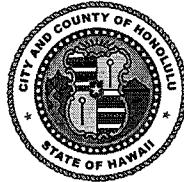


**DEPARTMENT OF PLANNING AND PERMITTING
KA 'OIHANA HO'OLĀLĀ A ME NĀ PALAPALA 'AE
CITY AND COUNTY OF HONOLULU**

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December 8, 2025

GEN-2025-50 (MS)

Mr. Randall F. Sakamoto
McCorriston Miller Mukai MacKinnon LLP
P.O. Box 2800
Honolulu, Hawai'i 96803

Dear Mr. Sakamoto:

**SUBJECT: Request for Confirmation
Turtle Bay Resort (TBR) - Development Site H-1 (H-1 Plan)
Tax Map Keys (TMKs) 5-7-001:044, 5-7-001: 055, and 5-7-006: 029**

This is in response to your letter, received August 8, 2025, requesting confirmation from the Department of Planning and Permitting (DPP) on the following items:

1. To the extent the need for environmental review may be triggered by the proposed Development Site H-1, the Final Supplemental Environmental Impact Statement (SEIS), accepted by the DPP on October 3, 2013, would satisfy such a requirement, and therefore no further environmental review under Hawai'i Revised Statutes (HRS) Chapter 343 will be required; and
2. The proposed Development Site H-1 is allowed under the Special Management Area (SMA) Permit (File No. 86/SMA-45), approved by City Council under Resolution No. 86-308, and therefore no new SMA permit will be required.

According to your letter, the proposal will consist of a new hotel, operated primarily as a full-service hotel. The hotel will include up to 375 units, fitness center, spa, retail, and eating establishments. The Development Site H-1 is comprised of TMKs 5-7-001: 044, which has a lot area of 28.67 acres, 5-7-001: 055, which has a lot area of 10.83 acres, and 5-7-006: 029 which has a lot area of 9.77 acres. The parcels are located in B-1 Community Business District and Resort District.

The proposed action in the Final SEIS identified the Development Site H-1 as H-1a and H-1b. The development evaluated as the “preferred alternative” in that area included a “Hotel” use with a projected unit count of 375 units and a maximum height of 90 feet, and the “Gathering Place” use which consists of both indoor and outdoor space (see Exhibit A). According to the Final SEIS the “ownership structure is likely to be condominium, but could be a traditional hotel or timeshare.”

The 2013 Final SEIS included the following statement:

“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, Final SEIS Turtle Bay Resort, 2013)

The Final SEIS also evaluated a proposal for a “full build-out alternative,” which proposed a much more substantial build out than the current proposal. In this full build-out alternative, the proposed Development Site H-1 was referred to as H-3 and was identified as containing 530 units (see Exhibit B). Thus, the potential environmental impacts considered by the Final SEIS were much greater than the environmental impacts of the current proposal of 350 units. Therefore, we find that the current proposal:

1. Is a component of or is substantially similar to the action proposed in the Final SEIS;
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 22 development sites over the entire 808 acres of the TBR Campus. In the 1986 SMA Permit, the proposed Development Site H-1 was referred to as A-1 and the H-2 site was proposed to be the “hotel” development adjacent to the A-1 site (see Exhibit C). The 1986 SMA Permit application stated the following:

"Project design 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."

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	3,957	3,970

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

Typically, we approve master planned projects based on conceptual designs and/or plans which allow for modifications as market conditions change. In the approved 1986 SMA Permit, sites H-2 and A-1 would have allowed up to 350 and 613 units, respectively, for a total of 963 units. In the A-1 site, the units would have been designed in two- to 10-unit structures. Compared to the 1986 SMA Permit, the current proposed development of the proposed Development Site H-1 would reduce the density to 375 units. According to preliminary conceptual drawings you provided, the structures would be designed to preserve the primary sand dunes and are located at a minimum 150 feet

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from the shoreline. Additionally, the location of the proposed development is designed not to interfere with the required shoreline easement and pedestrian way easements, and is intended to minimize the impact of 2.0 and 3.2 feet of anticipated sea level rise. Finally, the site identified as the H-2 site in the 1986 SMA Permit is currently State owned conservation lands and will no longer be developed as part of the TBR campus.

Thus, similar to the situation with the Final SEIS, 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 Final SEIS and permitted in the SMA Permit.

This letter is not a disclosure statement nor is it intended to substitute for mandatory disclosures in real estate transactions regarding the subject parcel. The City is under no obligation to investigate, research, or participate in the preparation of disclosure statements other than providing available public records. This letter does not create liability on the part of the City, or any officer or employee thereof, if used in or as a disclosure statement. The seller, buyer, lender, or their agent, not the City, is solely responsible for the use of any public record information in the preparation of a disclosure statement.

