DEPARTMENT OF PLANNING AND PERMITTING
**CITY AND COUNTY OF HONOLULU**
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RICK BLANGIARDI
MAYOR

DEAN UCHIDA
DIRECTOR

DAWN TAKEUCHI APUNA
DEPUTY DIRECTOR

July 8, 2022

Mr. Randall Sakumoto
McCorriston, Miller, Mukai, MacKinnon, LLP
Five Waterfront Plaza, 4th Floor
500 Ala Moana Boulevard
Honolulu, Hawaii 96813

Dear Mr. Sakumoto:

SUBJECT: Turtle Bay Resort – Development Site RR-3

This is a follow up to your letter of February 8, 2022 requesting confirmation on the following items:

1. To the extent the need for an environmental impact statement may be triggered by the Planned Development (RR-3)* the SEIS would satisfy such a requirement, and therefore no further environmental impact statement will be required; and
2. The Planned Development (RR-3) * is permitted under the 1986 MSP, and therefore no new SMA permit will be required.

**Note: RR-3 consisted of two development sites: (1) "A-2" (23 acres), which was to be developed with 345 residential condominium units; (2) "H-3" (22 acres) and was to be developed with a 350-unit hotel. Both projects are permitted to have a maximum height of 90'. In comparison, the proposed updated plans for RR-3 call for the development of only 90 residential condominium units, spread out over RR-3 in 20 low rise buildings, with no building exceeding 65 ft. in height.*

A supplemental Environmental Impact Statement (SEIS) was approved in October 2013. The need for the Final SEIS was stated as follows:

> "The real estate markets and buyer's perception of value have undergone significant changes since the original EIS for the Resort was completed in 1985. As such, the highest and best development opportunity for resort residential and hospitality development at the Resort has changed significantly. TBR's market analyst/consultant concludes that the Full Build-Out Alternative of the Resort envisioned in 1985 is currently NOT a financially viable scenario due to changes in market conditions. The density of development and the total number of units in the Full Build Out Alternative were predicated upon creating sufficient mass for the development to create economies of scale. But comparable projects completed elsewhere in Hawai'i since 1985 have demonstrated that success can be achieved at a reduced scale." (Page 1-2, FEIS Turtle Bay Resort, 2013)

The Final SEIS identified a proposed site RR-3a and RR-3b as "Resort Residential" use with a projected maximum unit count of 100 units. Currently, the RR-3 site is comprised of 32.976 acres (TMK 5-7-001:050) presently zoned Resort, and consists of Development Sites H-3 (Hotel), A-2 (Condominium), and portions of areas designated Golf Course 2 which were approved under the Special Management Area (SMA) permit in 1986. (See Exhibits 1, 2, and 3.)

The Final SEIS contained a proposal for a "full build-out alternative", which proposed a much more substantial build out than the current proposal. Thus, the potential environmental impacts considered by the Final SEIS were much greater than the environmental impacts of the current proposal. Therefore, we find that the current proposal:

1. Is a component of or is substantially similar to the action proposed in the Final SEIS; and
2. Is anticipated to have direct, indirect, and cumulative effects similar to those analyzed within the range of alternatives in the Final SEIS; and
3. Was analyzed within the range of alternatives in the Final SEIS.

With respect to the SMA permit originally approved in 1986, the SMA permit identified twenty-two (22) Development Sites over the entire 808 acres of the Turtle Bay Resort Campus.

| DEVELOPMENT SITES | ACRES | UNITS/ACRE | TOTAL UNITS | TOTAL UNITS IN SMA |
|---|---|---|---|---|
| H-1 | 20 | 32 | 640 | 650 |
| H-2 | 21 | 17 | 357 | 350 |
| H-3 | 22 | 16 | 352 | 350 |
| H-4 | 7 | 14 | 98 | 100 |
| A-1 | 43 | 14 | 602 | 613 |
| A-2 | 23 | 15 | 345 | 345 |
| A-3 | 22 | 13 | 286 | 285 |
| A-4 | 23 | 13 | 299 | 299 |
| A-5a | 13 | 13 | 169 | 169 |
| A-5b | 6 | 13 | 78 | 78 |
| A-6 | 13 | 13 | 169 | 169 |
| A-7 | 7 | 15 | 105 | 105 |
| EXISTING HOTEL | 26 | | 457 | 457 |
| TOTAL | 246 | 188 | 3957 | 3970 |

