STATE OF HAWAI'I DEPARTMENT OF LAND AND NATURAL RESOURCES OFFICE OF CONSERVATION AND COASTAL LANDS Honolulu, Hawai'i

180-Day Exp. Date: December 06, 2014

November 14, 2014

Board of Land and Natural Resources State of Hawai'i Honolulu, Hawai'i

REGARDING:

Conservation District Use Application (CDUA) OA-3718 for the Camp Pūpūkea Master Plan

APPLICANT/ LANDOWNER:

Boy Scouts of America Aloha Council State of Hawai'i

LOCATION: Tax Map Keys:

LAND AREA:

Approximately (≈) 64.8-acres

59-780 Pūpūkea Road, Haleiwa, Koʻolau Loa, Oʻahu,

 \approx 2.0-acres State remnant parcel between parcel 2 and 77 (i.e. road)

SUBZONE:

Resource and General

(1) 5-9-005:002 & 077

DESCRIPTION OF AREA AND CURRENT USE (Exhibits 1 and 2)

Camp Pūpūkea is situated along the top of Kaleleiki Gulch at the end of Pūpūkea Road in the town of Haleiwa, Koʻolau Loa District on the island of Oʻahu, on property noted as Tax Map Keys:(1) 5-9-005:002 & 077 with a remnant State parcel (road) between parcel 2 and 77.

Camp Pūpūkea lies within the Resource and General Subzone of the Conservation District. The site is triangular in shape, bound by Pūpūkea Road to the south, the Kahuku Training Area to the north northeast, and the Pūpūkea-Paumalū Homesteads and the State Park Reserve to the north northwest.

In 1927, the U.S. Army acquired the site via a Presidential Executive Order. The U.S. military used the land to build the Pūpūkea Military Reservation as part of the U.S. Army Fleet Defense System. The Camp remained active until the end of World War II.

Camp Pūpūkea has been used by the Boy Scouts for overnight camping and recreational use since the early 1960s. This former military training area is the largest and busiest Boy Scout activity center in the Pacific. Its summer camp program plays host to troops from throughout Hawai'i and the United States Mainland.

Natural Features

Pākūlena Stream and Kālunawaika'ala Stream both originate within the boundaries of Camp Pūpūkea and continue *makai* of the property in its natural state. Both streams are perennial. Intermittent surface water runoff associated with heavy rainfall drains through these stream beds. Mean annual rainfall in the area amounts to 62 inches with each month seeing at least three inches. Elevations range from approximately 850 to 970 feet above mean sea level, with an average slope of approximately six percent in an east-west, *mauka* to *makai* direction.

The site overlies the Kawailoa Aquifer System. The Kawailoa Aquifer has a sustainable yield of 29 million gallons per day (mgd) and belongs to a designated ground water management area. Groundwater in the region occurs as a freshwater lens and recharge occurs naturally through direct rainfall infiltration and groundwater inflow from adjacent areas. Discharge is by outflow to springs and the ocean and withdrawals from wells and shafts.

The camp is densely forested except for clearings around camp facilities. The flora survey indicated that the project area is dominated by non-native species such as Swamp Mahogany and Strawberry Guava with 15 native plant species, none were considered rare. No Endangered or Threatened plant species were found during the flora survey, nor were any plant species seen that are candidates for such status. Most of these were found on the ridge top along the east side of the camp that overlooks Paumalū Gulch.

Fauna was described as sparse and mostly non-native, with the exception of the endangered endemic Hawaiian Bat. It is believed there may be a significant population of the 'Ōpe'ape'a in the vicinity of the campgrounds.

Historic Features

The archeological inventory survey indicated collected materials were historic primarily associated with the U.S. Army Fleet Defense with the absence of traditional-type cultural materials. Archival and documentary research was conducted for the cultural impact assessment and outreach to a number of individuals for consultation was completed.

Access and Utilities

Vehicular access to the site is at the mauka terminus of Pūpūkea Road that continues as an unpaved road through Camp Pūpūkea. Access to the State Park Reserve is generally gained via the main road through Camp Pūpūkea. This main camp road extends from Pūpūkea Road to the boundary of Camp Pūpūkea and Pūpūkea-Paumalū State Park Reserve where there is a gate. The road then continues into the Pūpūkea-Paumalū State Park Reserve from the gate.

No public wastewater system currently services the area and porta potties are in use at the camp. Electricity and water are available to the site. Water is provided to the site from the Board of Water Supply's (BWS) reservoir at an elevation of 890-feet. A BWS water meter and Boy Scouts pump is located adjacent to the reservoir site. The Boy Scouts pump system pumps the water up Pūpūkea Road to two 3,000 gallon water storage tanks located at the southeast corner of a cleared parking area. According to the applicant, these

tanks, which are nine-ft. high and at an elevation of 980-ft., provide adequate storage to the camp.

From the water tanks, a two-inch line exits the tanks and splits into two lines – a 1.5-inch line that feeds the ranger house, the camp director building, the camp master building, the swimming pool and the Weinberg Lodge and a two inch line that services the health center, the quarter master building, shower buildings and the many hosebibs and drinking fountains located throughout the camp sites. Regarding water usage, according to the applicant, a higher usage occurs in the months of July and August when average demand was approximately 8,800 gallons per day.

Camp Pūpūkea is comprised of various cabins, campsites and outdoor physical fitness and recreational facilities. **Exhibits 3 and 4** illustrate and list facilities at Camp Püpükea. The Boy Scouts of America, Aloha Council serves over 12,960 registered Scouts in over 684 Cub Scout Packs, Boy Scout Troops, Varsity Scout teams, Venture Crews, Explorer Posts, and Learning for Life groups sponsored by 360 businesses, churches, schools, and community service organizations.

PROPOSED USE

Improvements are proposed in three phases over 20 + years.

Phase I (Exhibit 5)

Phase I will see infrastructure and other improvements including:

- Wastewater system improvements, including five comfort stations with modern toilets and showers
- Water system improvements
- Electrical system improvements
- A junior staff lodging and family cabins complex consisting of five buildings.
- An improved main camp road that will provide fire protection access and improved access to the Pūpūkea-Paumalū State Park Reserve
- An improved parking area at the entrance to the camp with space for 40 vehicles
- Archery/rifle range improvements as necessary in conformance with National Rifle Association (NRA) and Boy Scouts of America (BSA) Shooting Sports standards

The most significant improvement in Phase I will be the construction of five new comfort stations connected to Individual Wastewater Systems. The comfort stations will include modern toilets and showers and will replace the existing portable toilets and shower facilities. The Department of Health approved the Boy Scouts' 20 Individual Wastewater System Applications, authorizing the installation of the septic tanks and associated infrastructure. There will be 4 septic tanks for each comfort station. The total estimated wastewater flow of the 20 septic tanks is approximately 20,000 gallons per day. As of August 2014, all large capacity cesspools have been backfilled and formally closed.

Any grading necessary will be kept to a minimum to maintain the existing natural state as much as possible and to keep adjacent lands undisturbed. Clearing and grading will be necessary for the shower/comfort station buildings, leach fields for the individual wastewater systems, the junior staff lodging and family cabins complex, and other improvements in subsequent phases. New buildings in the junior staff lodging and family cabins complex will be of post and pier construction that will not require grading under the floor.

The water system upgrade will include an expansion of the system serving the Weinberg lodge and upper buildings to include the family cabin area and associated shower/comfort station. In addition, a new PVC water line will be designed to replace the existing gravity, galvanized water line system that connects to the two 3,000 storage tanks.

The camp's water demand may increase slightly due to the new toilet and shower facilities. However, where financially and structurally possible, the Boy Scouts plan to use water efficient fixtures to improve water efficient practices. The Boy Scouts also plan to implement alternative water sources, wherever possible.

Rifle Range

Regarding the archery/rifle range, as necessary the range will be upgraded according to National Rifle Association (NRA) and Boy Scouts of America (BSA) Shooting Sports standards. The NRA and the BSA have worked together since 1910. The range is operated in accordance with the Boy Scouts of America National Shooting Sports Manual, which sets out proper safeguards for shooting activity and ensures a safe environment for youth and adults participating in shooting sports.

At Camp Pūpūkea the Boy Scouts use .22 caliber firearms exclusively, which calls for an 18 foot backstop and nine foot side berms to prevent over-fires. Using the Boy Scouts methods of shooting-where Scouts fire from a bench rest position with the front stock of the gun on a rest-the possibility of over-firing is eliminated. The Boy Scouts operate the Camp Pūpūkea range primarily during the summer season, with occasional operations throughout the rest of the year. The range is open 8:00am to 6:00pm during the days it is in use. The operating days and times are not expected to change in the future.