Should you have any questions, please contact Malynne Simeon, of our Zoning Regulations and Permits Branch, at (808) 768-8023 or via email at msimeon@honolulu.gov.

Very truly yours,



Dawn Takeuchi Apuna
Director

Enclosures: Exhibits A through C

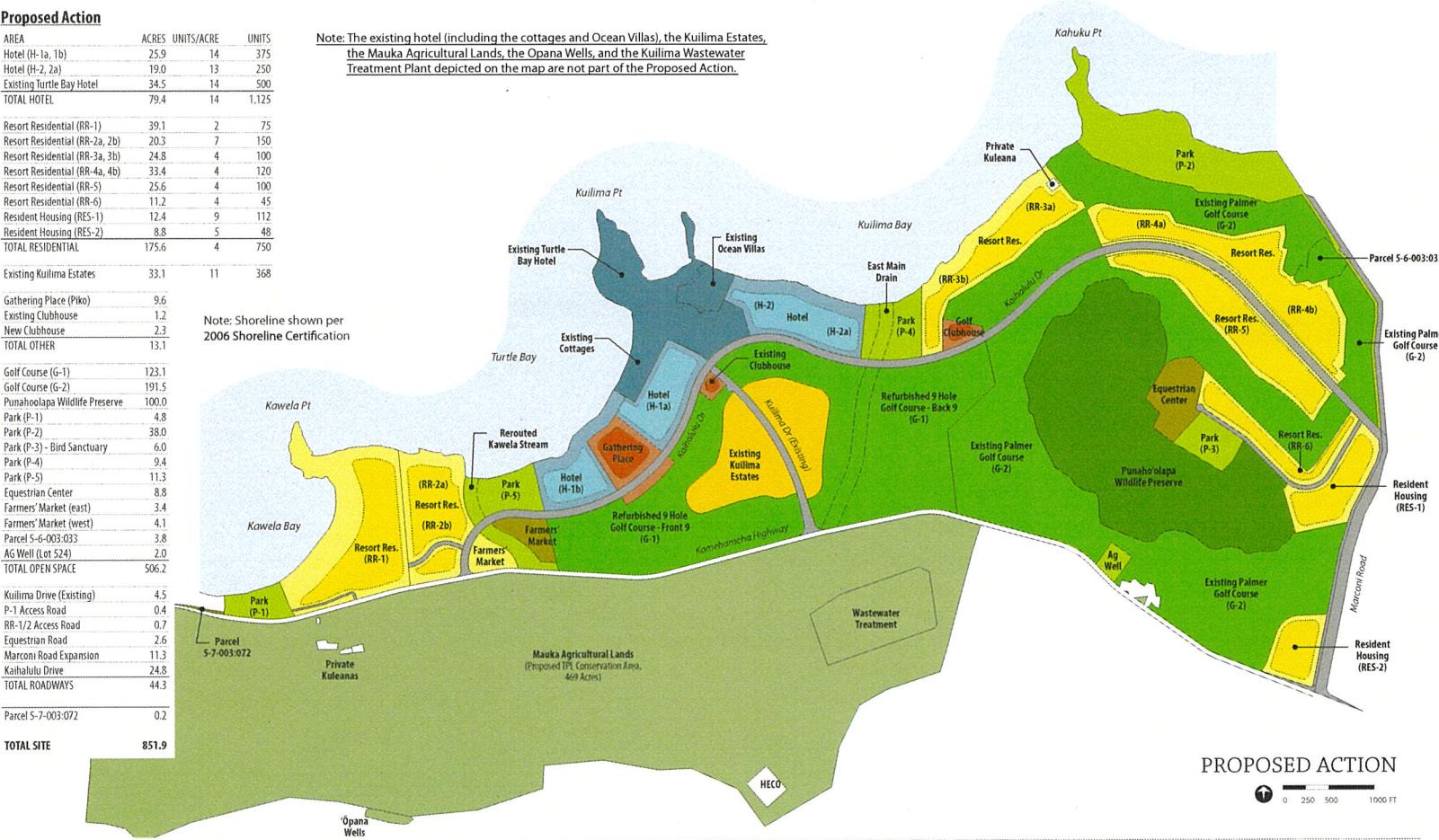
Exhibit A

Figure ES-1:

Proposed Action

AREA	ACRES	UNITS/ACRE	UNITS
Hotel (H-1a, 1b)	25.9	14	375
Hotel (H-2, 2a)	19.0	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 Kualima 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		
Punahoaola 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 S-6-003:033	3.8		
AG Well (Lot 524)	2.0		
TOTAL OPEN SPACE	506.2		
Kualima Drive (Existing)	4.5		
P-1 Access Road	0.4		
RR-1/2 Access Road	0.7		
Equestrian Road	2.6		
Marconi Road Expansion	11.3		
Kaihalulu Drive	24.8		
TOTAL ROADWAYS	44.3		
Parcel S-7-003:072	0.2		
TOTAL SITE	851.9		

