

DAVID Y. IGE  
GOVERNOR



STATE OF HAWAII  
DEPARTMENT OF TRANSPORTATION  
869 PUNCHBOWL STREET  
HONOLULU, HAWAII 96813-5097

2020 OCT 29 AM 11:55

CITY & COUNTY OF HONOLULU

JADE T. BUTAY  
DIRECTOR

Deputy Directors  
LYNN A.S. ARAKI-REGAN  
DEREK J. CHOW  
ROSS M. HIGASHI  
EDWIN H. SNIFFEN

IN REPLY REFER TO:  
DIR 0943  
STP 8.3064

October 23, 2020

Ms. Kathy K. Sokugawa  
Acting Director  
Department of Planning and Permitting  
City and County of Honolulu  
650 South King Street, 7<sup>th</sup> Floor  
Honolulu, Hawaii 96813

Attention: Mr. Raymond Young

Dear Ms. Sokugawa:

Subject: Special Use Permit (SUP) Application No. 2020/SUP-6  
West Oahu Solar Plus Storage Project  
Ewa, Oahu, Hawaii  
Tax Map Key: (1) 9-2-002:007 (Por.)

The State of Hawaii, Department of Transportation (HDOT) has reviewed the subject SUP application and understands the applicant is proposing to develop a 12.5-megawatt photo-voltaic energy generation system and accessory 50-megawatt-hour battery storage system, and interconnection and ancillary support facilities on a 97-acre site in Honouliuli.

HDOT previously reviewed and commented on the Draft Environmental Assessment (EA) dated March 2020 and included Traffic Impact Analysis Report (TIAR) dated February 18, 2020.

HDOT has no objection to the SUP application.

The project descriptions and TIAR is unchanged from the Draft EA with respect to impacts to State highways. No significant adverse impacts on State highways are anticipated during project operations and no traffic improvements are proposed or warranted. The potential construction-related traffic impacts will be addressed in a traffic management plan that will be reviewed by HDOT and the City and County of Honolulu, Department of Transportation Services.

The HDOT Draft EA comments are summarized in the Final EA and HDOT has no further comments regarding the project.

Ms. Kathy K. Sokugawa  
October 23, 2020  
Page 2

STP 8.3064

If there are any questions, please contact Mr. Blayne Nikaido of the HDOT Statewide Transportation Planning Office at (808) 831-7979 or via email at [blayne.h.nikaido@hawaii.gov](mailto:blayne.h.nikaido@hawaii.gov).

Sincerely

A handwritten signature in black ink, appearing to read "Jade T. Butay". The signature is written in a cursive style with a large, sweeping flourish at the end.

JADE T. BUTAY  
Director of Transportation

POLICE DEPARTMENT  
CITY AND COUNTY OF HONOLULU

801 SOUTH BERETANIA STREET · HONOLULU, HAWAII 96813  
TELEPHONE: (808) 529-3111 · INTERNET: www.honolulu-pd.org

2020 NOV -2 PM 1:29

HIRK CALDWELL  
MAYOR



DEPT OF PLANNING  
AND PERMITTING  
CITY & COUNTY OF HONOLULU  
SUSAN BALLARD  
CHIEF

JOHN D. McCARTHY  
CLYDE K. HO  
DEPUTY CHIEFS

OUR REFERENCE EO-DK

October 30, 2020

**MEMORANDUM**

TO: Kathy K. Sokugawa, Acting Director  
Department of Planning and Permitting

ATTENTION: Raymond Young, Acting Branch Chief, Community Planning Branch

FROM: Rade K. Vanic, Assistant Chief of Police, Support Services Bureau

SUBJECT: Special Use Permit Application No. 2020/SUP-6  
West Oahu Solar Plus Storage Project  
Tax Map Key 9-2-002: Portion 007, Honouliuli, Ewa, Oahu

This is in response to your agency's memorandum of October 8, 2020, requesting input on the subject project.

The Honolulu Police Department has reviewed the information provided and does not have any concerns at this time.

If there are any questions, please call Major Craig Uehira of District 8 (Waianae, Kapolei) at 723-8400.

Thank you for the opportunity to review the plans.

A handwritten signature in black ink, appearing to read "Rade K. Vanic".