| DEVELOPMENT SITES | ACRES |
|---|---|
| P-1-PARK | 408 |
| P-2 PARK | 37 |
| P-3-BIRD SANCTUARY PRIVATE PARK | 6 |
| P-4-PRIVATE PARK | 2 |
| C-1-COMMERCIAL | 9 |
| G-1-GOLF COURSE | 152 |
| G-2-GOLF COURSE | 198 |
| CH-1-CLUBHOUSE | 5 |
| MARSH | 100 |
| EQUESTRIAN CENTER | 10 |
| TOTAL | 927 |

The 1985 SMA Permit application stated the following:

"Project designs for the hotel site (H-2), a condominium site (A-1), the commercial center (C-1), the two golf courses (G-1 and G-2), the two private parks (P-3 and P-4), and Punahoolapa Marsh have been completed to a sufficient degree to provide all of the information required for the final SMA approval. For other projects, design details are still to be developed. General Building envelopes are provided, and the SMA approval subject to design review and approval by the Department of Land Utilization is requested."

Typically, we approve master planned projects based on conceptual designs and/or plans which allow for modifications as market conditions change. Hoopili and Koa Ridge are examples of master planned projects that are being developed over a number of years.

In the approved SMA permit, development sites H-3 and A-2 would have allowed up to 350 units and 345 units respectively for a total of 695 combined units. The proposed development of these two development sites as the new RR-3 site would reduce the density to ninety (90) residential condominium units in twenty (20) low rise buildings with a maximum height of sixty-five (65) feet which is twenty-five (25) feet lower than was allowed on the H-3 and A-2 development sites. In addition, the location of the units are intended to minimize the impact of 2.0 and 3.2 feet sea level rise as shown on Exhibit 4. Finally, use of residential condominiums as short term vacation rental units is a permitted use in the Resort zoned districts and therefore would be consistent with the Hotel/Apartment development sites contained in the SMA approval.

Thus, similar to the situation with the Supplemental Final Environmental Impact Statement, the original SMA permit considered a master planned project that was significantly greater in intensity and density than what is currently proposed. As such, we find that the current proposal is of a lower density and intensity than what was assessed in the FEIS and permitted in the SMA permit.

We trust that this response addresses your concerns. Should you have any questions or require any additional information, please feel free to contact me at (808) 768-8000.