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



WCIT ARCHITECTURE



07.31.2012 |

TURTLE BAY RESORT MASTER PLAN EXPANSION

Exhibit B

Figure 4-1: Full Build-Out Alternative

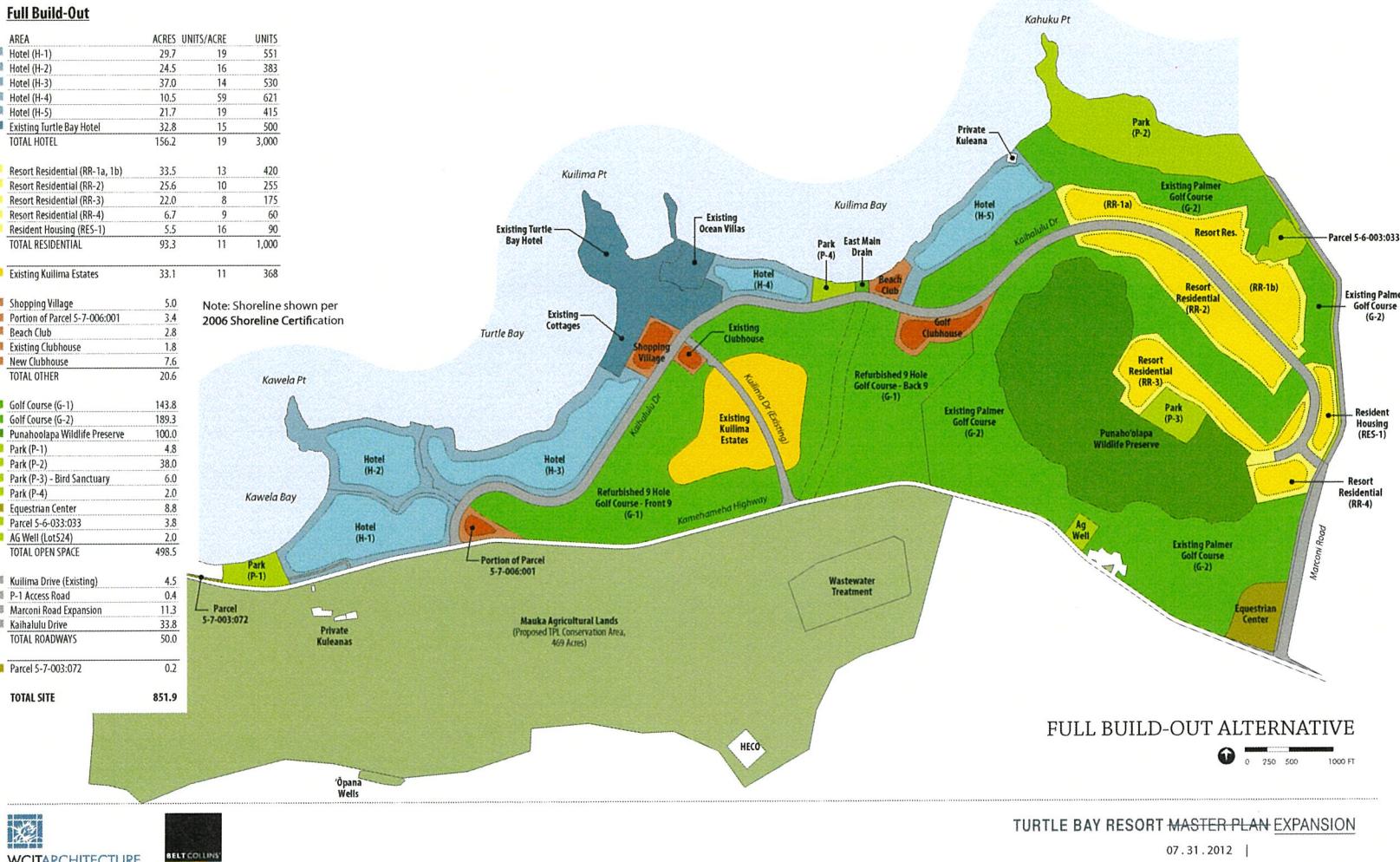


Exhibit C

DESIGNATION	ACRES	APPROX. UNITS/ACRE	TOTAL
H-1	10	30	300
H-2	11	17	187
H-3	10	10	100
H-4	7	14	98
A-1	43	10	430
A-2	23	10	230
A-3	27	10	270
A-4	15	10	150
A-5	10	10	100
A-6	10	10	100
A-7	7	10	70
EXISTING HOTEL	24		480
			487
			4870

