O	☐
Gouania hillebrandii	No common name	E	Mo, M	☐
Hibiscus brackenridgei	Maʻo hau hele	E	O, Mo, L, M, H	☐
Ischaemum byrone	Hilo ischaemum	E	K, O, Mo, M, H	☐
Isodendrion pyrifolium	Wahine noho kula	E	O, H	☐
Marsilea villosa	ʻIhiʻihi	E	Ni, O, Mo	☐
Mezoneuron kavaiense	Uhiuhi	E	O, H	☐
Nothocestrum breviflorum	ʻAiea	E	H	☐
Panicum fauriei var. *carteri*	Carter's panicgrass	E	Molokini Islet (O), Mo	☐
Panicum niihauense	Lauʻehu	E	K	☐
Peucedanum sandwicense	Makou	E	K, O, Mo, M	☐
Pleomele (Chrysodracon) hawaiiensis	Halapepe	E	H	☐
Portulaca sclerocarpa	ʻIhi	E	L, H	☐
Portulaca villosa	ʻIhi	E	Le, Ka, Ni, O, Mo, M, L, H, Nihoa	☐
Pritchardia affinis (maideniana)	Loulu	E	H	☐
Pseudognaphalium sandwicensium var. *molokaiense*	ʻEnaʻena	E	Mo, M	☐
Scaevola coriacea	Dwarf naupaka	E	Mo, M	☐
Schenkia (*Centaurium*) *sebaeoides*	ʻĀwiwi	E	K, O, Mo, L, M	☐
Sesbania tomentosa	ʻŌhai	E	Ni, Ka, K, O, Mo, M, L, H, Necker, Nihoa	☒
Tetramolopium rockii	No common name	T	Mo	☐
Vigna o-wahuensis	No common name	E	Mo, M, L, H, Ka	☐

Location key: O=Oʻahu, K=Kauaʻi, M=Maui, H=Hawaiʻi Island, L=Lānaʻi, Mo=Molokaʻi, Ka=Kahoʻolawe, Ni=Niʻihau, Le=Lehua

WILSON OKAMOTO CORPORATION
INNOVATORS • PLANNERS • ENGINEERS

10393-06
June 12, 2019

Mr. Aaron Nadig
Island Team Manager
United States Department of Interior
Fish and Wildlife Service
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, HI 96850

Subject: Environmental Assessment (EA) Pre-Assessment Consultation
Turtle Bay Resort Hotel Renovation
Tax Map Keys (TMK): Portions of 5-6-003:002, 003, 043, 054, 061 and 062; 5-7-001:043, 046, 047, 052, 053, 054, 055 and 056; 5-7-006:028 and 030
Kahuku, Oʻahu, Hawaiʻi

Dear Mr. Nadig:

Thank you for your letter dated May 2, 2019 regarding the subject Environmental Assessment (EA) Pre-Assessment Consultation.

The scope of your comments is acknowledged and will be incorporated into the EA process moving forward.

Your letter, along with this response, will be reproduced and included in the forthcoming Draft EA.

We appreciate your participation in the EA Pre-Assessment Consultation review process.