Sincerely,

Dean Uchida
Director

Attachments

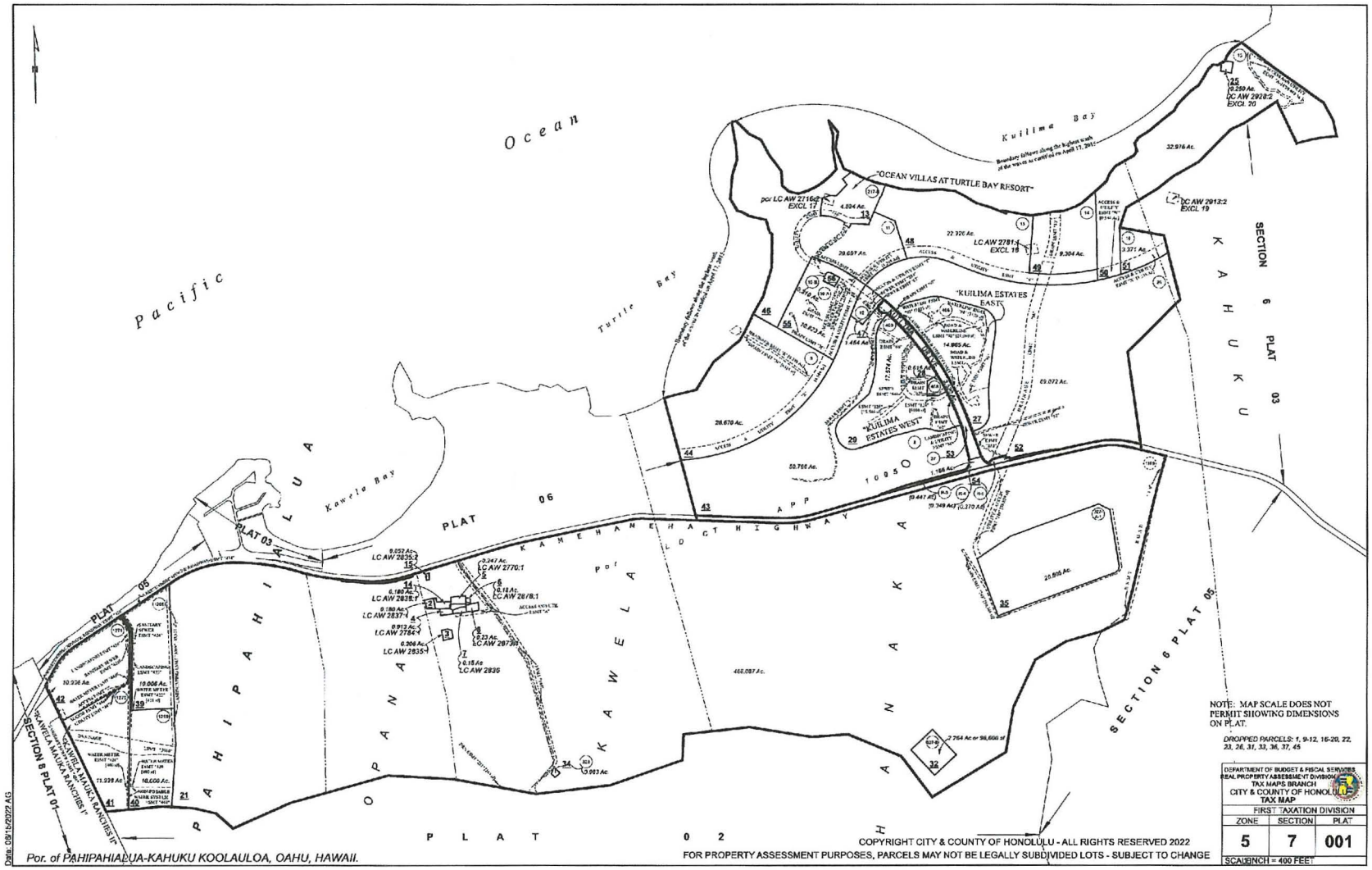

Pacific
Ocean
Kuilima Bay
Turtle Bay
Kawela Bay
"OCEAN VILLAS AT TURTLE BAY RESORT"
"KUILIMA ESTATES EAST"
"KUILIMA ESTATES WEST"
KAMEHAMEHA HIGHWAY
SECTION 6 PLAT 03
KAHUKU
PLAT 06
PLAT 05
PLAT 03
PAHIPAHIALUA
KAWELA
PLAT 02
SECTION 8 PLAT 01
SECTION 6 PLAT 05
NOTE: MAP SCALE DOES NOT PERMIT SHOWING DIMENSIONS ON PLAT.
DROPPED PARCELS: 1, 9-12, 16-20, 22, 23, 26, 31, 33, 36, 37, 45
DEPARTMENT OF BUDGET & FISCAL SERVICES
REAL PROPERTY ASSESSMENT DIVISION
TAX MAPS BRANCH
CITY & COUNTY OF HONOLULU
TAX MAP
FIRST TAXATION DIVISION
ZONE 5 SECTION 7 PLAT 001
SCALE: 1 INCH = 400 FEET
COPYRIGHT CITY & COUNTY OF HONOLULU - ALL RIGHTS RESERVED 2022
FOR PROPERTY ASSESSMENT PURPOSES, PARCELS MAY NOT BE LEGALLY SUBDIVIDED LOTS - SUBJECT TO CHANGE
Por. of PAHIPAHIALUA-KAHUKU KOOLAULOA, OAHU, HAWAII.
Date: 09/15/2022 AG