Rade K. Vanic  
Assistant Chief of Police  
Support Services Bureau

HONOLULU FIRE DEPARTMENT  
**CITY AND COUNTY OF HONOLULU**

636 South Street  
Honolulu, Hawaii 96813-5007  
Phone: 808-723-7139 Fax: 808-723-7111 Internet: www.honolulu.gov/hfd

2020 NOV -6 PM 1:47

CITY & COUNTY OF HONOLULU

KIRK CALDWELL  
MAYOR



MANUEL P. NEVES  
FIRE CHIEF

LIONEL CAMARA JR.  
DEPUTY FIRE CHIEF

November 6, 2020

TO: KATHY SOKUGAWA, ACTING DIRECTOR  
DEPARTMENT OF PLANNING AND PERMITTING

ATTN: RAYMOND YOUNG, ACTING BRANCH CHIEF  
COMMUNITY PLANNING BRANCH

FROM: MANUEL P. NEVES, FIRE CHIEF

SUBJECT: SPECIAL USE PERMIT APPLICATION NO. 2020/SUP-6  
WEST OAHU SOLAR PLUS STORAGE PROJECT  
HONOULIULI, EWA, OAHU  
TAX MAP KEY: 9-2-002: PORTION 007

In response to your memorandum dated October 8, 2020, regarding the abovementioned subject, the Honolulu Fire Department (HFD) reviewed the submitted information and requires that the following be complied with:

1. Fire department access roads shall be provided such that any portion of the facility or any portion of an exterior wall of the first story of the building is located not more than 150 feet from fire department access roads as measured by an approved route around the exterior of the building or facility. (National Fire Protection Association [NFPA] 1; 2012 Edition, Sections 18.2.3.2.2 and 18.2.3.2.2.1.)

A fire department access road shall extend to within 50 feet of at least one exterior door that can be opened from the outside and that provides access to the interior of the building. (NFPA 1; 2012 Edition, Section 18.2.3.2.1.)

Kathy Sokugawa, Acting Director  
Page 2  
November 6, 2020

2. A water supply approved by the county, capable of supplying the required fire flow for fire protection, shall be provided to all premises upon which facilities or buildings, or portions thereof, are hereafter constructed, or moved into or within the county. When any portion of the facility or building is in excess of 150 feet from a water supply on a fire apparatus access road, as measured by an approved route around the exterior of the facility or building, on-site fire hydrants and mains capable of supplying the required fire flow shall be provided when required by the AHJ [Authority Having Jurisdiction]. (NFPA 1; 2012 Edition, Section 18.3.1, as amended.)
3. The unobstructed width and unobstructed vertical clearance of a fire apparatus access road shall meet county requirements. (NFPA 1; 2012 Edition, Sections 18.2.3.4.1.1 and 18.2.3.4.1.2, as amended.)
4. The project shall comply with all fire code requirements for photovoltaic systems (NFPA 1; 2012 Edition, Section 11.12).
5. The project shall comply with all fire code requirements for battery storage systems (NFPA 1; 2012 Edition, Chapter 52).
6. Submit civil drawings to the HFD for review and approval.

Should you have questions, please contact Battalion Chief Wayne Masuda of our Fire Prevention Bureau at 723-7151 or [wmasuda@honolulu.gov](mailto:wmasuda@honolulu.gov).



MANUEL P. NEVES  
Fire Chief

MPN/TC:bh

# BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU  
630 SOUTH BERETANIA STREET  
HONOLULU, HI 96843  
www.boardofwatersupply.com



2020 NOV -9 AM 11:10

November 4, 2020

KIRK CALDWELL, MAYOR

BRYAN P. ANDAYA, Chair  
KAPUA SPROAT, Vice Chair  
RAY C. SOON  
MAX J. SWORD

ROSS S. SASAMURA, Ex-Officio  
JADE T. BUTAY, Ex-Officio

ERNEST Y. W. LAU, P.E.  
Manager and Chief Engineer

ELLEN E. KITAMURA, P.E.  
Deputy Manager and Chief Engineer *ME*

TO: KATHY K. SOKUGAWA, ACTING DIRECTOR  
DEPARTMENT OF PLANNING AND PERMITTING

ATTN: RAYMOND YOUNG  
COMMUNITY PLANNING BRANCH

FROM: ERNEST Y. W. LAU, P.E., MANAGER AND CHIEF ENGINEER *eyw*

SUBJECT: MEMORANDUM DATED OCTOBER 8, 2020 REQUESTING  
COMMENTS ON THE SPECIAL USE PERMIT APPLICATION NO.  
2020/SUP-6 WEST OAHU SOLAR PLUS STORAGE PROJECT  
LOCATED NORTH OF PALEHUA ROAD AND H-1 FREEWAY  
TAX MAP KEY: 9-2-002: 007 (PORTION)

The existing water system is adequate to accommodate the proposed solar and battery storage project. However, please be advised that this information is based upon current data, and therefore, the Board of Water Supply (BWS) reserves the right to change any position or information stated herein up until the final approval of the building permit application. The final decision on the availability of water will be confirmed when the building permit application is submitted for approval.

