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State of Hawai'i Land Use Commission  
Department of Business, Economic Development & Tourism  
P.O. Box 2359  
Honolulu, Hawai'i 96804-2359



Re: Kamehameha Schools – Motion for Modification and Time Extension

Dear Chair and Commissioners:

I am Jeff Overton, a principal planner at G70, and I am testifying in support of KS's Motion for Modification and Extension of Time ("Motion") that will allow Waiawa Solar Power, LLC's ("WSP") solar project to go forward.

As background, my career as a land use planner and environmental consultant spans 36 years, including planning and permitting for eight commercial solar projects since 2014. G70 has assisted and continues to assist Clearway and its subsidiaries, like WSP, with their land use planning and permitting requirements on its solar projects in Hawai'i, including the one at Waiawa. Given our past work with Clearway on its solar projects, I am familiar with the land use permitting and time requirements for solar projects such as the one before you.

### **Background Regarding the Solar Project**

The Waiawa solar farm project consists of a 36 megawatt/144 megawatt-hour battery energy storage solar farm with related electrical improvements and overhead utility tie-ins ("**Project**"). The Project is proposed to be installed within an approximately 200-acre area (the "**Project Site**") in the central eastern portion of the 1,395-acre KS property that is within the State Urban District Property at Waiawa, 'Ewa, O'ahu ("**KS Property**" or "**Petition Area**"), with the utility tie-in, or gen-tie, route running from the Project site west and within the Petition Area, across the gulch near the Ka Uka Boulevard exit of the H-2 Freeway, to reach the point of interconnection on the existing HECO 46kV Waiau-Mililani line. The actual lot coverage footprint of the Project elements will be only 83 acres.

### **Location of Project**

The Project is located on KS's petition area in Waiawa and Waipio, 'Ewa, O'ahu, Hawai'i, and is designated by Tax Map Key Nos. (1) 9-4-006:034(por.), 035(por.), 036, 037(por.); 9-6-004:024 (por.); 025, 026; 9-6-005:003 (por.). KS Exhibit 1. The KS Property is located east of the H-2 Freeway/Ka Uka Boulevard interchange, and west of Pearl City. The Petition Area is in the SLU Urban District. KS Exhibit 2.

The Petition Area is designated for urban type uses (e.g., residential, commercial, recreational, and industrial) under both the current (2002) and proposed Central O'ahu Sustainable Communities Plan land use maps. KS Exhibits 4 and 5, respectively.

There is a mixture of County zoning within the Petition Area. It includes Neighborhood Business District (B-1), Community Business District (B-2), Low Density Apartment District (A-1), Medium Density Apartment District (A-2), Industrial-Commercial Mixed Use District (IMX1), Residential District (R-5) and General Preservation (P-2). KS Exhibit 3. The Project Site is zoned AG-1.

**Permits Required:**

WSP will need to get a Conditional Use Permit – Minor to allow the construction on lands zoned as Restricted Agricultural (AG-1). In addition, other ministerial construction site permits, such as a grading, grubbing, stockpiling, NPDES construction stormwater and building permits will also be required.

Following the Commission's approval of the Motion for Modification, a Conditional Use Permit application will be submitted, followed by a number of building, electrical and civil permits, as well as grading permits. It will take approximately 4-6 months for the approval of the CUP application and approximately 8 to 9 months for approval of the ministerial permits. These timelines do not include internal preparation of the permits or consultations with the county prior to filing. Construction will take approximately a year.

Based on this timetable and past experience with similar projects, WSP is already significantly constrained on its overall permitting and construction timeline and needs approval of the Motion for Modification this month in order to make its operational deadline of Fourth Quarter 2021 as required by the Purchase Power Agreement with HECO.

With respect to decommissioning of the project, about 6 months will be set aside for permitting based on current requirements. This does not take into consideration any environmental studies or consultations that may need to be completed to ensure compliance with state and federal regulations. It is my understanding that construction activities associated with decommissioning could take a year.

In conclusion, I strongly support WSP's solar project and urge this Commission to approve KS' Motion today to allow the project to move forward and meet its PPA requirements.