EXHIBIT 1

| DESIGNATION | ACRES | APPROX. UNITS/ ACRE | TOTAL |
|---|---|---|---|
| H-1 | [illegible] | [illegible] | [illegible] |
| H-2 | [illegible] | [illegible] | [illegible] |
| H-3 | [illegible] | [illegible] | [illegible] |
| H-4 | 7 | [illegible] | [illegible] |
| A-1 | [illegible] | [illegible] | [illegible] |
| A-2 | [illegible] | [illegible] | [illegible] |
| A-3 | [illegible] | [illegible] | [illegible] |
| A-4 | [illegible] | [illegible] | [illegible] |
| A-5a | [illegible] | [illegible] | [illegible] |
| A-5b | [illegible] | [illegible] | [illegible] |
| A-6 | [illegible] | [illegible] | [illegible] |
| A-7 | 7 | [illegible] | [illegible] |
| EXISTING HOTEL | [illegible] | | [illegible] |
| | | | [illegible] |

| DESIGNATION | ACRES | USE |
|---|---|---|
| P-1 | 4.8 | PARK |
| P-2 | 37 | PARK |
| P-3 | 6 | BIRD SANCTUARY PARK (PRIVATE) |
| P-4 | 2 | PARK (PRIVATE) |
| C-1 | 9 | COMMERCIAL |
| G-1 | [illegible] | GOLF COURSE |
| G-2 | [illegible] | GOLF COURSE |
| CH-1 | 6 | CLUBHOUSE |
| MARSH | [illegible] | PRESERVE |
| EQUESTRIAN CENTER | 10 | AGRICULTURE |