The upgraded range will use a system of bullet traps to trap the majority of fired bullets so that lead can be collected and disposed of properly. The Boy Scouts will also consider the use "green ammo" to provide further protection from the disposition of environmentally harmful metals.

According to the applicant, a .22 caliber rifle creates a 152dB pop. The range is at least 500 feet from any home or public roadways. In an open field, with no noise restrictions, at that distance, the noise level would be less than 60dB, which falls well below Occupational Safety and Health Administration (OSHA) permissible noise levels. With the surrounding tree and brush cover of Camp Pūpūkea, noise from the range is indiscernible from roadways and homes.

Camp Road Improvements

An existing unpaved road through Camp Pūpūkea will be upgraded to comply with Honolulu Fire Department (HFD) requirements for fire access. The existing road begins at Pūpūkea Road, runs through the parking area, follows the slope down ridge to the lowest camp site, and then continues downslope to provide access to the Pūpūkea-

4

Paumalū State Park Reserve. Due to HFD requirements, the applicant is proposing to widened the road to provide for a continuous minimum width of 16-feet and a fire truck turnaround area before the road continues to the Pūpūkea-Paumalū State Park Reserve. An additional unpaved roadway begins in the vicinity between the health lodge and the trading post and follows the DLNR roadway remnant down the north side and around the campfire bowl area. Should other buildings be constructed further along this roadway, the dirt road will also have to be widened to 16 feet wide and improved to meet HFD fire code requirements.

It is estimated that Phase I will be completed by 2017.

Phase II (Exhibit 6)

Phase II improvements are more mid-range in nature and are proposed to include:

- Replacement and/or upgrades of the health lodge, swimming pool showers, camp director cabins, and ranger residence
- A new welcome center
- New multi-use pavilions
- A new nature facility (replaces existing nature hut)
- A new handy tool craft area
- Relocation of the craft pavilion and ropes courses
- New climbing center/zip line

It is estimated that Phase II will be completed by 2020.

Phase III (Exhibit 7)

Phase III improvements are long-range in nature and will depend on the availability of funding. Phase III improvements include new programs, facilities, and additional campgrounds primarily in the south west portion of the camp, including:

- A new environmental education/training center
- Additional campground areas
- A mountain bike path
- Additional parking areas

It is estimated that Phase III will be completed by 2030 or later.

Feasible measures to promote energy conservation and environmental stewardship, such as standards and guidelines promulgated by the United States Green Building Council (USGBC), the United States Environmental Protection Agency (EPA), or other similar programs will be implemented. Sustainable design practices will be incorporated as applicable, including consideration for the following:

- Buildings to take advantage of natural light, ventilation, and trade winds.
- Manage and divert storm water on site to reduce flooding and runoff.
- Provide ADA access as required.

- Plan for and design social gathering spaces.
- Provide a system of pedestrian paths.
- Make room for composting on site.
- Provide motion sensor lighting.

Construction Impacts and Mitigation

Impacts to the soils include potential for soil erosion and the generation of dust during grading and construction are expected. All construction activities will comply with all applicable Federal, State, and County regulations and rules for erosion control. Contractors will use best management practices (BMPs) to minimize erosion during construction and planting. In the long term, proposed landscaping will mitigate the potential of soil erosion from wind and water runoff.

Limited tree and vegetation removal may be necessary for some of the proposed improvements to Camp Pūpūkea, especially related to the leach field creation necessary for the upgrades to the wastewater system. Areas where tree removal is necessary will be quickly re-vegetated to prevent erosion. Woody plants greater than 15-feet tall shall not be disturbed, removed, or trimmed during the bat birthing and pup rearing season (June 1 through September 15).

Because of Camp Püpükea's visually remote location, it is believed the proposed facility upgrades will have no effect on visual resources. Views from the camp site-both *mauka* and *Makai*-will still be severely restricted by forest trees, which prevent any coastal views. Similarly, the tall vegetation will continue to block views of the camp site from lower elevations.

Any increases in ambient noise levels due to the upgrades are primarily limited to shortterm construction activity. However because of the remote location of the camp, with relatively few nearby neighbors, any noise from construction is likely not to cause any annoyances. In addition, noise from construction activities will be short-term and will comply with DOH noise regulations (HAR, Chapter 11-46, Community Noise Control). When construction noise exceeds, or is expected to exceed the DOH's allowable limits, a permit must be obtained from the DOH.

Alternatives

The applicant has not proposed any alternatives to the proposed action other than no action- the Camp would continue to operate as a Boy Scout activity center and facilities would continue to decline and sanitation and safety may become prevalent issues. Recreational facilities would continue. Porta-potties use will continue and the Camp will continue to run down and eventually the Boy Scouts would no longer be able to adequately provide quality scouting opportunities.

SUMMARY OF COMMENTS

The application was referred to the following agencies for their review and comment: the **Federal**: Department of the Interior's Fish and Wildlife Service; the **State**: Department of Health; Office of Hawaiian Affairs; Office of Environmental Quality Control; Department of Land and Natural Resources Divisions of: Conservation and Resource Enforcement, Engineering, Forestry and Wildlife, Oahu District Land Office, Historic

Preservation; Parks and the **City & County of Honolulu:** Department of Planning, the Fire Department, the Board of Water Supply and the North Shore Neighborhood Board. In addition, this application was also sent to the nearest public library, the Waialua Public Library, to make this information readily available to those who may wish to review it.

Responses were received and have been summarized from the following agencies:

FEDERAL

DEPARTMENT OF THE INTERIOR

Fish and Wildlife Services

There is no federally designated or proposed critical habitat in the vicinity of the proposed project. Our records indicate the federally endangered Hawaiian hoary bat may be in the vicinity. The protected wedge-tailed shearwater may fly over the project area when traversing between the ocean and coastal breeding colonies. There may be native stream fauna and native plants in the project area. We recommend to the extent practical the impacts to all native habitats be avoided and/or minimized.

We offer the following recommendations to minimize or avoid impacts to native species and their habitats:

Hawaiian Hoary Bat-Woody plants greater than 15-feet tall should not be disturbed, removed, or trimmed during the bat birthing and pup rearing season (June 1 through September 15). Site clearing should be timed to avoid disturbance to the bats in the project area. Additional threats to the Hawaiian hoary bat include habitat destruction (elimination of roosting sites), direct and indirect effects of pesticides, disease, and entanglement on barbed wire fences.

Seabirds-Seabirds fly at night and are attracted to artificially-lighted areas resulting in disorientation and fallout due to exhaustion. They are also susceptible to collisions with objects that protrude above the vegetation layer, such as utility lines, guy-wires, and communication towers. Peak fallout period is September 15 through December 15.

Construction activities should only occur during daylight hours. Lighting should be kept to a minimum. Lights should be positioned low to the ground, be motion-triggered, and be shielded and/or full cut-off. Effective light shields should be completely opaque, sufficiently large, and positioned so that the bulb is only visible from below.

Because there are aquatic fish and wildlife resources within the proposed project vicinity or nearby, we have attached the Services recommended Best Management Practices regarding sedimentation and erosion in aquatic environments. (Exhibit 8)

Regarding the rifle range area we recommend the grounds of the rifle range area and nearby streams be regularly monitored for lead and other contaminants. Optimally the range should begin establishing the use of "green ammo" [unleaded bullets] only to protect from long term deposition of environmentally harmful metals. We recommend using native plants for landscaping purposes or species that have a low risk of becoming invasive.

Should it be determined that the proposed project may affect federally listed species, we recommend our Office be contacted early on in the planning process so that we may assist you with the Endangered Species Act compliance.

Applicant's Response

To avoid potential impacts to the Hawaiian hoary bat and migratory birds, we will follow your guidelines. To minimize soil erosion and sedimentation, construction activities will comply with the recommended best management practices.

Regarding the rifle range, the upgrades will use a system of bullet traps to trap the majority of fired bullets so that lead can be collected and disposed of properly. The Boy Scouts will also consider the use of "green ammo" to provide further protection from the disposition of environmentally harmful metals.

Use of native plants or non-invasive plant species will be considered for any landscaping improvements.

No federally listed species are expected to be affected by the Camp Pupukea Master Plan.

STATE OF HAWAI'I

DEPARTMENT OF HEALTH

Environmental Planning Office No comment

DEPARTMENT OF DEFENSE

We strongly recommend 1 omni-directional 121 db(c) siren be installed for coverage of the proposed development. Alternatively, if a hard wired internet connection exists, a Federal Signal internet based "Informer Unit" that will provide notification of emergency similar to a small warning siren. State Civil Defense will work with the Boy Scouts on placement of either of these warning devices.

Applicant's Response

The Boy Scouts will install a Federal Signal Internet-based "Informer Unit" that will provide notification of emergencies to Camp Pūpūkea. The Boy Scouts will coordinate with the State Civil defense regarding the purchase and installation of this device.

