October 6, 2014

Mr. Daniel Orodenker
Executive Officer
Land Use Commission
State of Hawaii
235 South Beretania Street, Room 406
Honolulu, Hawaii 96813

Dear Mr. Orodenker:

SUBJECT: The Department of Planning and Permitting’s Response to the Motion by Ho’Ohana Solar 1, LLC to Amend the Decision and Order Regarding Docket No. A92-683, Halekua Development Corporation

This letter serves as our response to the Motion before the State Land Use Commission by Ho’Ohana Solar 1, LLC dated August 11, 2014. The Motion proposes a number of amendments to the above docket to allow a solar farm as a temporary use for up to 30 years on the site of Royal Kunia Phase II’s proposed Increment 3. Specifically, the motion requests that the Commission: (1) recognize Ho’Ohana Solar 1, LLC as the successor petitioner for the project site, (2) amend the previous Decision and Order to explicitly authorize the proposed interim use of the site as a solar farm, and (3) delete existing Condition No. 21 so that changes in ownership no longer need prior approval by the Commission.

We have no objections to the Motion and our response is as follows:

- The existing zoning of AG-1 Restricted Agricultural District allows solar farms, and solar farms contribute to State and county goals of achieving energy self-sufficiency.

- Constructing a housing development on the project site is not imminent as Increment 3 of Royal Kunia Phase II – must wait until other developers build spine infrastructure right up to its lower edges. This last and most isolated part of Village Park/Royal Kunia can only proceed after Increments 1 and 2 build their spine road,
sewer mains, and makai-bound drainage channels across their own lands in such a way that they link both Increment 3 and themselves to the spine infrastructure of Royal Kunia Phase I.

- The Robinson Estate’s decision to lease the property as a solar farm for the next 30 years suggests that the property does not have a realistic chance to enter the housing market over the next couple of decades.

- The delay in the development of Royal Kunia Phase II Increment 3 until 2045 or so is unlikely to negatively impact Oahu’s overall housing market, and thus we have no objections to the Motion before you.

We also recommend that the site be made available for compatible agricultural activities and when the solar farm is decommissioned, a disposal and recycling plan that is kept up to date, as recycling technologies improve in the future.

Should you have any questions, please contact Mike Watkins of our staff at 768-8044.

Very truly yours,

George I. Atta, FAICP
Director

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CERTIFICATE OF SERVICE

I hereby certify that copies of the Response to Motion of the Department of Planning and Permitting, City and County of Honolulu were duly served upon the following by either State or City Messenger, or hand delivery, or depositing the same, postage prepaid, in the U. S. Postal Service.

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DEPARTMENT OF PLANNING AND PERMITTING
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