

BEFORE THE LAND USE COMMISSION

OF THE STATE OF HAWAI'I

In the Matter of the Petition of

DOCKET NO. A92-683

**HALEKUA DEVELOPMENT CORPORATION, a Hawai'i corporation**

To Amend the Agricultural Land Use District Boundary into the Urban Land Use District for Approximately 503.886 Acres at Waikele and Ho'ae'ae, 'Ewa, O'ahu, City and County of Honolulu, State of Hawai'i, Tax Map Key No. 9-4-02: 1, portion of 52, 70 and 71

**AFFIDAVIT OF STEVEN S.C. LIM**

STATE OF HAWAII )  
 ) ss.  
CITY AND COUNTY OF HONOLULU )

STEVEN S.C. LIM, being first sworn on oath, deposes and says that:

1. I am a partner in the firm of Carlsmith Ball LLP, located at 1001 Bishop Street, Suite 2100, American Savings Tower, Honolulu, Hawai'i, 96813, am duly admitted to practice law in the State of Hawai'i and am one of the attorneys for Successor Petitioner HO'OHANA SOLAR 1, LLC in the above-referenced Docket.

2. I have personal knowledge of the matters set forth herein and am qualified and competent to make this affidavit.

3. Attached hereto as Successor Petitioner's Exhibit 1 are true and correct copies of a map showing Parcel 52 and the Petition Area, TMK Nos. (1) 9-4-002:001 (por.) 052, 070, 071, 078, and 079, superimposed over the current tax map, and a GIS map showing the existing development southeast and adjacent to the Petition Area.

4. Attached hereto as Successor Petitioner's Exhibit 2A is a true and correct copy of a graphic showing the SLU District classifications of the Petition Area and surrounding properties.

5. Attached hereto as Successor Petitioner's Exhibit 2B is a true and correct copy of a map of the Petition Area with an Overlay of the current zoning.

6. Attached hereto as Successor Petitioner's Exhibit 2C is a true and correct copy of a map of the regions covered by the Central O'ahu Sustainable Communities Plan.

7. Attached hereto as Successor Petitioner's Exhibit 2D is a true and correct copy of relevant portions of the Honolulu City and County Land Use Ordinances Master Use Table 21-3.

8. Attached hereto as Successor Petitioner's Exhibit 3 is a true and correct copy of the excerpts from the 1996 Order, Docket No. A92-683.

9. Attached hereto as Successor Petitioner's Exhibit 4 is a true and correct copy of the Development Plan and Final Environmental Assessment for Royal Kunia, Phase II, Increment 3, dated May 1996.

10. Attached hereto as Successor Petitioner's Exhibit 5 is a true and correct copy of the August 2, 2012 Memorandum of Option Agreement recorded as Document No. A-46960924.

11. Attached hereto as Successor Petitioner's Exhibit 6 is a true and correct copy of a fact sheet detailing the Ho'ohana team's experience in renewable energy development.

12. Attached hereto as Successor Petitioner's Exhibit 7 is a true and correct copy of Robinson Kunia Land LLC's consent to Ho'ohana's Motion to Amend.

13. Attached hereto as Successor Petitioner's Exhibit 8 is a true and correct copy of a graphic explaining the Ho'ohana Solar Project's connection to the HECO electric grid vs. residential interconnection the grid.

14. Attached hereto as Successor Petitioner's Exhibit 9 is a true and correct copy of the Electrical Site Plan showing the location of the Solar Array Field and Project elements on Parcel 52.

15. Attached hereto as Successor Petitioner's Exhibit 10 is a true and correct copy of a photograph of the PV modules.

16. Attached hereto as Successor Petitioner's Exhibit 11 are true and correct copies of schematics of the PV modules racking and tracker systems, and the Project's substations, inverters, concrete pads, and fencing.

17. Attached hereto as Successor Petitioner's Exhibit 12 is a true and correct copy of the Archaeological Inventory Survey for Parcel 52 and Plantation Road.

18. Attached hereto as Successor Petitioner's Exhibit 13A is a true and correct copy of a letter from Senator Mike Gabbard in support of the Ho'ohana Solar Project.

19. Attached hereto as Successor Petitioner's Exhibit 13B is a true and correct copy of

a letter from Blue Planet Hawai'i in support of the Ho'ohana Solar Project.

20. Attached hereto as Successor Petitioner's Exhibit 13C is a true and correct copy of a letter from the Royal Kunia Country Club in support of the Ho'ohana Solar Project.

21. Attached hereto as Successor Petitioner's Exhibit 14 are true and correct copies of photos depicting a view study of the Ho'ohana Project from surrounding neighborhoods.

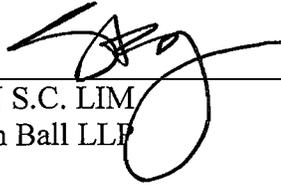
22. Attached hereto as Successor Petitioner's Exhibit 15 are true and correct copies of the title reports prepared by Title Guaranty of Hawai'i dated April 30, 2014 and May 2, 2014.

23. Attached hereto as Successor Petitioner's Exhibit 16 is a true and correct copy of the Letter from Steven S.C. Lim, Carlsmith Ball LLP, to Daniel Orodener, Executive Officer, Land Use Commission, State of Hawai'i, dated July 31, 2014.

24. I make this affidavit under Hawaii Administrative Rules, § 15-15-70(c).

Further affiant sayeth naught.

DATED: August 11, 2014

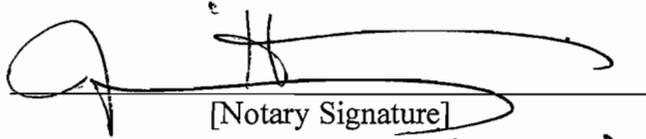


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STEVEN S.C. LIM  
Carlsmith Ball LLP

Attorneys for Successor Petitioner to Parcel 52  
HO'OHANA SOLAR 1, LLC

The attached Affidavit of Steven S.C. Lim which consists of 268 pages (including this page), was executed by Steven S.C. Lim, who was subscribed and sworn to before me this 11th day of August, 2014, in the First Judicial Circuit of the State of Hawai'i.

  
[Notary Signature]

Printed Name: Jeannie Hirabara

My commission expires: 2/7/18