DEPARTMENT OF LAND AND NATURAL RESOURCES

Engineering

We confirm the project site, according to the Flood Insurance Rate Map (FIRM) is located in Zone D, an area where flood hazards are undetermined.

Applicant's Response

We acknowledge that the site is located within Flood Zone D, or an area where flood hazards are undetermined, but flooding is possible.

Forestry and Wildlife No comments

State Parks

According to the Environmental Assessment, the Boy Scouts intend to acquire the government road that bisects their property. Please note that the road provides vehicular access to the Pupūkea-Paumalū Reserve and while the DLNR is willing to continue discussions regarding its disposition, we are not inclined to relinquish control of the road without a viable alternate access having been identified and secured.

Any improvements with the road need to be coordinated with the Department.

Applicant's Response

The remnant State parcel of an unimproved road is not the vehicular access road commonly used to access the State Park Reserve. Access to the Reserve is generally gained via the main camp road through the Camp. The main camp road extends from Pūpūkea Road to the boundary of the Camp/State Park Reserve where there is a gate. The road continues into the Reserve from the gate.

The Boy Scouts appreciate the Departments willingness to continue discussions regarding the disposition of the remnant State parcel. As part of the proposal to acquire the remnant State parcel, an easement may be created over the main camp road to provide permanent access to the State Park Reserve. Other access ways such as hiking trails through Camp Pūpūkea to the Reserve may also be created.

The Boy Scouts are confident that an equitable solution can be found to maintain safe vehicular access to the Park Reserve and will collaborate with the Department to ensure that vehicular access to the Reserve is secured prior to any transfer of the State-owned parcel.

OFFICE OF HAWAIIAN AFFAIRS (OHA)

OHA has neither reservations to Camp Pūpūkea's master plan, nor its individual phases. We do, however, express caution when moving forward with the master plan towards the safeguard of 'ope'ape'a's habitat and a site that does not appear to be from military settlement.

We appreciate Aloha Council Boy Scouts of America's efforts to reassure that 'ope'ape'a's habitat, trees 15-feet or higher, will not be disturbed during the renovation process and the thorough flora and fauna assessment of the impacted area. OHA also acknowledges the Pūpūkea-Reserve is a critical habitat for hāhā and nīoi, endangered native plants.

There is a concern regarding the Archaeological Inventory Survey (AIS). The consultant has attributed all archaeological sites to the US Army Fleet Defense. A site does not

appear to be from a military installation. The features show aggregation of basalt rocks, contrary to all other sites that have clear cement structure delineations. If the site is to be disturbed we ask that additional testing be done as the site is very distinct from all other cement structures present in the area.

We request assurances that should Iwi Kūpuna or native Hawaiian cultural deposits are identified during any ground altering activities, all work will immediately cease in the vicinity and the appropriate agencies including OHA will be contacted pursuant to applicable law.

Applicant's response

Regarding your concern of the AIS, According to Scientific Consulting Services that completed the AIS, the definitive characteristic of the feature being interpreted as historic rather than pre-contact is that the features were constructed of limestone that is not native to the area and imported to the site. The shovel probe in question yielded crushed coral strata which is also an imported fill material.

Further during the World War II era, the US military did not typically utilize or preserve traditional sites or features. The features have been interpreted as non-traditional structures associated with the US military and no additional testing is warranted. The Historic Preservation Division is currently reviewing the AIS.

Should Iwi Kupuna or native Hawaiian cultural deposits be identified during any other ground altering activities, the Contractor will stop work in the vicinity and immediately contact OHA and the Historic Preservation Division.

CITY AND COUNTY OF HONOLULU

Board of Water Supply

The parcels are located above the 792-ft service limit elevation of the water system serving this area. The building permits for additional facilities cannot be approved until a new water system is constructed in accordance with BWS standards and dedicated to the BWS. The improvements include booster pumps, transmission mains and a reservoir. A water master plan should be submitted for our approval. Improvements to the onsite water system do not meet the requirements of our water service limit rules. The final Environmental assessment should address the offsite water system improvements necessary to meet the service limit requirements.

Applicant's Response

The intent of the Master Plan improvements are not focused on increasing camp capacity, rather they are necessary to provide much needed infrastructure improvements (Wastewater) and adequate Camp facilities for training and leadership programs. Plans for Phase I will retain the existing maximum capacity of campers and staff at 385 individuals. Phase II and Phase III improvements are expected to be built our over the next 20-years dependent upon funding and potentially increase the number of campers and staff by 100 to a total of 485 individuals.

According to your information, because the Camp is located above the 792-foot service limit, building permits for additional facilities cannot be approved until a new water

system is constructed in accordance with BWS standards. A water system that complies with BWS standards may include booster pumps, transmission mains, and a 100,000 + gallon reservoir to service the Camp is not financially possible.

At a former meeting, it was our understanding that BWS's concern is an increase in structures and/or intensity of use above the BWS service limit. To that end, several existing structures would be demolished and replaced with new structures particularly those associated with Phase I and II resulting in no net increase in structures.

If it can be determined that there is not an increase in intensity and that new buildings are considered replacement structures, it may be possible that the significant water system improvements may not be necessary. We have prepared an inventory of existing buildings and buildings per phase to be demolished and added. Within Phase I and Phase II because several buildings will be demolished there will be a net <u>decrease</u> in buildings. **(Exhibit 9)**

The Master Plan proposed incremental improvements to the Camp over a 20-year period. A primary driver of the Phase I improvements is the wastewater system upgrades including new comfort stations connected to individual wastewater systems in compliance with EPA regulations. Other Phase I improvements will be implemented over time as funding becomes available. Phase II improvements are mid-range in timing and are also greatly dependent on the availability of funding. It is only with Phase III improvements that there will be a return to the total number of buildings existing at the camp. The long-range Phase III improvements also greatly dependent on funding, are projected toward the end of the 20-year time frame and are not critical to the day-to-day operations.

Camp Pūpūkea has been in operation for over 50-years and it is important to the Boy Scouts to maintain the existing rustic, wilderness nature of the camp. The existing camp water storage system adequately serves the camp's needs, however some transmission lines are in need of replacement.

We will coordinate with the Service Engineering Section of the BWS to come to agreement regarding which buildings may be considered replacement structures and the net number of buildings per phase.

Regarding Phase III improvements-since these are not immediate needs and not critical to the day-to-day operations of the camp-we would like your consideration that water system improvements related to Phase III could be looked at as the need for these facilities arises and funding becomes available. In planning the implementation of elements of Phase III, the Boy Scouts acknowledge that adequate water systems improvements in accordance with BWS standards may be required and the water system improvements will be factors in the Boy Scouts ability to move forward with elements in Phase III.

Environmental Services

There are no plans for a future wastewater treatment plant in the Pūpūkea area. Please continue to coordinate with the State Department of Health, Clean Water Branch

regarding on-site wastewater systems upgrades to accommodate the wastewater from the proposed project.

Applicant's response

Thank you for confirming that there is no City wastewater system service in the project area.

The latrines and large capacity cesspools have been closed and authorization to install 20 individual wastewater systems has been approved by the Department of Health (DoH). We will continue to work with the DoH and the EPA as necessary regarding on-site wastewater system upgrades.

Facility Maintenance

We are concerned with the current pavement design of Pūpūkea road which would not be adequate for the increased vehicle traffic volume and traffic load.

During the construction and upon completion of the project, any damages/deficiencies to any City maintained roadway right-of-ways, shall be corrected to City Standards and accepted by the City.

Applicant's response

A significant increase in traffic to and from Camp Pūpūkea is not expected due to the master plan improvements. A traffic impact analysis report prepared does not project a significant increase in traffic. Traffic volumes associated with the Camp include: 1) Campers and staff who are dropped off or participate in rideshare (bus, van or carpool); and 2) staff who drive themselves and leave their car at camp overnight. Nearly all camp users arrive through rideshare.

Phase I and II improvements retain the existing maximum capacity of campers and staff at 385. Phase III may increase capacity to 485 that equates to an additional 25 vehicles to the camp at peak times when all improvements are completed compared to exiting conditions.

While it is not anticipated during construction and upon completion of the improvements, the Boy Scouts and/or its contractors will correct any damages to any City maintained road rights-of-way caused by the improvements to Camp Pūpūkea. It is not practical or reasonable for the Boy Scouts and/or its contractors to be responsible for addressing any current deficiencies to ay City maintained road right-of-ways.

Fire Department

The Honolulu Fire Department (HFD) requires the National Fire Protections Association [NFPA] Uniform Fire Code be complied with in regards to access to structures and building entrances, unobstructed width and vertical clearance for fire apparatus roads; and water supply approved by the county for fire flow and location of water supply [fire hydrants].