Proposed water connection designs for the solar storage facility shall be submitted for our review and approval. Construction schedule shall be coordinated with the BWS to minimize impacts to our water system.

Water service cannot be made to the proposed compatible agricultural activities. The existing BWS water system has limited capacity and cannot accommodate the additional agricultural demands.

The developer should investigate the feasibility of developing its own private source water or using non-potable water sources, such as the Waiahole Ditch, for irrigation of the proposed agricultural activities. If non-potable water is either unavailable or infeasible, a report of the investigation should be submitted to us before we will consider the use of potable water.

The parcel is located above the potable aquifer, within the BWS No-Pass Zone and close to the Department of Health's capture zone delineation of a major BWS water source. Therefore, the developer will be required to submit and implement a soil and water conservation plan with best management practices to prevent contamination of the underlying aquifer.

Ms. Kathy Sokugawa  
November 4, 2020  
Page 2

If water is made available for the proposed solar and storage project, the applicant will be required to pay our Water System Facilities Charges for resource development and transmission.

The developer will be required to obtain a water allocation letter from the University of Hawaii West Oahu for the use of their East Kapolei 440' reservoir as storage.

Water conservation measures are required for the proposed development. These measures include utilization of nonpotable water for irrigation using rain catchment, drought tolerant plants, xeriscape landscaping, efficient irrigation systems, such as a drip system and moisture sensors, and the use of Water Sense labeled ultra-low flow water fixtures and toilets.

The on-site fire protection requirements should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.

If you have any questions, please contact Robert Chun, Project Review Branch of our Water Resources Division at 748-5443.



## HAWAII STATE ENERGY OFFICE STATE OF HAWAII

235 South Beretania Street, 5th Floor, Honolulu, Hawaii 96813  
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

DAVID Y. IGE  
GOVERNOR

SCOTT J. GLENN  
CHIEF ENERGY OFFICER

2020 NOV 10 10:22  
Telephone: (808) 587-3807  
Web: energy.hawaii.gov  
DEPT. OF PLANNING AND PERMITTING  
CITY & COUNTY OF HONOLULU

November 9, 2020

Ms. Kathy Sokugawa  
Acting Director  
Department of Planning and Permitting  
City and County of Honolulu  
Via email: [info@honoluluDPP.org](mailto:info@honoluluDPP.org)

Mr. Raymond Young  
Staff Planner, Community Planning Branch  
Department of Planning and Permitting  
City and County of Honolulu  
Via email: [rscopyoung@honolulu.gov](mailto:rscopyoung@honolulu.gov)

**Subject: Hawai'i State Energy Office Comments on the AES West Oahu Solar Plus Storage Project**

Dear Acting Director Sokugawa and Mr. Young:

The Hawai'i State Energy Office (HSEO) offers the following comments on the West Oahu Solar Plus Storage Project (Project) proposed by AES Distributed Energy, Inc. HSEO's comments are guided by HSEO's statutory purpose under H.R.S. §196-71 and its mission to promote energy efficiency, renewable energy and clean transportation to help achieve a resilient, clean energy, carbon negative economy. As an island community currently dependent on imported fossil fuels for nearly 70% of its electrical power, Hawai'i is particularly vulnerable to fuel and energy disruptions, unpredictable cost fluctuations, unintended fuel releases into marine environments, and the many impacts of climate change. HSEO believes the Project offers many beneficial impacts to mitigate these vulnerabilities. Additionally, renewable energy developments such as this create jobs and commerce activities that support Hawaii's near-term economic recovery from the COVID-19 crisis.