Sincerely,

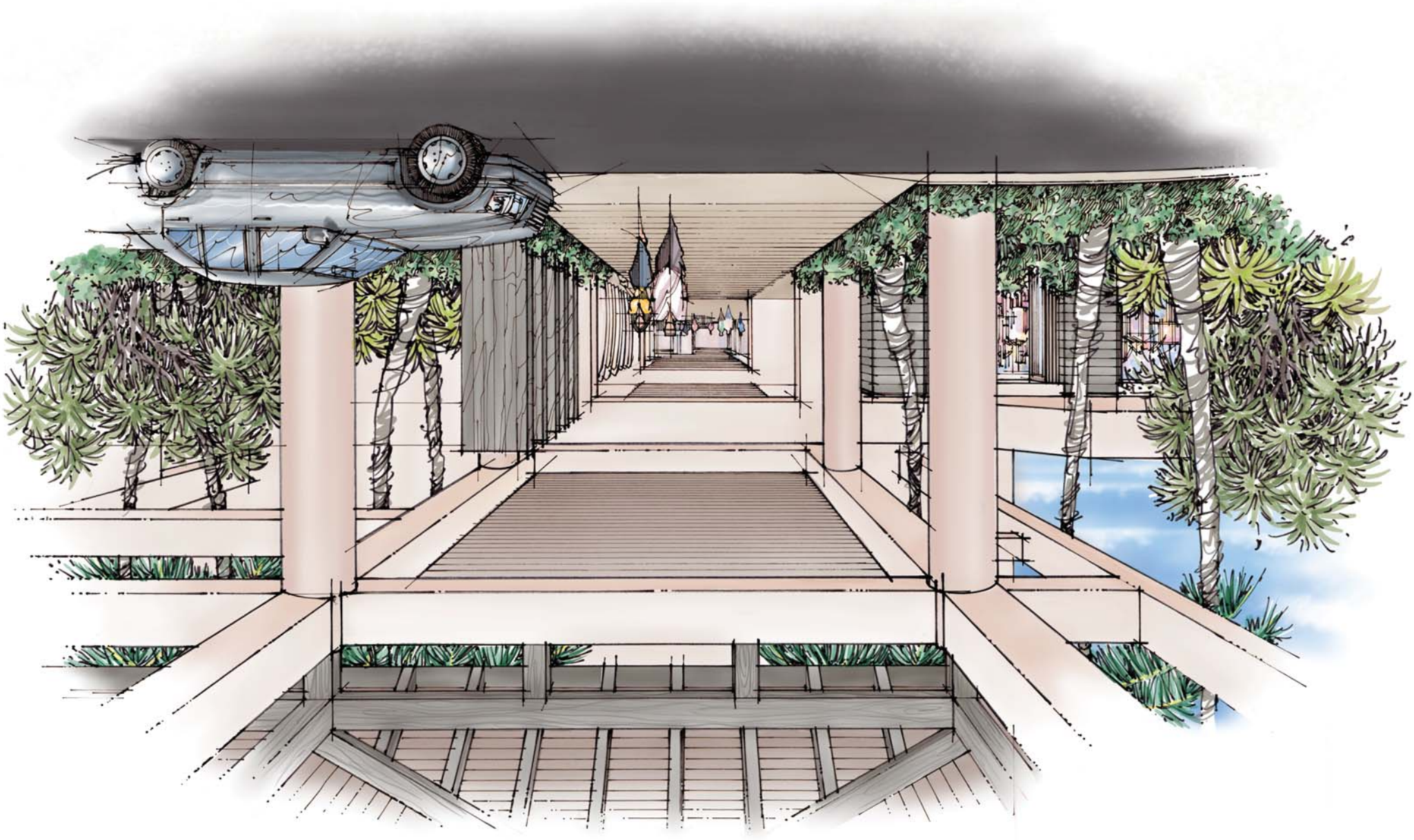
Earl Matsukawa, AICP
Project Manager

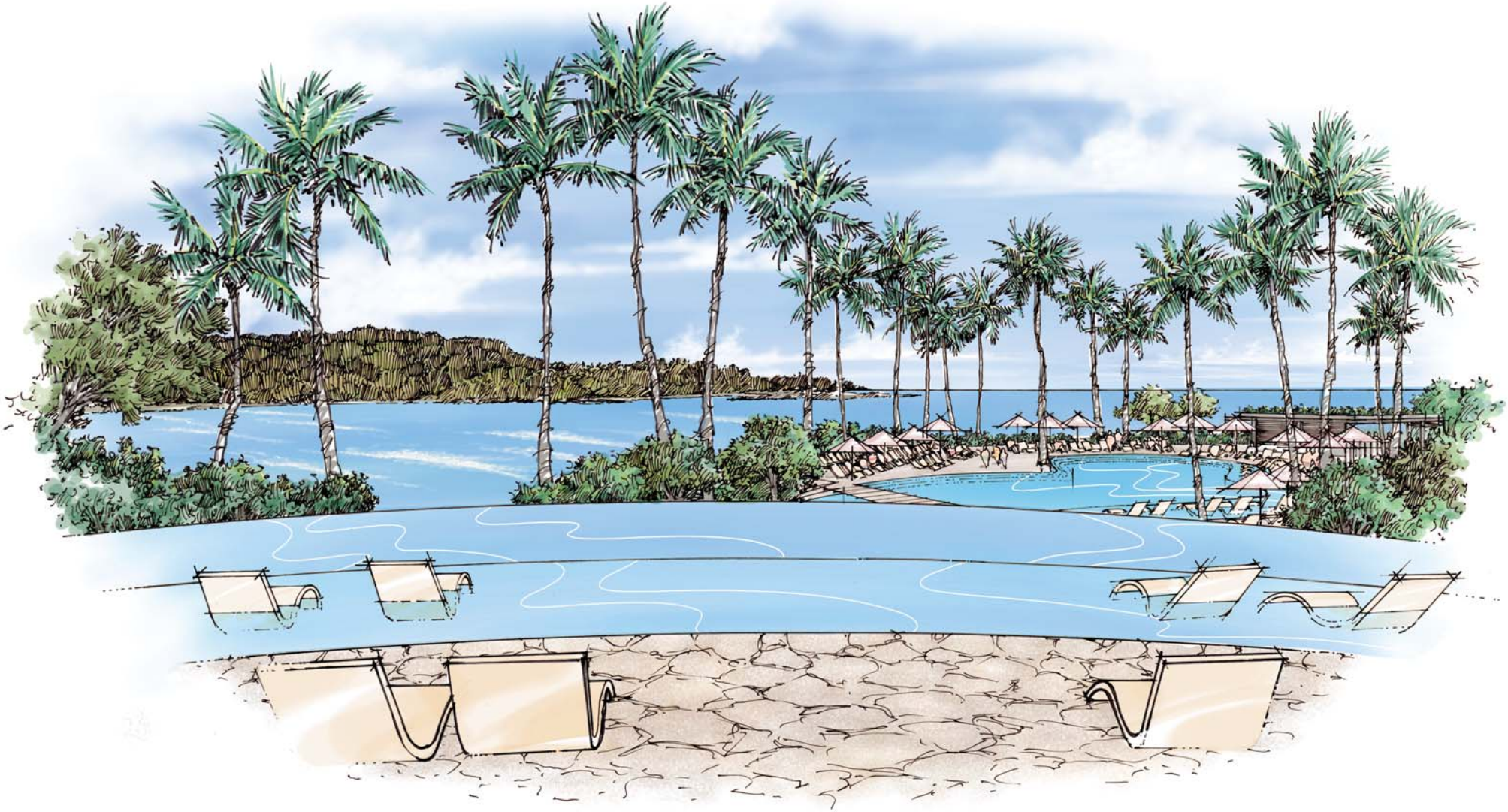
cc: Jim Kwasnowski, BRE Turtle Bay Resort, LLC