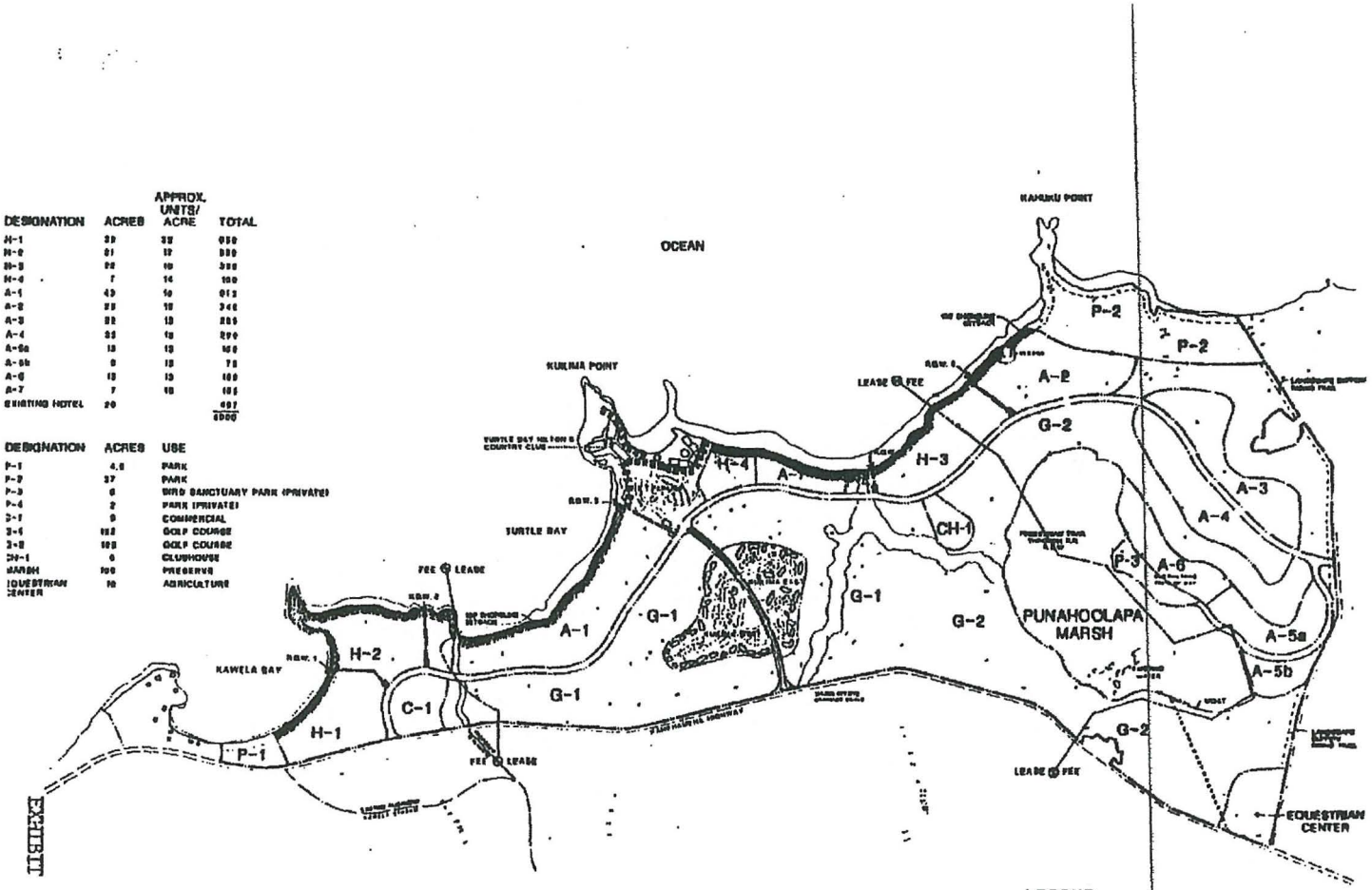



EXHIBIT 1

**LEGEND**

100' Shoreline Setback

Access thru Existing Hotel

# TURTLE BAY RESORT

KUILIMA DEVELOPMENT COMPANY

• BASE MAP
• MASTER PLAN

GROUP 70
ARCHITECTS AND PLANNERS

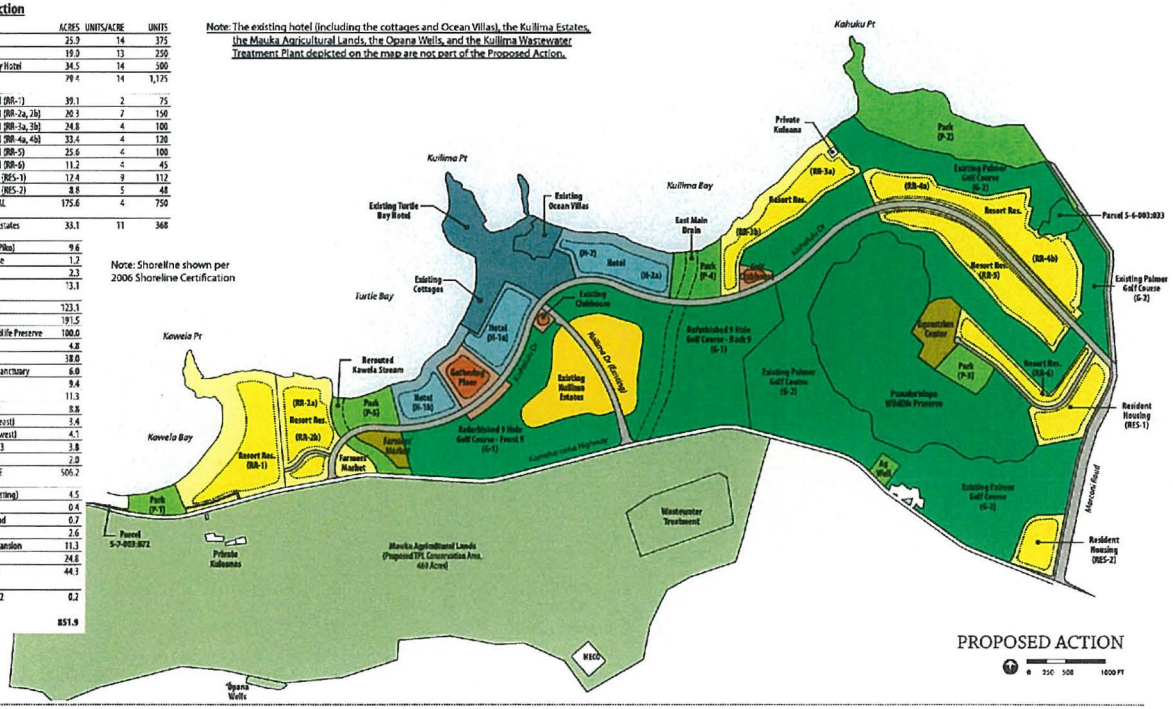
EXHIBIT 2

## Proposed Action

| AREA | ACRES | UNITS/ACRE | UNITS |
|---|---|---|---|
| Hotel (H-1a, 1b) | 25.9 | 14 | 375 |
| Hotel (H-2, 2a) | 19.3 | 13 | 250 |
| Existing Turtle Bay Hotel | 34.5 | 14 | 500 |
| TOTAL HOTEL | 79.4 | 14 | 1,125 |
| Resort Residential (RR-1) | 39.1 | 2 | 75 |
| Resort Residential (RR-2a, 2b) | 20.3 | 7 | 150 |
| Resort Residential (RR-3a, 3b) | 24.8 | 4 | 100 |
| Resort Residential (RR-4a, 4b) | 33.4 | 4 | 120 |
| Resort Residential (RR-5) | 25.6 | 4 | 100 |
| Resort Residential (RR-6) | 11.2 | 4 | 45 |
| Resident Housing (RES-1) | 12.4 | 9 | 112 |
| Resident Housing (RES-2) | 8.8 | 5 | 48 |
| TOTAL RESIDENTIAL | 175.6 | 4 | 750 |
| Existing Kuilima Estates | 33.1 | 11 | 368 |
| Gathering Place (Piko) | 9.6 | | |
| Existing Clubhouse | 1.2 | | |