HFD is requesting that civil drawings be submitted for review and approval in addition to a letter requesting consideration for approval of five different issues that was previously discussed in a meeting with the consultant.

Applicant's response

The Boy Scouts, their Architect and Civil Engineer met with the HFD on two occasions to understand the Fire Code requirements. Meeting minutes have been forwarded to the Department. It is the Boy Scouts understanding that these 5 points were agreed upon:

- A fire access road 16-ft wide with a turnaround at the end located within 150-feet from the last shower/comfort statin will be provided. The surface of the fire lane must be able to support the weight of an 83,000-pound fire truck;
- All family/residential buildings will require protection with a fire sprinkler system or a fire hydrant system. If fire hydrants are installed, fire flow requirements specified by the Board of Water Supply must be met. If a fire sprinkler system is installed, the distance requirements for fire protection coverage can be extended by a factor of 3;
- For the Junior staff lodging and family cabins complex, it is recommended that a fire sprinkler system meeting code requirements be connected to the swimming pool pump system;
- The Phase I shower/restroom buildings will be granted variances from the fire sprinkler/fire hydrant requirements but must be readily accessible from the 16-foot wide fire lane.
- Open sided pavilions and structures 400-ft² or less will not require fire sprinkler/fire hydrant protection.

Additional Fire Department comments dated October 29, 2014

The Honolulu Fire Department approves the five referenced points stated in your correspondence as equivalent to the required fire department access and water supply requirements. This approval is contingent upon the following conditions being complied with:

- 1. A letter from a structural engineer certifying that the existing access road will support the weight of HFD's fire apparatuses is obtained.
- 2. Approved automatic fire sprinkler systems are designed and installed in accordance with NFPA 1, Uniform Fire Code, 2006 Edition, Chapter 13 and NFPA 13R.
- 3. A water supply approved by the county capable of supplying the required fire flow for fire protection is provided.
- 4. Civil drawings must be submitted to the HFD for review and approval.

Department of Planning and Permitting

We offer the following comments:

1. Additional details should be provided for the rifle range and where it is being relocated to (i.e. types of rifles being fired, hours of operation, safety measures from overfire, and noise impacts).

- 2. More information with respect to anticipated number of people using the facility and the impact of vehicles discharging petroleum products onto the parking areas. What methods will be used to contain the contaminants?
- 3. What is the current purpose of the intervening parcel to be acquired? Will access be interrupted due to the acquisition? What process will be utilized to provide opportunities for the affected parties to provide input on the proposed acquisition?
- 4. All outdoor lighting should be down shielded to have an intensity no greater than the minimum necessary for public safety to maintain the preservation character of the neighborhood and all lights should be fully shielded.
- 5. More details should be provided on the closure of the cesspools relating to how the final closure plan will prevent future contamination of ground water resources. The Environmental Protection Agency required closure of the cesspools in 2005, but it took 7-years just to cap them. Why did it take so long and what is the projected timeframe to completely close the cesspools so that future ground water contamination is prevented?
- 6. A grading permit may be required.
- 7. An assessment of the expected traffic generated from construction activities should be conducted and submitted to the DPP in order to determine whether a Construction Management Plan is necessary to mitigate impacts on the affected streets and community;
- 8. A Traffic Management Plan (TMP) should be prepared and submitted to the DPP prior to the opening of each major facility that is a new addition to the camp over the specified build-out period. The TMP should include analysis of existing traffic demand, management strategies being utilized (e.g. ride sharing) and their relative effectiveness. The traffic volumes and base assumptions in the Traffic Impact Assessment, dated April 25, 2013 could be used as the basis for updating the TMP.

Applicant's response

- 1. **Staff notes:** Additional details regarding the rifle range has been included in the Proposed Use section of this report.
- 2. A significant increase in the number of people using Camp Pūpūkea is not expected as a result of the improvements. Phase I improvements proposes the addition of 40 parking stalls. Phase III improvements include the addition of 104 parking stalls. The parking areas will be designed in conformance will all requirements regarding drainage, including requirements regarding containment of contaminants.
- 3. The remnant State parcel is a portion of an unimproved road leading to the Pūpūkea-Paumalū Reserve. However, this road does not provide safe vehicular access and is generally not used to access the State Park Reserve. The main camp

road is more commonly utilized to gain access to the Reserve. The Boy Scouts are in discussion with the Department regarding the proposed acquisition. The Boy Scouts are proposing as part of the acquisition of the remnant State parcel, an easement be created over the main cam road to provide permanent access to the Pūpūkea-Paumalū State Park Reserve.

The Boy Scouts are confident that an equitable solution can be found to maintain safe vehicular access to the Pūpūkea-Paumalū State Park Reserve and will collaborate with the DLNR to ensure that vehicular access to the Reserve is secured prior to any proposed transfer of the State owned parcel.

- 4. We concur with your recommendations regarding lighting.
- 5. The Boy Scouts are in compliance with all U.S. EPA regulations. A Cesspool Closure and Backfilling Report has been included with the final Environmental Assessment. Phase I improvements include replacement facilities. The Boy Scouts have been authorized to install 20 septic tanks by the Department of Health.
- 6. We acknowledge a grading permit may be required.
- 7. The proposed improvements are incremental over 20-years. Large scale construction projects are not anticipated in a concentrated period of time. For projects where construction traffic is expected, contractors will be required to provide a construction management plans.
- 8. The Traffic Impact Assessment did not project a significant increase in traffic to and from the camp with the proposed Master Plan improvements. The majority of Camp users arrive through rideshare. The majority of campers are too young to drive.

GENERAL PUBLIC

Although we support the Boy Scouts efforts to improve their facility and their service to the Pacific scouting community, it is imperative that the State retains an access road to the State Pūpūkea-Paumalū Park Reserve through the Boy Scout property for public safety, fire and rescue vehicles and for periodic maintenance and monitoring of the Reserve.

Reasonable vehicular access to the Pūpūkea-Paumalū Park Reserve while maintaining the camp atmosphere for the Scouts needs to be agreed upon. We encourage the Boy Scouts, their consultant, PBR and State Parks to come up with a solution that will serve everyone's needs.

NORTH SHORE COMMUNITY LAND TRUST

For the past 15 years, NSCLT has focused much of its efforts on the protection and community stewardship of the Pūpūkea-Paumalū State Park Reserve, a 1100-acre coastal bluff and park reserve that borders the Boy Scouts of America's Camp Pūpūkea. The proximity of the State Park Reserve and the Camp to one another present many

opportunities for fun and exciting partnerships between the Scouts, State Parks, NSCLT and the community to care for and enjoy both of these amazing resources.

NSCLT is excited to learn that the Boy Scouts are moving forward with much needed improvements to Camp Pūpūkea and would like to express our willingness to help organize volunteer support. We request that the Boy Scouts and State Parks/DLNR work with each other to ensure that perpetual vehicular access for safety and emergency purposes is secured prior to any transfer of the State-owned road described as the "remnant parcel." Safe vehicular access for emergency rescue response and park stewardship activities is essential to the health and safety of both the community members and scouts who hike and explore within the Reserve.

Applicant's response

The Boy Scouts will continue discussions with State Parks/DLNR to provide safe vehicular access to the Park Reserve.

ANALYSIS

After reviewing the application, by correspondence dated June 10, 2014, the Department has found that:

- 1. The proposed improvements to the existing site is an identified land use pursuant to the Hawai'i Administrative Rules, §13-5-22 Structures and Land Use, Existing (D-1) Major alteration of existing structures, facilities, use, and equipment, or topographical features which are different from the original use. Please be advised, however, that this finding does not constitute approval of the proposal;
- 2. Pursuant to HAR, §13-5-40 (4) a Public Hearing shall not be required;
- 3. In conformance with Chapter 343, Hawai'i Revised Statutes (HRS), as amended, and Chapter 11-200, HAR, a finding of no significant impact to the environment (FONSI) is anticipated for the proposed project;
- 4. The proposed project is not within the Special Management Area.

In addition, a FONSI to the environment was published in the October 23, 2014 Environmental Notice.

CONSERVATION CRITERIA

The following discussion evaluates the merits of the proposed land use by applying the criteria established in §13-5-30, HAR.

1. The proposed land use is consistent with the purpose of the Conservation District.

The objective of the Conservation District is to conserve, protect and preserve the important natural resources of the State through appropriate management and use to promote their long-term sustainability and the public health, safety, and welfare.

The upgrades to Camp Pūpūkea will not have a significant adverse impact on Conservation District resources such as watersheds and water resources, scenic or historic areas, park, wilderness or beach reserves, indigenous or endemic plants, fish, and wildlife.

No threatened or endangered plant species listed, or proposed for listing, under either the Federal or State of Hawai'i endangered species programs were found during the course of a botanical survey of the camp property.