1907 S. Beretania Street, Suite 400 • Honolulu, Hawaii • 96826 • (808) 946-2277

APPENDIX B:

Artistic Renderings of Proposed Renovations





APPENDIX C:

SMA Exemption Status Summary
Exhibit A: Exemption Documentation
Exhibit B: Exemption Supplement

EXHIBIT A: EXEMPTION STATUS DOCUMENTATION

DIAGRAM REFERENCE NUMBER	DESCRIPTION OF WORK	APPLICABLE EXEMPTION UNDER ROH § 25-1.3				
		(F) - REPAIR OR MAINTENANCE TO EXISTING STRUCTURES	(F) - INTERIOR ALTERATIONS TO EXISTING STRUCTURES	(G) - DEMOLITION OR REMOVAL OF STRUCTURES	(P) -NONSTRUCTURAL IMPROVEMENTS TO EXISTING COMMERCIAL STRUCTURES	(N) -INSTALLATION OF UNDERGROUND UTILITY LINES AND APPURTENANT ABOVE GROUND FIXTURES
EXISTING FRONT DRIVE-UP/ BUS TURN AROUND						
1	Replace and repair old landscape/ planters, irrigation, lighting, curbs, asphalt and sidewalks around from loading dock drive to bus turnaround area	√				√
1A	Repair existing porte-cochere to decrease strong wind impacts	√				
EXISTING HOTEL LOBBY AND F&B						
2	Repair, rework existing leaking/weather damaged roof and canopy near porte-cochere; create additional opening within existing roof area and remove +/- 300sf from roof area to create landscaped area below; remove existing canopy skylight to create landscaped area below.	√				
3	Replace and/or repair window walls and storefronts	√	√			
4	Update interior finishes and circulation		√			
5	Replace damaged wind screens	√				
6	Repair spalling and cracking at Pa`akai lanai	√				
7	Repair spalling and cracking to existing stairs between restaurants	√				
8	Repair spalling and cracking on existing back stairs by Pa`akai	√				
EXISTING HOTEL POOL						
9	Repair tripping and slipping hazards on existing pool deck caused by ponding issues, cracked grout, unlevel flagstone	√				
10	Repair area beneath existing footprint of pool bar; repair rusted bar die; repair and rework roof that is delaminating	√				