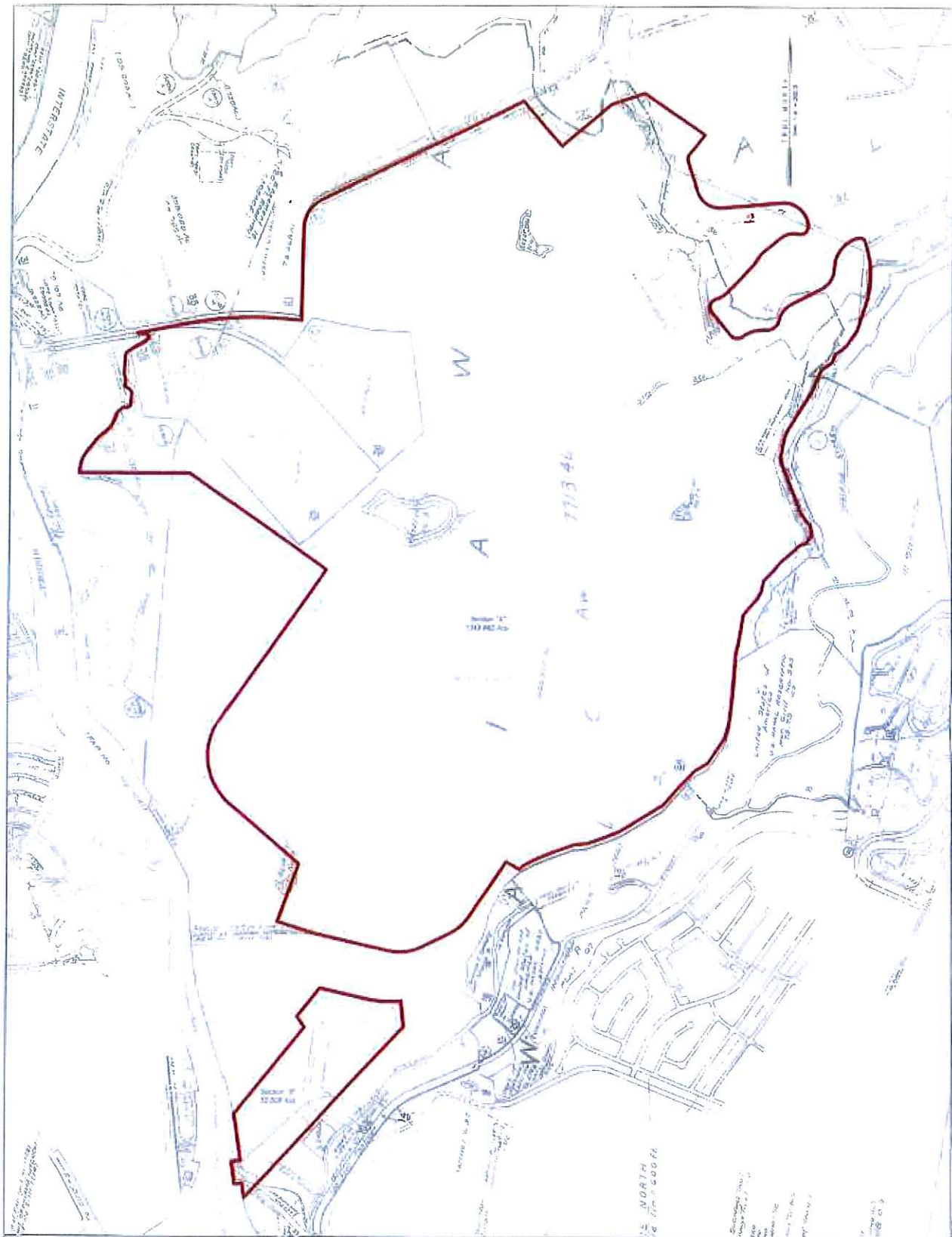
Sincerely,

GROUP 70 INTERNATIONAL, INC., dba G70



Jeffrey H. Overton, AICP, LEED AP  
Principal

Enclosures



**SURVEY SHOWING  
SECTIONS "A" & "B"**  
described in Liber 22151 Pg 250  
overlayed on Tax Map Keys:  
9-4-06, 9-6-04, and 9-6-05

