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Attorneys for Successor Petitioner
KAMEHAMEHA SCHOOLS

BEFORE THE LAND USE COMMISSION
OF THE STATE OF HAWAI'I

In the Matter of the Petition of

TOM GENTRY AND GENTRY-PACIFIC,
LTD.

To Amend the Agricultural Land Use District
Boundary into the Urban Land Use District for
Approximately 1,395 Acres of Land at
Waiawa, Ewa, O'ahu, City and County of
Honolulu, State of Hawai'i, Tax Map Key
Nos.: 9-4-06: Portion of 26; 9-6-04: Portion of
1 and Portion of 16; and 9-6-05: Portion of 1,
Portion of 7 and Portion of 14

DOCKET NO. A87-610

SUCCESSOR PETITIONER'S FIRST
AMENDED LIST OF WITNESSES; FIRST
LIST OF REBUTTAL EXHIBITS;
EXHIBITS "42" - "48"; CERTIFICATE OF
SERVICE

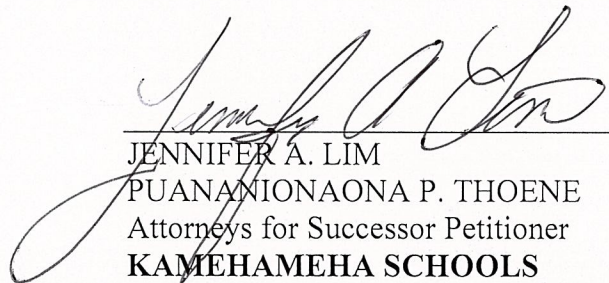
**SUCCESSOR PETITIONER'S FIRST AMENDED LIST OF WITNESSES; FIRST LIST
OF REBUTTAL EXHIBITS; EXHIBITS "42" - "48"**

Successor Petitioner LANCE KEAWE WILHELM, ROBERT K.W.H. NOBRIGA,
ELLIOT K. MILLS, MICAH A. KANE, and CRYSTAL KAUILANI ROSE, as TRUSTEES OF
THE ESTATE OF BERNICE PAUAHI BISHOP, dba KAMEHAMEHA SCHOOLS
("Successor Petitioner"), by and through its legal counsel, CARLSMITH BALL LLP, hereby
respectfully submits to the Land Use Commission of the State of Hawai'i (the "Commission")
its First Amended List of Witnesses, First List of Rebuttal Exhibits, and Exhibits "42" through

"48" in support of its Motion for Modification and Time Extension, filed with the Commission on July 24, 2019.

Successor Petitioner reserves the right to add or withdraw additional lay and expert witnesses, to call rebuttal witnesses, and to call any witness named by any other party. Successor Petitioner further reserves the right to amend its list of exhibits and identify additional exhibits not expressly noted herein in response to any pleadings, arguments, exhibits or witnesses identified by any party.

DATED: Honolulu, Hawai'i, November 4, 2019.



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LAND USE COMMISSION DOCKET NO. A87-610
SUCCESSOR PETITIONER KAMEHAMEHA SCHOOLS FIRST AMENDED LIST OF WITNESSES, November 4, 2019

NAME/ORGANIZATION/POSITION (list in order of appearance)	TO BE QUALIFIED AS A WITNESS IN:	SUBJECT MATTER	KS EXHIBIT NUMBER(S)	LENGTH OF DIRECT
Patrick Sullivan / Clearway Energy Group LLC / VP, Development	N/A	Project development	8, 15, 21, 29, 34, 46 - 47	15 minutes
Daniel von Allmen / Clearway Energy Group LLC / Manager, Project Development	N/A	Technical aspects of the project	8 -13, 15, 17, 21, 26-27, 29 - 32, 35, 46 - 47	15 minutes
Paul T. Matsuda, P.E., LEED AP / G70 / Director of Civil Engineering	Civil engineering	Civil engineering	8, 14, 36, 48	15 minutes
Jeffrey H. Overton / G70 / Principal Planner	Permitting and land use planning	Permitting and land use planning	1-6, 8, 16, 20, 22, 37, 46 - 47	10 minutes
Christopher M. Monahan / TCP Hawaii LLC / President, Archaeologist	Archaeology and HRS Chapter 6E compliance	Historic and archaeological resources; satisfaction of preservation plan	38 written direct testimony Ex. 45	10 minutes No oral testimony
Dan Ford / Ford & Associates, Inc. / Principal Geologist	Geology, environmental risk assessment, compliance, remediation	Groundwater impacts	8 - 14, 26 - 28, 39,	15 minutes
Eric B. Guinther / AECOS Inc. / Senior Ecologist	Ecology	Biological impacts	40 written direct	10 minutes No oral