The 'ōpe'ape'a, or Hawaiian hoary bats are present in the vicinity and is listed as an endangered species under the Federal and State of Hawai'i endangered species statutes. The Boy Scouts will follow and implement federal guidelines to protect the 'ōpe'ape'a. No other threatened or endangered mammal, bird, or insect species listed or proposed for listing, under either the Federal or State of Hawai'i endangered species programs were found.

The proposed improvements are to promote the long-term sustainability of Camp Pūpūkea by upgrading existing facilities and activities. Improvements will contribute to the public health, safety and welfare of the users of the Camp. The wastewater improvements will replace the former large capacity cesspools; the roadway will be improved to allow Fire Department access and sprinkler system improvements are proposed for the family camp area.

2. The proposed land use is consistent with the objectives of the subzone of the land on which the use will occur.

The objective of the General subzone is to designate open space where specific conservation uses may not be defined, but where urban use would be premature. The objective of the Resource subzone is to develop, with the proper management, areas to ensure sustained use of the natural resources of those areas.

The Camp <u>Pupukea</u> site is primarily open space surrounded by natural vegetation. The facility upgrades would allow the Boy Scouts to better operate and manage the wilderness camp while maintaining the open space conditions. The proposed improvements will help the Boy Scouts to better manage the wilderness camp and sustained uses of the natural resources in the area.

3. The proposed land use complies with provisions and guidelines contained in Chapter 205, HRS, entitled "Coastal Zone Management," where applicable.

Staff believes the proposed project complies with provisions and guidelines contained in Chapter 205, HRS regarding Coastal Zone Management in regards to protecting and preserving scenic and open space resources and protecting marine resources by utilizing best management practices to prevent storm water discharges, not significantly increasing the amount of impervious surfaces, maintaining current drainage patterns and utilizing vegetation to limit erosion.

4. The proposed land use will not cause substantial adverse impacts to existing natural resources within the surrounding area, community, or region.

5.

6.

Camp Pūpūkea is an existing facility that has been in operation for over 50 years. The proposed upgrades of several of the camp's systems and facilities will not substantially change its footprint or the activities that currently take place on the site. Therefore, upgrades to Camp Pūpūkea are not anticipated to cause adverse impact to existing natural resources within the surrounding area, community, or region.

The proposed land use, including buildings, structures and facilities, shall be compatible with the locality and surrounding area, appropriate to the physical conditions and capabilities of the specific parcel or parcels.

The upgrades to Camp Pūpūkea will be compatible with the surrounding areas and appropriate to the physical conditions and capabilities of the site. Many of the improvements will involve replacing outdated infrastructure and facilities, which will improve the operation and sustainability of Camp Pūpūkea. In addition, the upgrades will not significantly detract from the existing open space characteristics of the site.

The existing physical and environmental aspect of the land, such as natural beauty and open space characteristics, will be preserved or improved upon, which ever is applicable.

The camp site is surrounded by tall trees and thick vegetation, which prevents any views of the coast below and prevents views of the camp from either Kamehameha Highway or Waimea Bay. Staff believes the upgrades will not impact any existing visual resources. Clearing and grading will be kept to a minimum, so the facility upgrades will not have a significant negative impact on the natural beauty and open space characteristics of the Camp. Further the Boy Scouts would like to maintain the rustic aesthetics of the existing operational camp.

7. Subdivision of the land will not be utilized to increase the intensity of land uses in the Conservation District.

No subdivision of land is proposed for this project.

8. The proposed land use will not be materially detrimental to the public health, safety and welfare.

Staff believes the proposed land use will not be materially detrimental to the public health, safety and welfare as mitigated. The facility upgrades for Camp Püpükea will be beneficial and will improve public health, safety, and welfare.

CULTURAL IMPACT ANALYSIS

Regarding the cultural resources of the Conservation District, an archaeological inventory survey of Camp Pūpūkea did not reveal any Hawaiian cultural artifacts or human remains. All archaeological sites within Camp Pūpūkea are associated with the U.S. military use of the property between 1927 and 1953. The archaeological inventory survey concludes that: 1) further evaluation of the property is unlikely to yield any

18

archaeological information that would be considered historically significant; 2) preservation of existing military-related archaeological sites is not necessary; and 3) no further archaeological work is necessary at the site.

According to the Cultural Impact Assessment for the project, it appears the property has not been used for traditional cultural purposes within recent times. Attempted consultation with individuals such as community members, the State Historic Preservation and State Parks Division, Office of Hawaiian Affairs, Cultural Practitioners and the Wailua Civic Club has not yielded any response. It is believed that the project will not impair, diminish, or preclude customary or traditional native Hawaiian rights and no action is necessary to protect these rights.

No comments were received by the Historic Preservation Division regarding the CDUA.

DISCUSSION

Camp Pūpūkea is an established Wilderness Camp in a non-conforming setting. With the improvements, it is important to the Boy Scouts to maintain the existing rustic, wilderness nature of the camp. To that end several buildings will be eliminated with functions consolidated in a lesser number of new buildings. Overall, Phases I and II master plan improvements will result in a decrease in the number of structures. It is only with Phase III improvements that density and capacity of the facility may increase. **Exhibit 9** shows existing buildings and buildings per phase to be demolished and replaced or added.

According to the applicant, the proposed Master Plan improvements beyond Phase I are conceptual in nature and dependent on funding. The immediate needs in Phase I are focused on infrastructure improvements and adequate facilities. Proposed work in Phase I and II consist of repair, replacement and "upgrades" to existing land uses. The capacity and density of the facility is not projected to change within these two phases.

While staff understands the Master Plan is a long range plan, significant improvements are required before the Camp's capacity can be increased. The Boy Scouts have recognized that the Phase III improvements are not critical to the day-to-day operations of the Camp at this time. And adequate water systems improvements in accordance with BWS standards will be factors in the Boy Scouts ability to move forward with the elements in Phase III.

Staff has consulted with the Board of Water Supply and was told no building permits will be signed for any type of improvements until the water system is to current standards. While no City Ordinance could be provided regarding this statement, staff was told this was due to guidelines regarding adequate flow, water pressure and fire protection guidelines.

Other concerns that were brought up in the processing of this application were access to the Pūpūkea-Paumalū Forest Reserve and the proposed acquisition of the State's remnant road parcel. The Boy Scouts are proposing as part of the acquisition of the remnant State parcel, an easement be created over the main camp road to provide permanent access to the Pūpūkea-Paumalū State Park Reserve. Discussions continue between the Department and the Boy Scouts and that matter is not part of this submittal.

The Fire Department also had concerns regarding Fire Code compliance. However it is staff's understanding that matters were worked out in two meetings between the Boy Scout's Architect and HFD. The Boy Scouts continue to correspond with HFD to address concerns and insure Camp facilities improvements include HFD accessibility, firefighting apparatus in place or readily available.

Staff also notes that landscaping is slightly discussed in the application but no landscaping plans or a plant list has been included. Staff notes plantings shall be appropriate to the site location and preference to plant materials that are endemic or indigenous to Hawaii shall be given. The introduction of invasive plant species is prohibited.

Staff notes during construction, Standard Best Management Practices will be observed. Within the Environmental Assessment, the applicant has identified a number of mitigative measures, conditions and practices to ensure that the proposal will have minimal effects on the natural resources of the land. As such these proposed measures, conditions and practices are incorporated into the permit.

Staff believes that the project will have negligible adverse environmental or ecological effects provided that best management practices and mitigation measures as described in the application and environmental assessment, and as required by rule or laws, are fully implemented.

While Staff notes the City has concerns regarding the proposed improvements, mainly potable water supply, Staff also notes, the Hawaii Revised Statutes, §183C-5 and the Hawaii Administrative Rules, §13-5-7 cannot prohibit the continuance, or repair and maintenance of nonconforming land uses and structures.

As Camp Pūpūkea is operational and not a new use and the majority of proposed improvements may be considered repair, maintenance and replacement of existing nonconforming facilities, Staff has no objections to improvements that shall not increase capacity or density of the site and recommends that Phase I and Phase II of the Boy Scouts Camp Pūpūkea Master Plan be approved.

The Boy Scouts must continue to work diligently with the Board of Water Supply, the Fire Department and the Department of Planning and Permitting to work out details on any remaining concerns the City Departments may have.