Like its heavy reliance on imported energy, Hawai'i relies heavily on imported food. A significant increase in local food production is not only necessary for Hawai'i to become self-sustainable, it would also help grow Hawai'i's economy. In 2012, the Hawai'i Office of Planning estimated about 85-90% of Hawai'i's food was imported and replacing just 10% of the food imported would amount to approximately \$313 million dollars remaining in Hawai'i.<sup>1</sup> The Project would be located on approximately 60-70 acres<sup>2</sup> of currently fallow Agricultural land

<sup>1</sup> *Increased Food Security and Food Self-Sufficiency Strategy*, Office of Planning, Department of Business, Economic Development, and Tourism, in cooperation with the Department of Agriculture, p. ii (Oct. 2012).

<sup>2</sup> Makakilo / Kapolei / Honokai Hale Neighborhood Board No. 34 Meeting, (Aug. 26, 2020) ([olelo.granicus.com/player/clip/77991?view\\_id=20&redirect=true](http://olelo.granicus.com/player/clip/77991?view_id=20&redirect=true)).



(zoned AG-1 at the county level) with most of the photovoltaic panels on land with B soil classification.<sup>3</sup> The site has a history of agricultural production and is close to supportive infrastructure and other active farming operations. Accordingly, AES is developing a compatible agricultural plan including the incorporation of compatible agricultural activities within the Project area such as livestock grazing and production and honey production.<sup>4</sup> At the August 26, 2020, Makakilo / Kapolei / Honokai Hale Neighborhood Board No. 34 Meeting during which the Project was discussed, Board Member Dr. Kioni Dudley objected to using high quality agricultural land north of H-1 for non-agricultural uses such as the Project.<sup>5</sup>

HSEO understands that the Project would occupy 60-70 acres of farmland for at least 25 years and offers its comments to help inform decisionmakers of the trade-offs the Project presents from an energy, carbon offset, and jobs perspective.

### Renewable Energy and Greenhouse Gas Reduction

Hawai'i has mandated that 100 percent of the electrical energy sold by Hawai'i's electrical utilities must come from renewable energy sources by the year 2045, with upcoming interim mandates of 30% by 2020 and 40% by 2030.<sup>6</sup> The 12.5 megawatt (MW) solar photovoltaic plus storage Project would contribute 0.5 percent towards Hawaiian Electric's renewable energy portfolio over 25 years.<sup>7</sup> HSEO estimates the Project would have provided 0.42 percent of the electricity sold on Oahu by Hawaiian Electric in 2019.<sup>8</sup> The Project's storage capacity would also enable Hawaiian Electric to utilize stored solar energy to meet peak energy demand.

In August 2019, the Hawaii Public Utilities Commission (PUC) approved the 25-year contract under which Hawaiian Electric would buy power from the Project at approximately \$0.10 per kilowatt-hour and found the contract to be prudent and in the public interest.<sup>9</sup> Hawaiian Electric estimates the Project would save ratepayers with an average monthly bill of 500 kilowatt-hours per month an estimated \$0.22 per month in 2022 and up to \$0.91 per month over the 25-year term of the Project.<sup>10</sup>

HSEO appreciates the importance of this Project in contributing to plans to retire Hawai'i's only existing coal-fired power plant by September 2022. The 180 MW coal-fired plant in Campbell Industrial Park, O'ahu, is the largest single power generator on O'ahu's system and meets 16 percent of O'ahu's peak energy demand according to Hawaiian Electric. In 2016, the coal plant contributed 20.4 percent of the greenhouse gas emissions (GHG) generated by large existing stationary sources with potential GHG emissions at or above

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<sup>3</sup> *Final Environmental Assessment and Finding of No Significant Impact, West Oahu Solar Plus Storage Project (FEA-FONSI)*, Figure 3-6, p. 129 (June 2020).

<sup>4</sup> Makakilo / Kapolei / Honokai Hale Neighborhood Board No. 34 Meeting, (Aug. 26, 2020).

<sup>5</sup> Makakilo / Kapolei / Honokai Hale Neighborhood Board No. 34 Meeting, (Aug. 26, 2020).

<sup>6</sup> Section 269-92, Hawaii Revised Statutes.

<sup>7</sup> *FEA-FONSI*, p. 1-3.

<sup>8</sup> *Hawaiian Electric Renewable Portfolio Standard Status Report for 2019* (Feb. 11, 2020); *Decision and Order No. 36480, For Approval of Power Purchase Agreement for Renewable Dispatchable Generation with AES West Oahu Solar, LLC.*, Docket No. 2019-0050, p. 51 (Aug. 20, 2019).

<sup>9</sup> *Decision and Order No. 36480, For Approval of Power Purchase Agreement for Renewable Dispatchable Generation with AES West Oahu Solar, LLC.*, Docket No. 2019-0050, p. 83 (Aug. 20, 2019).