			testimony Ex. 46	testimony
Sohrab Rashid / Fehr & Peers / Traffic Engineer, Principal	Traffic engineering	Traffic management	41 written direct testimony Ex 47	10 minutes No oral testimony
Dana K. N. Sato / Kamehameha Schools / Director of Asset Management	N/A	Project development; KS and renewable energy; current use of property	1-8, 13, 23 - 25, 42 - 44	20 minutes
Jason A. Jeremiah / Kamehameha Schools / Director, Natural and Cultural Resources	Cultural resources and practices; historic resources	Impacts to cultural and historic resources; traditional and customary practices on the KS Property	1, 2, 6, 8, 18 - 21, 29, 33, 45	10 minutes

LAND USE COMMISSION DOCKET NO. A87-610
SUCCESSOR PETITIONER KAMEHAMEHA SCHOOLS' FIRST LIST OF REBUTTAL EXHIBITS, November 4, 2019

KS EX. NO.	DESCRIPTION	PARTY OBJECTIONS	ADMIT
Successor Petitioner's Exhibits 1 - 25 were filed on July 24, 2019 with the Motion for Modification and Time Extension and Memorandum in Support of Motion			
1.	Survey map, updated July 10, 2015, outlining the 1,395 acre KS Property reclassified to the State Land Use Urban District under Docket No. A87-610		
2.	Graphic showing the State Land Use Districts of the KS Property, dated March 21, 2019		
3.	Graphic showing City and County of Honolulu zoning districts of the KS Property, dated March 20, 2019		
4.	Graphic showing Central Oahu Sustainable Communities Plan (2002) designations within the KS Property		
5.	Graphic showing Central Oahu Sustainable Communities Plan (proposed) designations within the KS Property		
6.	Graphic showing two-phase solar farm project within the KS Property approved by the Commission's <i>Order Granting Motion for Order Amending Findings of Fact, Conclusions of Law and Decision and Order Dated May 17, 1988</i> , filed November 26, 2014		
7.	Kamehameha Schools annual report to the Commission, dated May 29, 2019		
8.	Conceptual Site Plan of the Waiawa Solar Power, LLC project site, dated July 9, 2019		
9.	Information regarding battery systems and storage		

10.	Samsung Technical Specifications regarding battery energy storage system		
11.	NOVEC Technical Specifications Document on 3M Novec 1230 Fire Protection Fluid		
12.	Envirotemp FR3 Fluid Technical Specifications Document		
13.	Department of Health letter to Kamehameha Schools, dated March 28, 2019		
14.	Waiawa Solar Farm Preliminary Engineering Considerations, by G70, dated July 19, 2019		
15.	Construction Traffic Assessment for the Proposed Waiawa Solar Farm, by Fehr & Peers, dated July 19, 2019		
16.	Waiawa Solar Power View Studies, by G70, dated March 2019		
17.	Waiawa Solar Project Glint & Glare Analysis, by Capitol Airspace Group, dated March 26, 2019		
18.	State Historic Preservation Division letter dated April 24, 2015 accepting Archeological Inventory Survey for the KS Property		
19.	Final Archaeological Preservation Plan (May 2015) by TCP Hawaii, LLC, and State Historic Preservation Division acceptance letter, dated September 14, 2015		
20.	July 19, 2019 notification from TCP Hawaii, LLC to State Historic Preservation Division of proposed Waiawa Solar Power project and confirmation of installation of preservation fencing		
21.	Biological surveys for a solar electrical generating facility in Waiawa, Central Oahu, by AECOS, Inc., dated July 22, 2019		
22.	Excerpt of the Honolulu Land Use Ordinance, Revised Ordinances of Honolulu, Chapter 21, Table 21-3 (Master Use Table)		