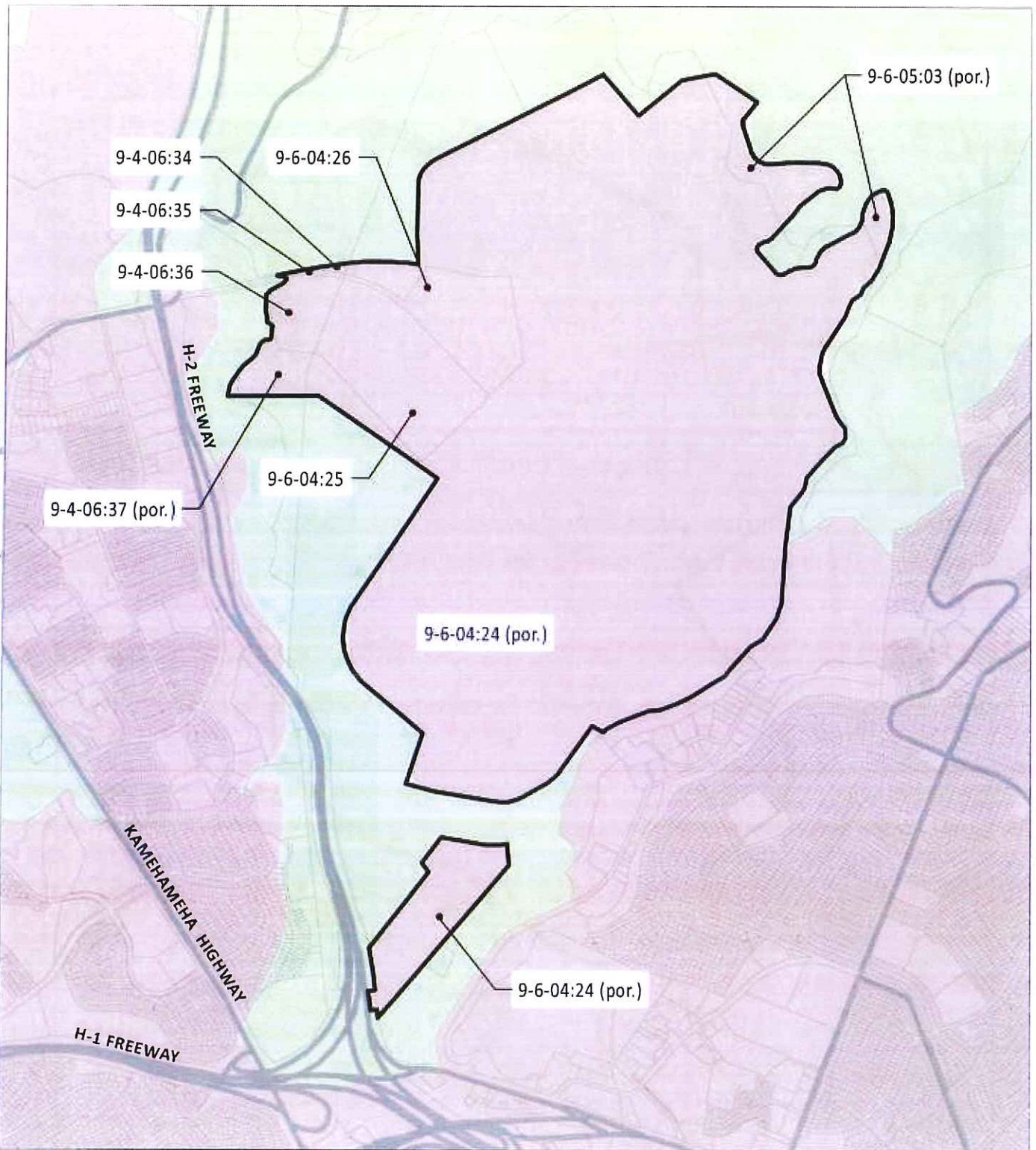
AT WAIKAWA AND WAIPIO, EWA, OAHU, HAWAII

**KS Exhibit 1**







**ACLAND SURVEYING LLC**  
Kean & Co.  
Professional Land Surveyors  
Certificate No. 10000  
Land Grant Survey No. 284

Revised July 10, 2015



DATE: 3/21/2019

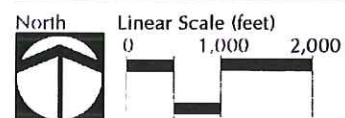
## LEGEND

	Agricultural District		Rural District
	Conservation District		Urban District

Source: SunEdison (2014), State Land Use Commission (2019)

Disclaimer: This Graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.