| New Clubhouse | 2.3 | | |
| TOTAL OTHER | 13.1 | | |
| Golf Course (G-1) | 123.1 | | |
| Golf Course (G-2) | 191.5 | | |
| Punahoolapa Wildlife Preserve | 100.0 | | |
| Park (P-1) | 4.8 | | |
| Park (P-2) | 38.0 | | |
| Park (P-3) - Bird Sanctuary | 6.0 | | |
| Park (P-4) | 9.4 | | |
| Park (P-5) | 11.3 | | |
| Equestrian Center | 8.8 | | |
| Farmers' Market (east) | 3.4 | | |
| Farmers' Market (west) | 4.1 | | |
| Parcel 5-6-003:033 | 3.8 | | |
| AG Well (Lot 524) | 2.0 | | |
| TOTAL OPEN SPACE | 506.2 | | |
| Kuilima Drive (Exititing) | 4.5 | | |
| P-1 Access Road | 0.4 | | |
| RR-1/2 Access Road | 0.7 | | |
| Equestrian Road | 2.6 | | |
| Marcond Road Expansion | 11.3 | | |
| Kaihalulu Drive | 24.8 | | |
| TOTAL ROADWAYS | 44.3 | | |
| Parcel 5-7-003:072 | 0.2 | | |
| **TOTAL SITE** | **851.9** | | |

Note: The existing hotel (including the cottages and Ocean Villas), the Kuilima Estates, the Mauka Agricultural Lands, the Opana Wells, and the Kuilima Wastewater Treatment Plant depicted on the map are not part of the Proposed Action.