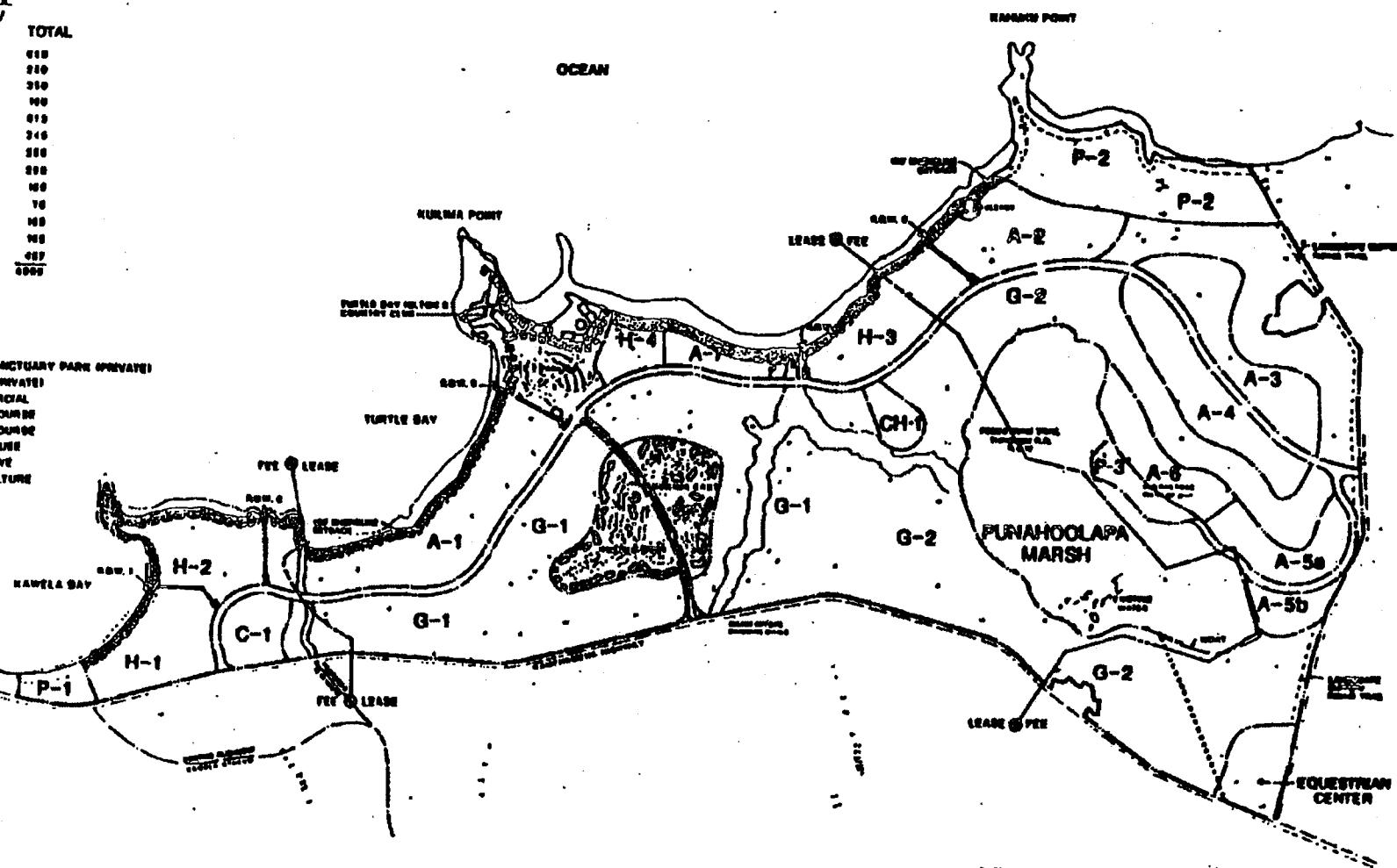
DESIGNATION	ACRES	USE
P-1	4.0	PARK
P-2	37	PARK
P-3	0	BIRD SANCTUARY PARK (PRIVATE)
P-4	0	PARK (PRIVATE)
C-1	0	COMMERCIAL
G-1	102	GOLF COURSE
G-2	100	GOLF COURSE
CH-1	10	CLUBHOUSE
MARSH	100	PRESERVE
EQUESTRIAN CENTER	10	AGRICULTURE

EXHIBIT

H

TURTLE BAY RESORT
KUILIMA DEVELOPMENT COMPANY

BASE MAP
MASTER PLAN



LEGEND

- 100' Shoreline Setback
- Access thru Existing Hotel

GROUP 70 