DIAGRAM REFERENCE NUMBER	DESCRIPTION OF WORK	APPLICABLE EXEMPTION UNDER ROH § 25-1.3				
		(F) - REPAIR OR MAINTENANCE TO EXISTING STRUCTURES	(F) - INTERIOR ALTERATIONS TO EXISTING STRUCTURES	(G) - DEMOLITION OR REMOVAL OF STRUCTURES	(P) -NONSTRUCTURAL IMPROVEMENTS TO EXISTING COMMERCIAL STRUCTURES	(N) -INSTALLATION OF UNDERGROUND UTILITY LINES AND APPURTENANT ABOVE GROUND FIXTURES
	and showing signs of disrepair; replace wood posts that are rotting at bases.					
11	Repair exiting pool surface where plaster is delaminating	√				
12	Repair and or replace pool deck lighting and underground electrical wiring that is in disrepair	√				√
13	Interior alterations to current location of Lamont's	√	√			
14	Interior alterations to renovate existing bathrooms		√			
EXISTING COTTAGES						
15	Interiors: Install new flooring, furniture, fixtures and equipment		√			
16	Landscaping: Replace old landscaping around front entries and back lanais. Repair walkways	√			√	
17	Front Entry Lanais: Install wood planking decorative façade on front of building				√	
18	Back Lanai Extension: Remove concrete bench and add wood deck over existing concrete lanai (Note: extension will not go beyond existing roof eave line.)				√	
EXISTING HOTEL – SUPPORT FACILITIES						
19	Repair two sets of tennis courts, fencing and landscape, walkways	√			√	√
20	Repair and redefine existing employee parking and replace old landscape	√			√	
22	Replace old landscape and lighting along Kuilima Drive between existing guard shack and hotel	√			√	√
23	Replace old landscape and lighting near Kamehameha Hwy at main entrance.	√			√	√

DIAGRAM REFERENCE NUMBER	DESCRIPTION OF WORK	APPLICABLE EXEMPTION UNDER ROH § 25-1.3				
		(F) - REPAIR OR MAINTENANCE TO EXISTING STRUCTURES	(F) - INTERIOR ALTERATIONS TO EXISTING STRUCTURES	(G) - DEMOLITION OR REMOVAL OF STRUCTURES	(P) -NONSTRUCTURAL IMPROVEMENTS TO EXISTING COMMERCIAL STRUCTURES	(N) -INSTALLATION OF UNDERGROUND UTILITY LINES AND APPURTENANT ABOVE GROUND FIXTURES
24	Demolition/removal of a sprung structure to improve employee parking options and vehicular circulation			√		

Exhibit B

SITE PLAN SMA

SCALE: 1"=50'-0"

TURTLE BAY
Breathtaking. Story Making.

TBR TRANSFORMATIONAL RENOVATION
SD PROGRESS SET
10.07.2018

WCITARCHITECTURE

Wallers Kimura Maida landscape architects

RIANNA WONG

SITE PLAN - SMA

SCALE: 1/64"=1'-0"

TURTLE BAY
Breathtaking. Story Making.

TBR TRANSFORMATIONAL RENOVATION
SD PROGRESS SET
10.07.2018

WCITARCHITECTURE

Wallers Kimura Maioda
landscape architects

RIANNA WONG

Exhibit "A"

PART I: THE ADDITIONAL EXEMPT RENOVATIONS

DIAGRAM 1 REFERENCE NUMBER	DESCRIPTION OF WORK	LOCATION	LOT
A	Repair and maintenance of existing chain link fence along Kamehameha Highway, including replacement of chain link fencing with wooden fencing and placement of rock pedestal (ahu) at 4'-5' high, one at each historical ahupua'a boundary lines.	Golf Course	1, 2, 4, 5, 7, 8, 24, 25, 26
B	Installation of an underground utility line along an existing corridor (golf cart path).	Golf Course	8, 12
C	Building envelope repairs including guestroom lanai railing and sliding door replacements; and spalling and roof repairs.	Hotel	11

PART II: THE NON-EXEMPT RENOVATIONS

DIAGRAM 1 REFERENCE NUMBER	DESCRIPTION OF WORK	LOCATION	LOT
1	New porte cochere structure at front of building to become new arrival entry.	Hotel Entry	11
2	Windscreen fins made of recycled ironwood trees sourced on property ranging from 10'-14' high, 3' wide. Fins will stand upright, along either side of the porte cochere, for approximately 70' to decrease the impacts of the wind on guests using the hotel arrival area.	Hotel Entry	11
3	Exterior landscape, hardscape and planter boxes with reflecting pond extending beyond roof line. New adult/ keiki pool to replace existing slide pool.	Pool Area	11
4	New linear pool behind existing cottages outside shoreline setback.	Cottages	11
5	New trellis at cottage entry lanais.	Cottages	11
6	Cart barn extension to house additional golf carts	Cart Barn - Golf	12
7	Existing guard shack to be demolished. Installation of new rock wall and landscaping.	Kuilima Drive	10
8	Extension of rock wall at Kuilima Drive main entrance at Kamehameha Highway.	Kuilima Drive	R-4, 8, 26