<sup>10</sup> *FEA-FONSI*, p. 1-3.

100,000 tons per year, including Hawai'i's large electric power plants, petroleum refineries, and industrial facilities.<sup>11</sup>

It has been estimated that the Project's electricity production will replace the equivalent of approximately 7% of the coal plant's generating capacity and provide a meaningful contribution to offset a portion of the lost generation from the coal plant when it is retired.<sup>12</sup> AES also estimates the Project would provide electricity equivalent for approximately 4,600 homes, offset approximately 545,794 barrels of fuel oil and 64 tons of coal, and decrease GHG emissions by approximately 244,394 tons over its lifetime.<sup>13</sup>

### Jobs and Economy

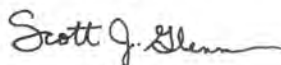
The *Final Environmental Assessment and Finding of No Significant Impact (FEA-FONSI)* for the Project states construction of the Project would support a total of 118 jobs in the State of Hawai'i and approximately \$11.3 million in labor income, with total economic output of approximately \$20.2 million. The FEA-FONSI also states over its 25-years lifetime the Project would support approximately 7.6 total (direct, indirect, and induced) jobs in Hawai'i and approximately \$0.7 million in labor income, with total economic output of approximately \$1.2 million.<sup>14</sup> HSEO echoes the sentiment of the Hawai'i PUC that clean energy development can accelerate Hawai'i's economic recovery from the losses caused by COVID-19.

### Community Input

The Community Meeting and Outreach Summary Report in the Final Environmental Assessment (FEA) for the Project (Appendix K) identifies various issues and recommendations offered by community members and key elected officials. Stakeholders expressed a desire to be involved in the Project permit processes, which could include conditions to approval, and the measures pursued by AES to mitigate the concerns expressed. HSEO encourages AES to continue its proactive community engagement and participation, including regular communication with the Makakilo / Kapolei / Honokai Hale Neighborhood Board No. 34.

If you have any questions, please feel free to contact me at [dbedt.energyoffice@hawaii.gov](mailto:dbedt.energyoffice@hawaii.gov).

Sincerely,



Scott J. Glenn  
Chief Energy Officer

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<sup>11</sup> *Hawai'i Greenhouse Gas Emissions Report for 2016, Final Report*, p. 145-146 (Dec. 2019), [https://health.hawaii.gov/cab/files/2019/12/2016-Inventory\\_Final-Report\\_December2019-1.pdf](https://health.hawaii.gov/cab/files/2019/12/2016-Inventory_Final-Report_December2019-1.pdf)

<sup>12</sup> FEA-FONSI, p. 24 of 27.

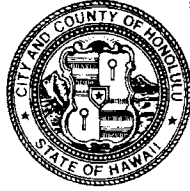
<sup>13</sup> FEA-FONSI, p. 1-3.

<sup>14</sup> FEA-FONSI, p. 3-70.

DEPARTMENT OF ENVIRONMENTAL SERVICES  
**CITY AND COUNTY OF HONOLULU**

1000 ULUOHIA STREET, SUITE 308, KAPOLEI, HAWAII 96707  
TELEPHONE: (808) 768-3486 • FAX: (808) 768-3487 • WEBSITE: <http://envhonolulu.org>

KIRK CALDWELL  
MAYOR



2020 OCT 27 PM 2:18

LORI M.K. KAHIKINA, P.E.  
DIRECTOR

TIMOTHY A. HOUGHTON  
DEPUTY DIRECTOR

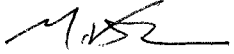
ROSS S. TANIMOTO, P.E.  
DEPUTY DIRECTOR

IN REPLY REFER TO:  
PRO 20-113

October 23, 2020

**MEMORANDUM**

TO: Raymond Young, Acting Branch Chief  
Community Planning Branch  
Planning Division  
Department of Planning and Permitting

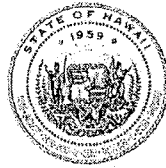
FROM:   
Michael O'Keefe  
Executive Assistant II

SUBJECT: Special Use Permit Application No. 2020/SUP-6  
West Oahu Solar Plus Storage Project  
Tax Map Key 9-2-002: Portion 007, Honolulu, Ewa, Oahu

We have reviewed the subject document as transmitted to us by your memo dated October 8, 2020, reference number 2020/SUP-6(ry). We have no comments or objections to the proposed project.