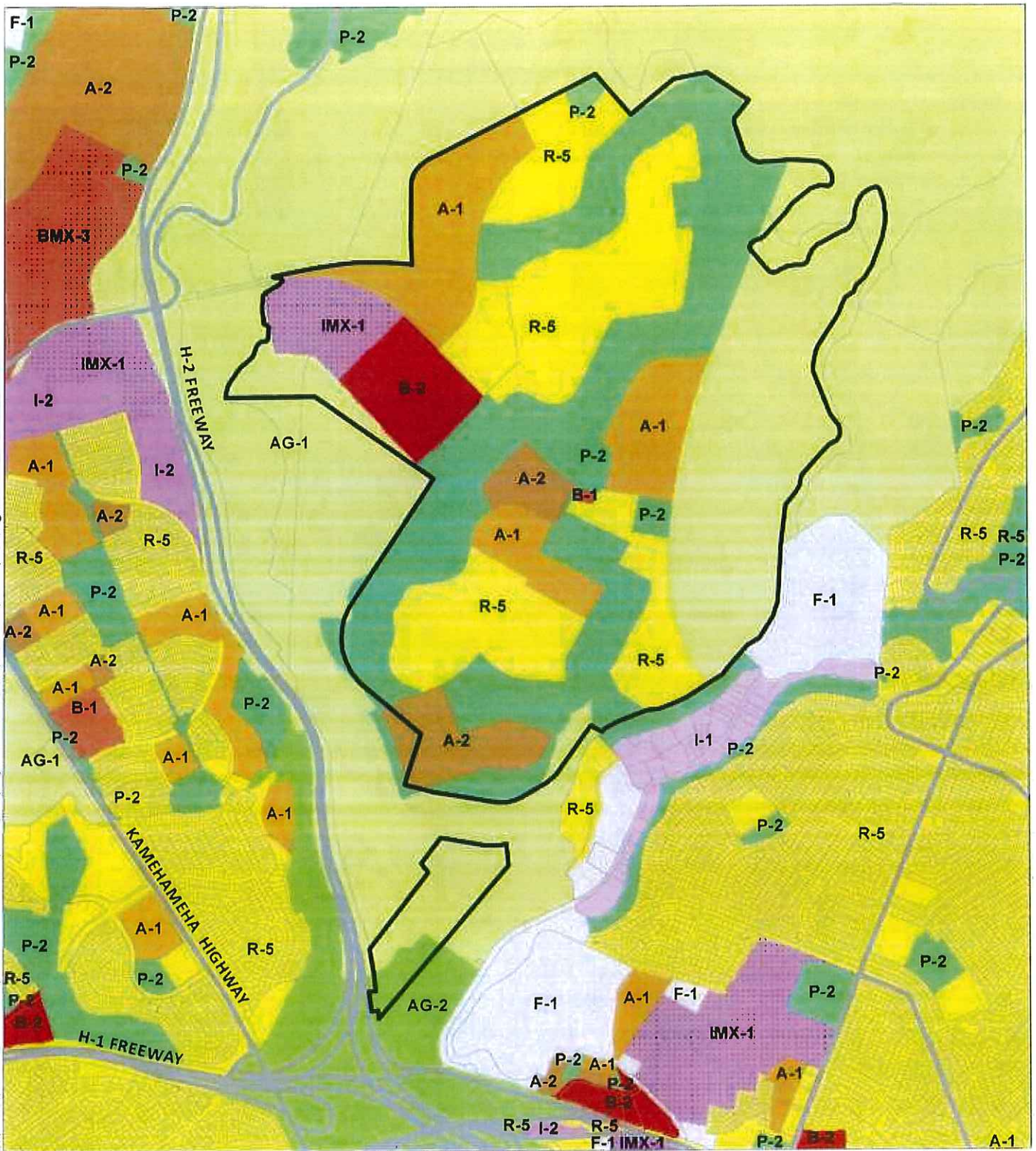
## KS Exhibit Urban District Boundary KAMEHAMEHA SCHOOLS WAIAWA MOTION TO AMEND



Island of O'ahu



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DATE: 3/20/2019

### LEGEND

KS Waiawa Property (SLU Urban, Docket A87-610)

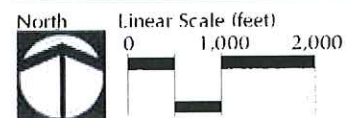
AG-1	R-5	B-1	F-1
AG-2	A-1	B-2	I-1
P-2	A-2	BMX-3	I-2
			IMX-1

Source: City and County of Honolulu (2019)

Disclaimer: This Graphic has been prepared for general planning purposes only and should not be used for boundary Interpretations or other spatial analysis.