23.	Act 97 (2015) relating to renewable energy standards, approved by Governor Ige on June 8, 2015		
24.	Press Release: Governor Ige signs bill setting 100 percent renewable energy goal in power sector, dated June 5, 2018		
25.	KS Motion to Amend Service of Process Checklist, dated July 24, 2019		
Successor Petitioner's Exhibits 26 - 41 were filed on October 7, 2019 as supporting documents to the Motion for Modification and Time Extension and Memorandum in Support of Motion			
26.	Letter from Clearway Energy Group, LLC to the Department of the Navy, dated July 22, 2019		
27.	Letter from Department of the Navy to Clearway Energy Group, LLC, dated September 30, 2019		
28.	Groundwater Impact Assessment for the Proposed Waiawa Solar Project, by Ford & Associates, Inc., dated October 5, 2019		
29.	Biological surveys for the gen-tie route from a solar electrical generating facility in Waiawa, central O'ahu, by AECOS, Inc., dated September 24, 2019		
30.	Meeting Agenda and Meeting Minutes for Pearl City NB # 21 August 27, 2019 meeting		
31.	Meeting Agenda for Mililani / Waipio / Melemanu NB # 25 September 25, 2019 meeting		
32.	Materials Provided to Mililani Mauka NB #35 August 20, 2019		
33.	Resume of Jason A. Jeremiah, Kamehameha Schools		
34.	Resume of Patrick Sullivan, Clearway Energy Group LLC		

35.	Resume of Daniel von Allmen, Clearway Energy Group LLC		
36.	Resume of Paul T. Matsuda, G70		
37.	Resume of Jeffrey H. Overton, G70		
38.	Resume of Christopher M. Monahan, TCP Hawaii LLC		
39.	Resume of Dan Ford, Ford & Associates, Inc.		
40.	Resume of Eric B. Guinther, AECOS Inc.		
41.	Resume of Sohrab Rashid, Fehr & Peers		
Successor Petitioner's Exhibits 42 - 48 were filed on November 4, 2019 as supporting documents to the Motion for Modification and Time Extension and Memorandum in Support of Motion			
42.	Findings of Fact, Conclusions of Law and Decision and Order filed May 17, 1988 in Docket A87-610		
43.	Order Granting Motion to Amend Condition No. 6 of the Decision and Order Dated May 17, 1988, filed on November 30, 1990 in Docket A87-610		
44.	Order Granting Motion for Order Amending Findings of Fact, Conclusions of Law and Decision and Order Dated May 17, 1988, filed on November 26, 2014 in Docket A87-610		
45.	Written direct testimony of Christopher M. Monahan / TCP Hawaii LLC / President, Archaeologist		
46.	Written direct testimony of Eric B. Guinther / AECOS Inc. / Senior Ecologist		
47.	Written direct testimony Sohrab Rashid / Fehr & Peers / Traffic Engineer, Principal		
48.	Figure 1 (conceptual site plan) of Preliminary Civil Engineering Considerations report (KS		

	Ex. 14)		
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**SUCCESSOR PETITIONER KAMEHAMEHA SCHOOLS – MOTION FOR
MODIFICATION AND TIME EXTENSION LUC DOCKET NO. A87-610**

WRITTEN DIRECT TESTIMONY OF CHRISTOPHER M. MONAHAN, PH.D.

1. **Please state your name and business address for the record.**

Chris Monahan, Ph.D.
150 Hamakua Drive, # 810
Kailua, HI 96734

2. **What is your current occupation?**

I am the president and founder of TCP Hawai'i, LLC ("TCP Hawai'i"). TCP Hawai'i is an archaeology and cultural resource firm.

3. **How long have you worked in the field of archaeology?**

I have been actively engaged in the field of archaeology and historic preservation for over 30 years, 18 of which have been in Hawai'i. In 2006 I was the Lead Archaeologist and Acting Branch Chief on O'ahu for the State Historic Preservation Division ("SHPD"). I have also been a lecturer at U.H Manoa in the Department of Anthropology.

4. **Did you provide a copy of your resume for these proceedings?**

Yes, my resume was provided as Successor Petitioner Kamehameha Schools ("KS") Exhibit 38.

5. **Please briefly describe your educational background.**

I have a Bachelor of Arts in Anthropology from St. Lawrence University (with a concentration in archaeology) and a Master's degree and Ph.D. in Anthropology from the University of Wisconsin-Madison.

6. **Do you specialize in any particular areas?**

I specialize in conducting archaeological and cultural resource surveys and historic preservation studies, including work on Hawaiian archaeology, cultural studies, archaeological assessments, reconnaissance, inventories, site testing, recovery, preservation planning, burial treatment plans, and monitoring. TCP Hawai'i is on SHPD's list of approved archaeological consultants. (Our 2019 Permit # 19-08).

7. **What does a Hawaii archaeologist do?**

Study the past and address historic preservation laws through the investigation of properties for the presence/absence of archaeological site-features, and if site-features are found, assess the significance of the items found, describe possible effects on such historic properties based upon the particular development proposal being considered, and provide mitigation commitments for each historic property that may be affected by the proposed development. We also prepare plans to address the particular mitigation