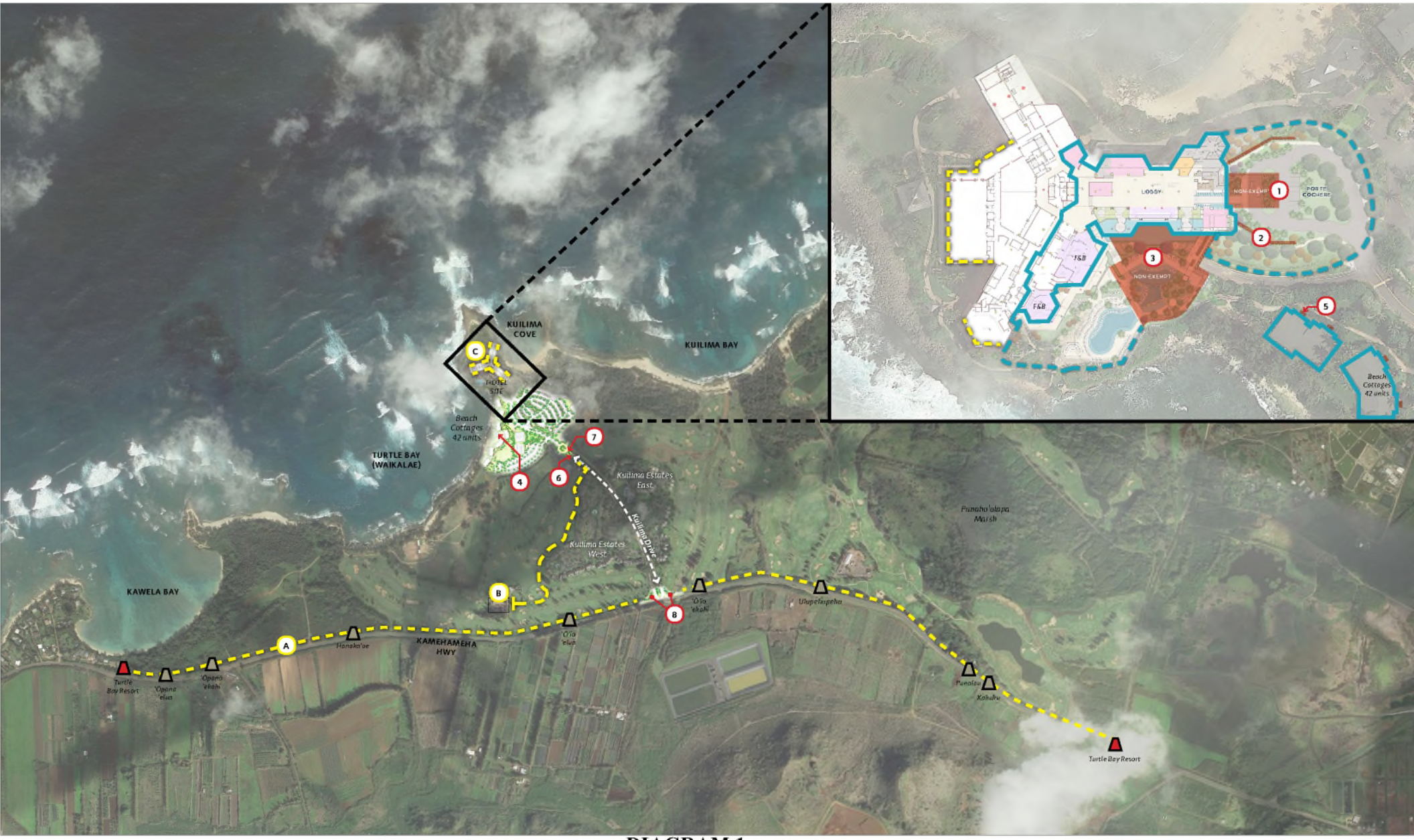


DIAGRAM 1

SMA EXEMPT DIAGRAM

RESORT SITE PLAN

TURTLE BAY
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TBR TRANSFORMATIONAL RENOVATION

PROGRESS SET

01.30.2019

WCITARCHITECTURE

Turtle Bay Resort Development

Draft Environmental Assessment