Note: Shoreline shown per 2006 Shoreline Certification




PROPOSED ACTION

0 250 500 1000 FT

WCITARCHITECTURE

**TURTLE BAY RESORT ~~MASTER PLAN~~ EXPANSION**

07.31.2012 |

EXHIBIT 3

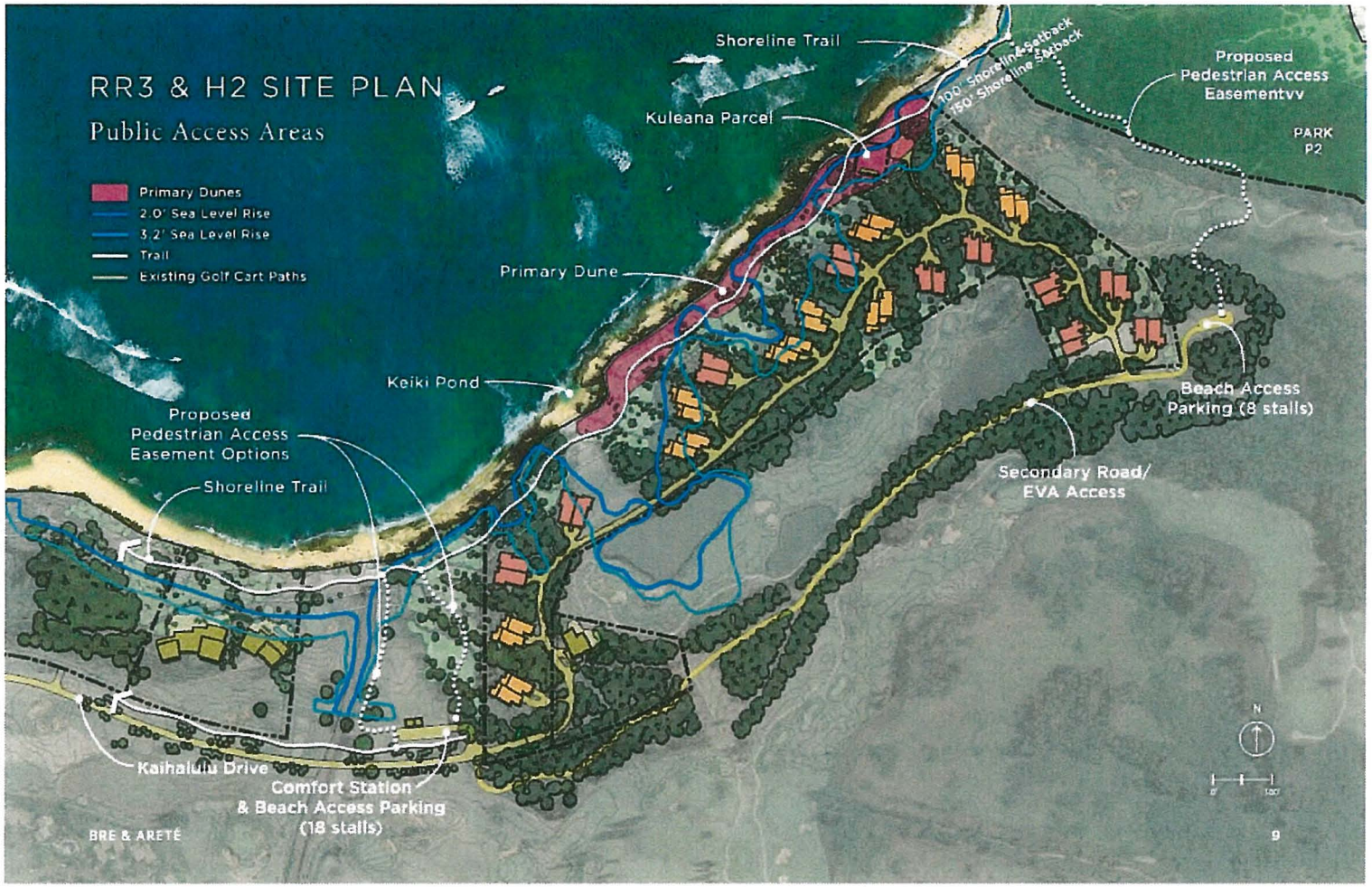



EXHIBIT 4

428552.3