RECOMMENDATION

Based on the preceding analysis, staff recommends that the Board of Land and Natural Resources APPROVE Conservation District Use Application OA-3718 for **Phase I and Phase II** of the Camp Pūpūkea Master Plan located at 59-780 Pūpūkea Road, Haleiwa, Koʻolau Loa, Oʻahu, upon TMKs: (1) 5-9-005:002 & 077 and a State road remnant parcel subject to the following conditions:

1. The permittee shall comply with all applicable statutes, ordinances, rules, and regulations of the federal, state, and county governments, and applicable parts of this chapter;

- 2. The permittee, its successors and assigns, shall indemnify and hold the State of Hawaii harmless from and against any loss, liability, claim, or demand for property damage, personal injury, and death arising out of any act or omission of the applicant, its successors, assigns, officers, employees, contractors, and agents under this permit or relating to or connected with the granting of this permit;
- 3. The permittee shall comply with all applicable department of health administrative rules;
- 4. The permittee shall provide documentation (e.g., book and page or document number) that the permit approval has been placed in recordable form as a part of the deed instrument, prior to submission for approval of subsequent construction plans;
- 5. Before proceeding with any work authorized by the department or the board, the permittee shall submit four copies of the construction plans and specifications to the chairperson or an authorized representative for approval for consistency with the conditions of the permit and the declarations set forth in the permit application. Three of the copies will be returned to the permittee. Plan approval by the chairperson does not constitute approval required from other agencies;
- 6. Unless otherwise authorized, any work or construction to be done on the land shall be initiated within one year of the approval of such use, in accordance with construction plans that have been signed by the chairperson, and shall be completed within 15 years of the approval of such use. The permittee shall notify the department in writing when construction activity is initiated and when it is completed;
- 7. All representations relative to mitigation set forth in the accepted application and environmental assessment or impact statement for the proposed use are incorporated as conditions of the permit;
- 8. The applicant shall plan to minimize the amount of dust generating materials and activities. Material transfer points and on-site vehicular traffic routes shall be centralized. Dusty equipment shall be located in areas of least impact. Dust control measures shall be provided during weekends, after hours and prior to daily start-up of project activities. Dust from debris being hauled away from the project site shall be controlled. Landscaping and dust control of cleared areas will be initiated promptly;
- 9. Should historic remains such as artifacts, burials or concentration of charcoal be encountered during construction activities, work shall cease immediately in the vicinity of the find, and the find shall be protected from further damage. The contractor shall immediately contact SHPD (692-8015), which will assess the significance of the find and recommend an appropriate mitigation measure, if necessary;
- 10. The permittee shall utilize Best Management Practices for the proposed project;

- 11. The permittee shall observe the U.S. Fish and Wildlife Service Recommended Standard Best Management Practices noted as **Exhibit 8**;
- 12. No woody plants greater than 15-feet tall shall be disturbed, removed, or trimmed during June 1 through September 15;
- 13. The permittee shall submit a landscaping plant that shall include a list of flora to be planted;
- 14. During construction, appropriate mitigation measures shall be implemented to minimize impacts to the aquatic environment, off-site roadways, utilities, and public facilities;
- 15. The permittee understands and agrees that the permit does not convey any vested right(s) or exclusive privilege;
- 16. In issuing the permit, the department and board have relied on the information and data that the permittee has provided in connection with the permit application. If, subsequent to the issuance of the permit such information and data prove to be false, incomplete, or inaccurate, this permit may be modified, suspended, or revoked, in whole or in part, and the department may, in addition, institute appropriate legal proceedings;
- 17. When provided or required, potable water supply and sanitation facilities shall have the approval of the department of health and the county department of water supply;
- 18. Where any interference, nuisance, or harm may be caused, or hazard established by the use, the permittee shall be required to take measures to minimize or eliminate the interference, nuisance, harm, or hazard;
- 19. Obstruction of public roads, trails, lateral shoreline access, and pathways shall be avoided or minimized. If obstruction is unavoidable, the permittee shall provide alternative roads, trails, lateral beach access, or pathways acceptable to the department;
- 20. During construction, appropriate mitigation measures shall be implemented to minimize impacts to off-site roadways, utilities, and public facilities;
- 21. The permittee shall obtain a county building or grading permit or both for the use prior to final construction plan approval by the department;
- 22. All exterior lighting shall be shielded to protect the night sky;
- 23. The permittee acknowledges that the approved work shall not hamper, impede, or otherwise limit the exercise of traditional, customary, or religious practices of native Hawaiians in the immediate area, to the extent the practices are provided for by the Constitution of the State of Hawaii, and by Hawaii statutory and case law;

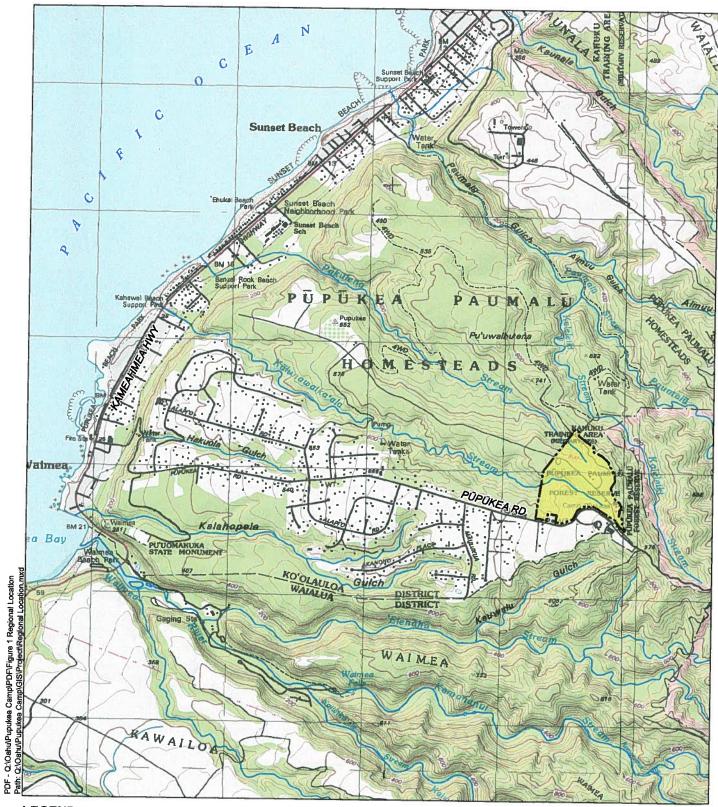
- 24. The permittee understands that if an appeal to the Environmental Assessment (FEA) is filed within the thirty (30) day appeal period for the FEA, the Board's approval is temporarily stayed until the end of the appeal;
- 25. Failure to comply with any of these conditions shall render this Conservation District Use Permit void under Chapter 13-5, as determined by the chairperson or board.

Respectfully submitted,

K. Tiger Mills, Staff Planner Office of Conservation and Coastal Lands

Approved for submittal:

William J. Aila, H., Chairperson Board of Land and Natural Resources





Source: U.S. Geological Survey (2014); State Division of Aquatic Resources (2013) Discialmer: This Graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.

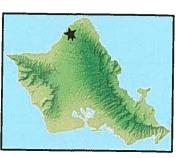
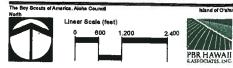
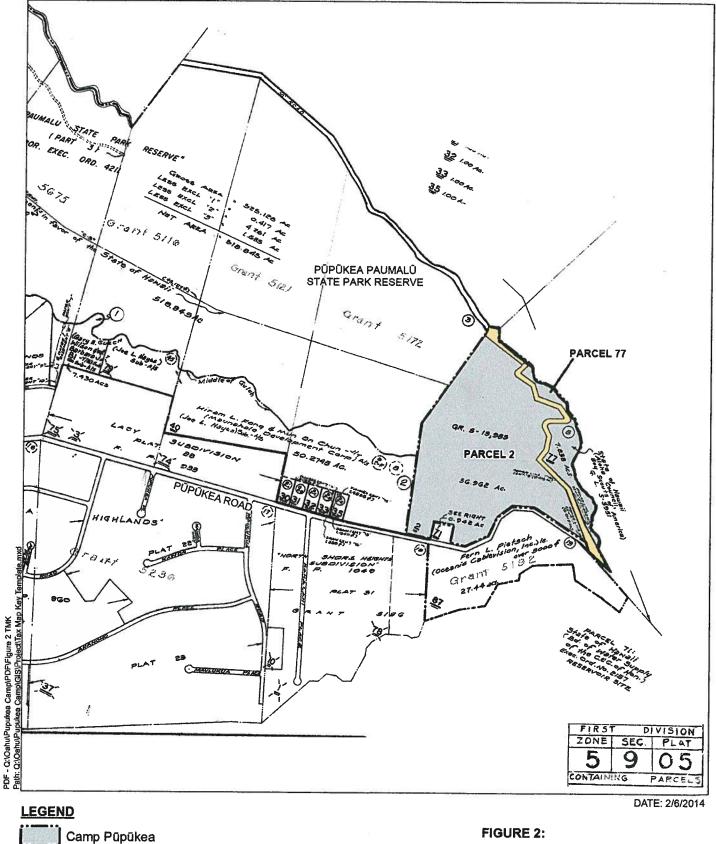


FIGURE 1: Regional Location

CAMP ΡŪΡŪΚΕΑ



DATE: 2/4/2014

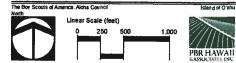


Remnant State Parcel



FIGURE 2: Tax Map Key

CAMP PŪPŪKEA



Source: City & County of Honolulu (2013) Disclaimer: This Graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.



