

TABLE OF CONTENTS

	Page
1. PETITION CONTENT REQUIREMENTS	1
1.1 Name, Address and Telephone Number of Petitioner	1
1.2 Statement of Petitioner’s Interest in the Subject Matter, Including the Reasons for Submission of the Petition	1
1.3 Designation of Specific Statutory Provision, Rule, or Order in Question	2
1.4 Statement of Petitioner’s Position or Contention.....	2
1.5 Memorandum of Authorities, Containing a Full Description of Reasons and Legal Authorities in Support of Petitioner’s Position or Contention.....	2
1.5.1 Tax Map Key Numbers, Verification and Authorization from the Applicable Landowners	3
1.5.2 Proof of Qualification for Designation as IAL under HRS § 205-44.....	4
1.5.2.1 Land Currently Used for Agricultural Production - HRS § 205-44(c)(1) and HAR § 15-15-120(c)(1)	4
1.5.2.2 Land with Soil Qualities and Growing Conditions that Support Agricultural Production of Food, Fiber, or Fuel- and Energy-Producing Crops – HRS § 205-44(c)(2) and HAR § 15-15-120(c)(2)	8
1.5.2.3 Land Identified under Agricultural Productivity Rating – HRS § 205-44(c)(3) and HAR § 15-15-120(c)(3)	9
1.5.2.4 Land Types Associated with Traditional Native Hawaiian Agricultural Uses, such as Taro Cultivation, or Unique Agricultural Crops and Uses, such as Coffee, Vineyards, Aquaculture, and Energy Production – HRS § 205-44(c)(4) and HAR § 15-15-120(c)(4).....	11
1.5.2.5 Land with Sufficient Quantities of Water to Support Viable Agricultural Production – HRS § 205-44(c)(5) and HAR § 15-15-120(c)(5).....	11
1.5.2.6 Land Whose Designation as Important Agricultural Lands is Consistent with General, Development, and Community Plans of the County – HRS § 205-44(c)(6) and HAR § 15- 15-120(c)(6)	13
1.5.2.7 Land that Contributes to Maintaining a Critical Land Mass Important to Agricultural Operating Productivity – HRS § 205-44(c)(7) and HAR § 15-15-120(c)(7)	15

TABLE OF CONTENTS
(continued)

	Page
1.5.2.8 Land with or Near Support Infrastructure Conducive to Agricultural Productivity, Such as Transportation to Markets, Water or Power – HRS § 205-44(c)(8) and HAR § 15-15-120(c)(8).....	15
1.5.3 Current or Planned Agricultural Use of the Area Sought to be Designated as Important Agricultural Lands	15
1.6 Names of Any Other Potential Parties	15
1.7 Signature of Each Petitioner	16
1.8 Statement Whether the Petition for Declaratory Ruling Relates to Any Commission Docket for District Boundary Amendment or Special Permit.....	16
2. WAIVER OF 85/15 RECLASSIFICATION INCENTIVE	17
3. CONCLUSION.....	17

PETITIONER EXHIBITS:

Exhibit 1	Map of Kunia Land, Showing Proposed IAL Boundaries
Exhibit 2	Verification of Land Ownership
Exhibit 3	Landowner Authorization
Exhibit 4	Agricultural Land Assessment
Exhibit 5	Report of Findings on Cultural Research Related to the Designation of a Majority of Monsanto Company’s Oahu Land as Important Agricultural Lands
Exhibit 6	Map of Uses
Exhibit 7	Monsanto’s Farm Sustainability Practices (2016)
Exhibit 8	Water Use Permit No. 828
Exhibit 9	Water Use Data
Exhibit 10	Monsanto Comment Letter dated March 30, 2017