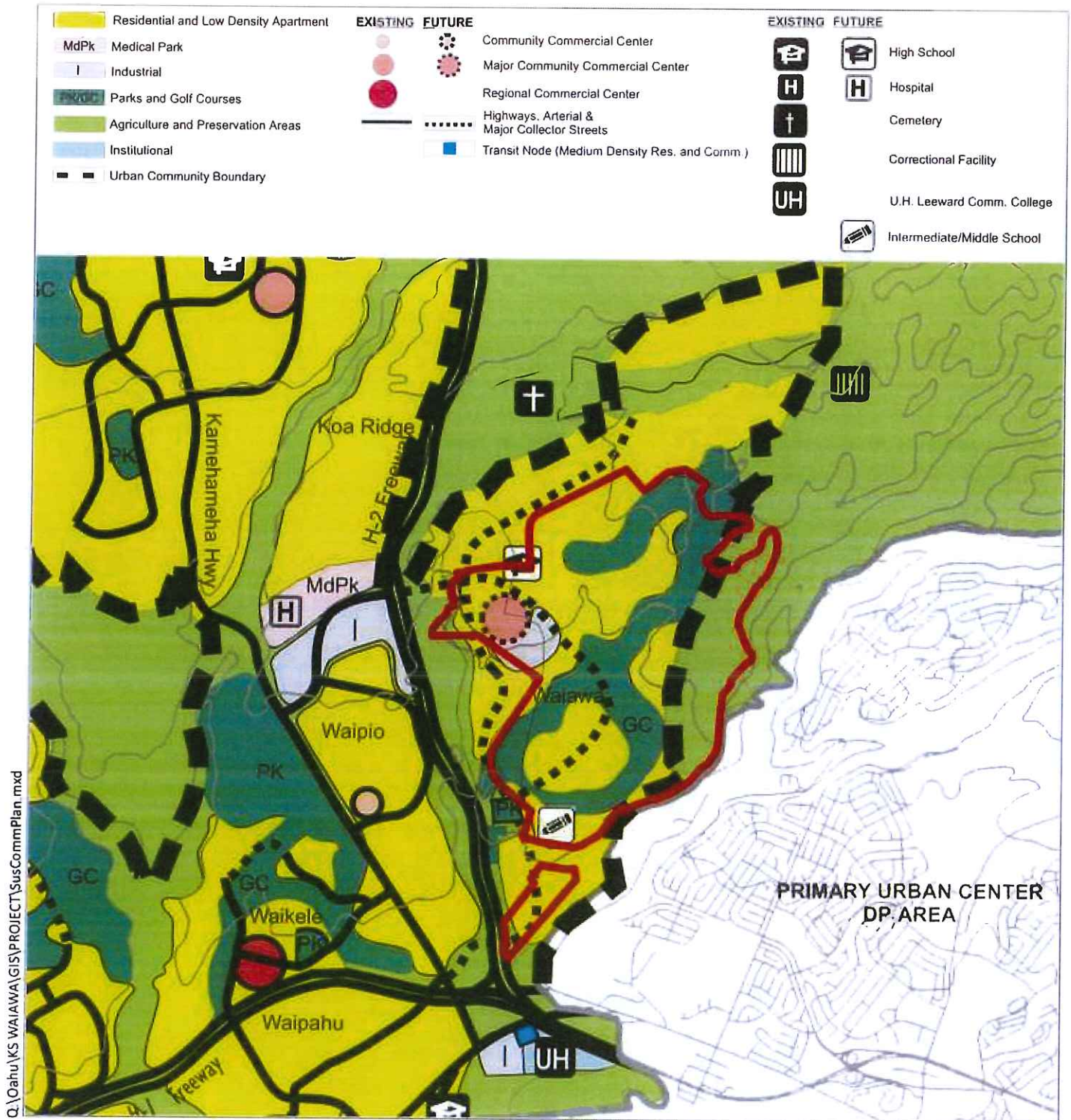
### KS Exhibit County Zoning

### KAMEHAMEHA SCHOOLS WAIAWA MOTION TO AMEND



Island of O'ahu





#### LEGEND

[Red Outline Box] KS Waiawa Property (SLU Urban, Docket A87-610)

Source: City and County of Honolulu (2002)

Disclaimer: This Graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.

