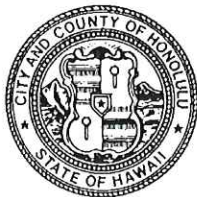


DEPARTMENT OF PLANNING AND PERMITTING  
**CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET, 7<sup>TH</sup> FLOOR • HONOLULU, HAWAII 96813  
PHONE: (808) 768-8000 • FAX: (808) 768-6041  
DEPT. WEB SITE: [www.honoluluapp.org](http://www.honoluluapp.org) • CITY WEB SITE: [www.honolulu.gov](http://www.honolulu.gov)

KIRK CALDWELL  
MAYOR



KATHY K. SOKUGAWA  
ACTING DIRECTOR

TIMOTHY F. T. HIU  
DEPUTY DIRECTOR

EUGENE H. TAKAHASHI  
DEPUTY DIRECTOR

2018/GEN-14(ry)

November 27, 2018

Mr. Daniel Orodener, Executive Officer  
Hawaii State Land Use Commission  
Department of Business, Economic  
Development & Tourism  
P. O. Box 2359  
Honolulu, Hawaii 96804-2359

Dear Mr. Orodener:

SUBJECT: A06-763 Kapolei Property Development, LLC  
Motion for Time Extension, Name Change, Amend Caption  
Department of Planning and Permitting Position Statement

The Department of Planning and Permitting of the City and County of Honolulu (hereinafter referred to as the "Department") has no objections to the motion of Kapolei Property Development, LLC, to modify Condition No. 17 of the Land Use Commission's Decision and Order dated November 20, 2007, for a time extension from December 31, 2018 to December 31, 2035. The time extension request is to allow additional time to complete the buildout of the Kapolei Harborside Center Project (hereinafter the "Project"), including completion of the backbone infrastructure. The Department also has no objections to the change of name of the applicant from Kapolei Property Development, LLC, to Kapolei Properties, LLC (hereinafter the "Petitioner"), and amend the caption for legal documents for the Project.

The Department's position is based on the 2008 global recession that affected the Petitioner's ability to complete the Project as required, and that the onset and magnitude of the recession was beyond the control of the Petitioner.

Furthermore, based on an industrial market assessment prepared by Colliers International Hawaii, dated February 2018, current economic conditions and projections signal there is pent-up demand for industrial land and with the amount of new supply of vacant industrial zoned land being added to the market, the study forecasts the probability of its absorption by 2035.

2018 NOV 30 A 8:07

LAND USE COMMISSION  
STATE OF HAWAII

Mr. Daniel Orodener  
November 27, 2018  
Page 2

Thank you for the opportunity to comment. Should you have any questions, please contact Raymond Young, of our staff, at (808) 768-8049.

Very truly yours,



Kathy K. Sokugawa  
Acting Director

KKS:ah

cc: Donna Y.L. Leong, Corporation Counsel  
Leo Asuncion, Office of Planning  
Jennifer A. Lim and Derek B. Simon  
Attorneys for Petitioner  
Carlsmith Ball LLP  
Dawn T. Apuna, Deputy Attorney General