Entry Gate (heft) and public trail access (right) to Pupūkea- Paumalū Forest Reserve.



Cesspool and leech field for camp Master and Director's Cabins.

5. Staff and visitor cabins adjacent to pool.





2. Two 3,000 gallon water storage tanks.



Harry

3. Ranger's Residence.

a

6

0

â 6





8. View of Weinberg Lodge from pool.



DATE PHOTOS TAKEN: April 17, 2014

EXHIBIT 3A



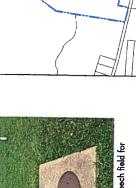
Site Photos

FIGURE 3A :









Sewer manhole and leech field for Weinberg Lodge.





11. Kilohana campgrounds.



12. Closed latrine and portable toilet at Kilohana.



































16. Aloha 'Āina camp grounds.

17. Access gate to Pūpūkea-Paumalū Forrest Reserve.



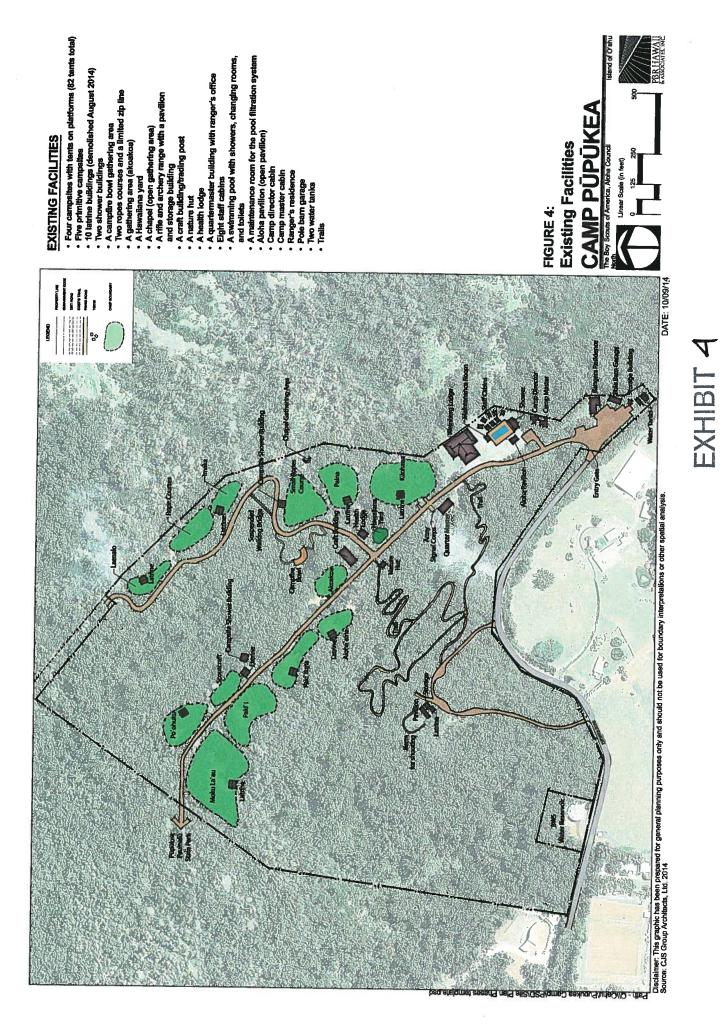


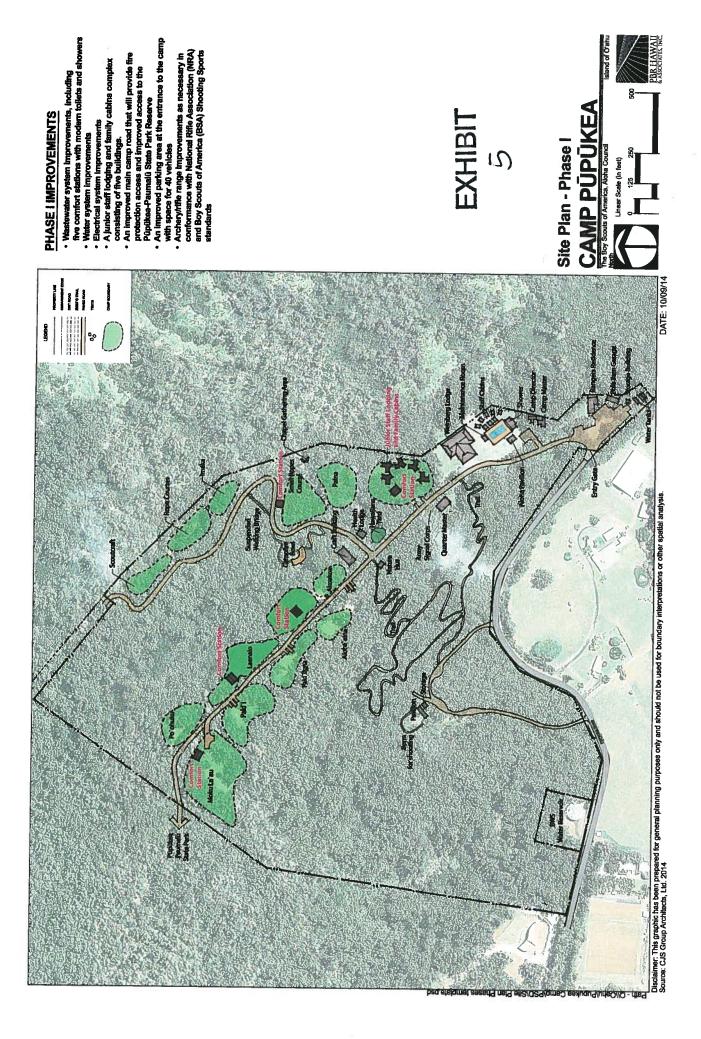
DATE PHOTOS TAKEN: April 17, 2014

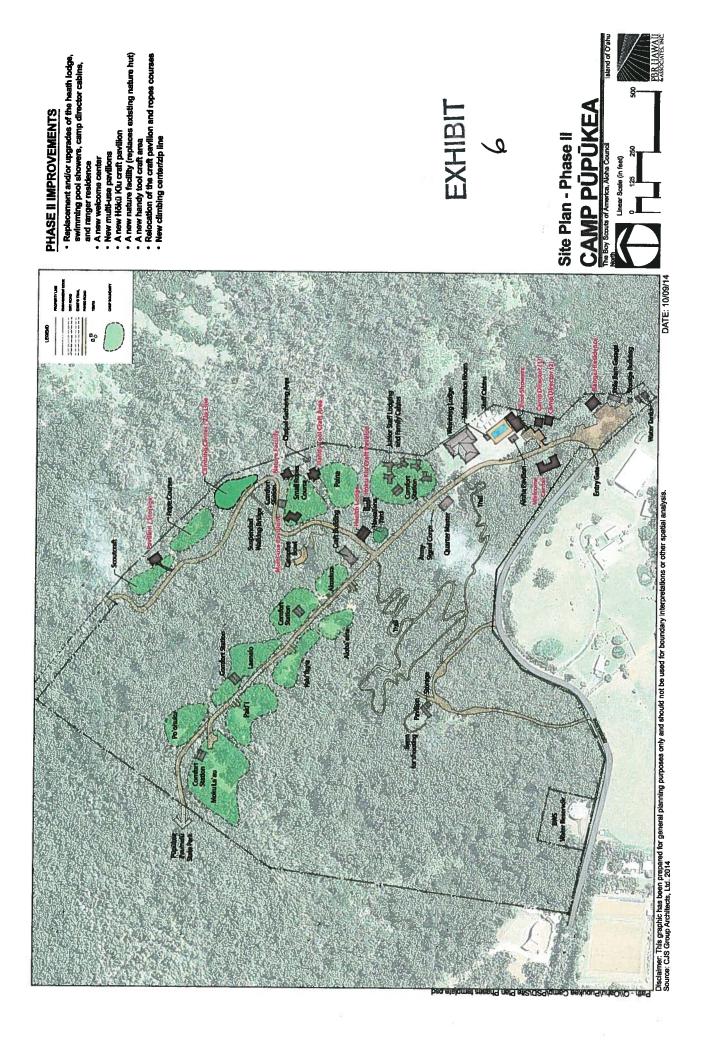
EXHIBIT 3B

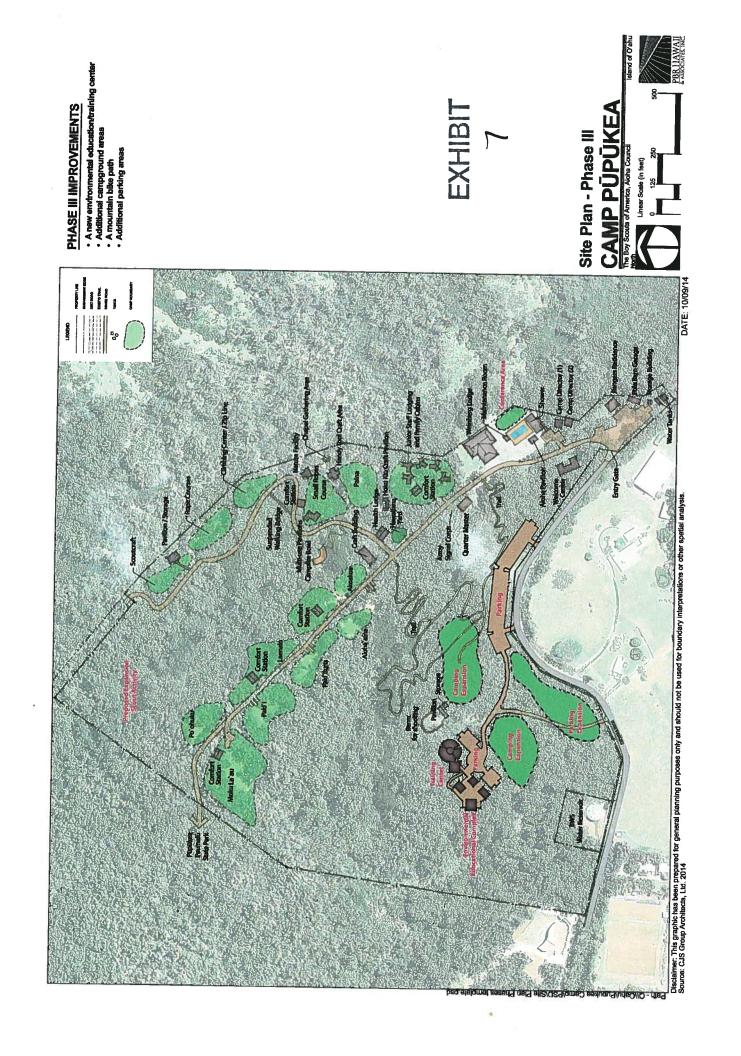
CAMP PUPUKEA

Site Photos FIGURE 3B :









U.S. Fish and Wildlife Service Recommended Standard Best Management Practices

The U.S. Fish and Wildlife Service (USFWS) recommends the following measures to be incorporated into project planning to avoid or minimize impacts to fish and wildlife resources. Best Management Practices (BMPs) include the incorporation of procedures or materials that may be used to reduce either direct or indirect negative impacts to aquatic habitats that result from project construction-related activities. These BMPs are recommended in addition to, and do not over-ride any terms, conditions, or other recommendations prepared by the USFWS, other federal, state or local agencies. If you have questions concerning these BMPs, please contact the USFWS Aquatic Ecosystems Conservation Program at 808-792-9400.

1. Authorized dredging and filling-related activities that may result in the temporary or permanent loss of aquatic habitats should be designed to avoid indirect, negative impacts to aquatic habitats beyond the planned project area.

2. Dredging/filling in the marine environment should be scheduled to avoid coral spawning and recruitment periods, and sea turtle nesting and hatching periods. Because these periods are variable throughout the Pacific islands, we recommend contacting the relevant local, state, or federal fish and wildlife resource agency for site specific guidance.

3. Turbidity and siltation from project-related work should be minimized and contained within the project area by silt containment devices and curtailing work during flooding or adverse tidal and weather conditions. BMPs should be maintained for the life of the construction period until turbidity and siltation within the project area is stabilized. All project construction-related debris and sediment containment devices should be removed and disposed of at an approved site.

4. All project construction-related materials and equipment (dredges, vessels, backhoes, silt curtains, etc.) to be placed in an aquatic environment should be inspected for pollutants including, but not limited to; marine fouling organisms, grease, oil, etc., and cleaned to remove pollutants prior to use. Project related activities should not result in any debris disposal, non-native species introductions, or attraction of non-native pests to the affected or adjacent aquatic or terrestrial habitats. Implementing both a litter-control plan and a Hazard Analysis and Critical Control Point plan (HACCP – see http://www.haccp-nrm.org/Wizard/default.asp) can help to prevent attraction and introduction of non-native species.