KS Exhibit 4

#### KS Exhibit Central Oahu Sustainable Communities Plan KAMEHAMEHA SCHOOLS WAIAWA MOTION TO AMEND

North

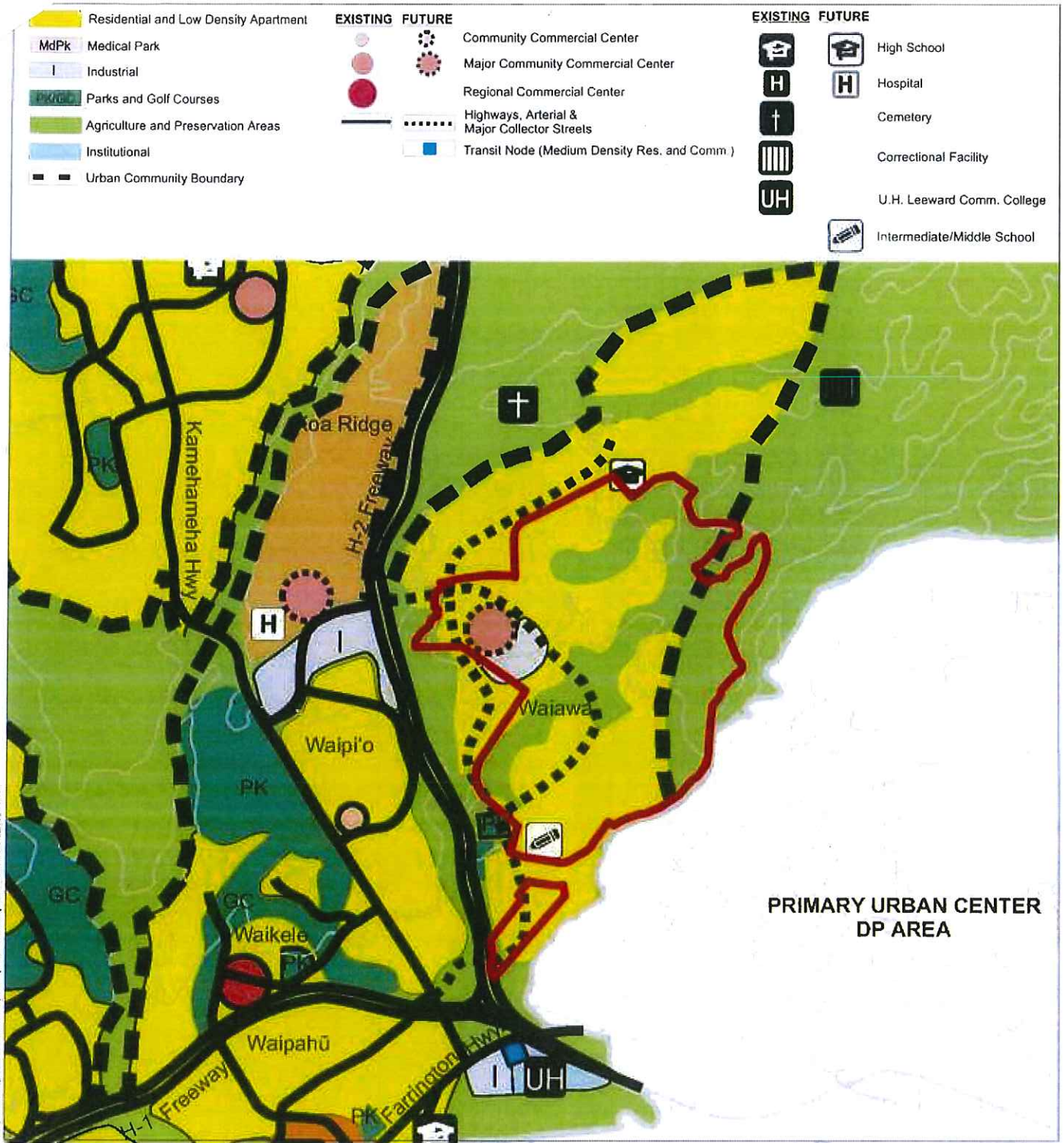


(Not to Scale)

Island of O'ahu



Q:\Oahu\KS WAIAWA\GIS\PROJECT\SusCommPlan.mxd



DATE: 4/10/2019

## LEGEND

KS Waiawa Property (SLU Urban, Docket A87-610)

## KS Exhibit Central Oahu Sustainable Communities Plan KAMEHAMEHA SCHOOLS WAIAWA MOTION TO AMEND

Source: City and County of Honolulu (2016)

Disclaimer: This Graphic has been prepared for general planning purposes only and should not be used for boundary interpretations or other spatial analysis.

KS Exhibit 5



(Not to Scale)

Island of O'ahu



Clearway Waiawa Solar - Project Schedule											
2019					2020				2021		
Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
<b>Planning &amp; Permitting</b>											
Project Planning & Design											
State Land Use Commission - Zoning Amendment											
County Conditional Use Permit (Minor)											
Building Permit Review											
Grading Permit Review											
<b>Construction</b>											
Site Clearing/Grading											
System Construction											
System Operation											