5. Project construction-related materials (fill, revetment rock, pipe, etc.) should not be stockpiled in, or in close proximity to aquatic habitats and should be protected from erosion (*e.g.*, with filter fabric, etc.), to prevent materials from being carried into waters by wind, rain, or high surf.

6. Fueling of project-related vehicles and equipment should take place away from the aquatic environment and a contingency plan to control petroleum products accidentally spilled during the project should be developed. The plan should be retained on site with the person responsible for compliance with the plan. Absorbent pads and containment booms should be stored on-site to facilitate the clean-up of accidental petroleum releases.

7. All deliberately exposed soil or under-layer materials used in the project near water should be protected from erosion and stabilized as soon as possible with geotextile, filter fabric or native or non-invasive vegetation matting, hydro-seeding, etc.



EXHIBIT 8

CAMP PÜPÜKEA MASTER PLAN FINAL ENVIRONMENTAL ASSESSMENT

Table 1: Camp Püpükea Net Buildings by Phase

EXISTING BUILDINGS	Number of Buildings			
	Existing	Phase I	Phase II	Phase II
Latrines	10	-10		
Campsite shower buildings	2	-2		
Rifle and archery range with a pavilion and storage buildin	2			
Craft Building/Trading Post	1			
Nature hut	1		-1	
Health lodge	1		-1	
Quartermaster building with ranger's office	1			
Staff cabins (near pool)	8		-8	
Swimming pool showers	1		-1	
Maintenance room for the pool filtration system	1			
Open pavilion (Aloha Pavilion)	1			
Camp Director cabin	1		-1	
Camp Master cabin	1		-1	
Weinberg Lodge	1			
Ranger's residence	1		-1	
Pole barn garage	1			
Storage building	a 1			
OTHER FACILITIES				
Campsites (4) with tents on platforms (82 tents total)	0			
Campfire bowi gathering area	0			
Challenging Outdoor Personal Experience courses (COPE)	0			
Gathering Place (akoakoa)	0			
Hawaiiana yard	0			
Swimming pool	0			
Chapel (open gathering area)	0			
TOTAL	35	-12	-14	

Existing	Phase I	Phase II	Phase III
St. Shite	5		A NEAL SOL
1315 in	5		Partician .
TOTAL NEW, PHASE I			i —
TOTAL REMOVED, PHASE I			
INCREASE/DECREASE, PHASE I			
IGS, PHASE I	33		
	EW, PHASE I /ED, PHASE I ASE, PHASE I	5 5 5 5 5 5 5 5 5 5 5 5 5 7 7 7 7 7 7 7	5 5 EW, PHASE I 10 /ED, PHASE I -12 ASE, PHASE I -2

THE REAL PROPERTY OF THE PROPERTY OF THE REAL PROPE				1	
PHASE II NEW BUILDINGS	Existing	Phase I	Phase II	Phase III	
Health lodge (replacement)	in the second	THE WAY	1	S PORNA (18	
Swimming pool showers (replacement)		And A	1	and the second	
Camp director cabins (replacement)	Description of	· TOMASOF	2	CAN THE REAL	
Ranger's residence (replacement)	A DE LA	ME SHARE	1	Sund po	
Nature facility (replacement for nature hut)		A STATE ROOM	1	Res Cas	
Pavilion/Storage		a management	1	ST BEN	
Multi-use pavilions			1	and the sea	
Handy tool craft area	No. Sector		1		
Hoku kiu craft pavilion	141	- 1000 s 4000	1		
Welcome center		Conner 1	1		
7.07	TOTAL NEV	N, PHASE I	11	1.0	
TOTAL REMOVED, PHASE II			-14		
INCREASE/DECREASE, PHASE II					
	TOTAL BUILDINGS, PHASE II				
PHASE III NEW BUILDINGS	Existing	Phase F	Phase II	Phase III	
Environmental education/training center	and the second second			5	
	TOTAL NEW, PHASE II				
	TOTAL REMOVED, PHAS				
INCREASE/DECREAS				5	
			The statement of the second st		

EXHIBIT 9

۰.

TOTAL BUILDINGS, PHASE III

35