Should you have any questions, please call Lisa Kimura, Civil Engineer at 768-3455.

DAVID Y. IGE  
Governor



**LAND USE COMMISSION**  
Department of Business, Economic Development & Tourism  
State of Hawai'i

2020 OCT 27 AM 8:30  
DANIEL E. GRODENKER  
Executive Officer  
DEPARTMENT OF PLANNING  
CITY & COUNTY OF HONOLULU

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October 22, 2020

Mr. Raymond Young, Acting Branch Chief  
Community Planning Branch  
Department of Planning and Permitting  
City and County of Honolulu  
650 South King Street, 7<sup>th</sup> Floor  
Honolulu, Hawai'i 96813

Dear Mr. Young:

Subject: Special Use Permit Application No. 2020/SUP-6  
West Oahu Solar Plus Storage Project  
Tax Map Key: 9-2-002: Portion 007  
Honouliuli, Ewa, O'ahu

We are in receipt of your memorandum dated October 8, 2020, forwarding the Summary Description and Location Map for Special Use Permit Application No. 2020/SUP-6 ("Application").

Based on our review of the Summary Description as well as the Application and Final Environmental Assessment ("FEA") provided by your link, we understand that AES West Oahu Solar, LLC ("Applicant"), proposes to establish a 12.5-megawatt photovoltaic energy generation system and accessory 50-megawatt-hour battery storage system, and ancillary support facilities (collectively "Project"). More specifically, the Project will include: (1) a solar photovoltaic system, (2) a battery energy storage system, (3) a network of electrical collector lines, (4) project substation and Hawaiian Electric interconnection equipment, (5) communication equipment, and (6) service roads and fencing. Compatible agricultural activities will also be part of the overall Project. The Project is expected to have an operational life of approximately 25 years.

We confirm that the 97-acre Project site is designated within the State Land Use Agricultural District. According to the FEA, the Project site includes lands with soil classified by the Land Study Bureau's ("LSB") detailed land classification as overall (master) productivity rating class B (approximately 48 acres), class D (approximately 36 acres), and class E (approximately 13 acres). The Project site does not include any class A soils. Because the Project will occur on lands with soil classified by the LSB's detailed land classification as

overall (master) productivity rating class B, we confirm that the following requirements of Hawai'i Revised Statutes ("HRS") § 205-4.5(a)(21), as noted in the Application and FEA, are applicable:

- (A) The area occupied by the solar energy facilities is also made available for compatible agricultural activities at a lease rate that is at least fifty percent below the fair market rent for comparable properties;
- (B) Proof of financial security to decommission the facility is provided to the satisfaction of the appropriate county planning commission prior to date of commencement of commercial generation; and
- (C) Solar energy facilities shall be decommissioned at the owner's expense according to the following requirements:
  - (i) Removal of all equipment related to the solar energy facility within twelve months of the conclusion of operation or useful life; and
  - (ii) Restoration of the disturbed earth to substantially the same physical condition as existed prior to the development of the solar energy facility.

In this case, the Project will occupy a land area greater than 20 acres,<sup>1</sup> and therefore will require a special use permit from the Land Use Commission ("LUC") pursuant to HRS § 205-6. As such, in the event the City and County of Honolulu Planning Commission ("Planning Commission") acts favorably on the Application, we request that your office closely cooperate with the LUC staff to ensure the timely and orderly transmittal of the record on the matter.

With respect to the issues described in the Application and FEA, we note that the State Historic Preservation Division's ("SHPD") review and acceptance of the Archaeological Inventory Survey Report ("AISR") is pending at this time. As part of the AISR fieldwork, two historic properties were documented within the Project site: historic irrigation and plantation infrastructure and the Waiāhole Ditch System. The AISR found that the Project will have no effect on significant historic properties within the Project site, and therefore no mitigation commitments are required. It is anticipated that the Applicant will obtain the SHPD's letter of concurrence regarding the findings of the AISR and submit said letter to the Department of Planning and Permitting during the course of acquiring the required permits for the Project. In this regard, we share the Office of Planning's concern that the SHPD's concurrence should be a part of the record prior to any decision by the Planning

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<sup>1</sup> We acknowledge that the Project is not expected to occupy the entire 97 acres of the Project site and will, in fact, be a subset of the area.

Mr. Raymond Young, Acting Branch Chief

October 22, 2020

Page 3

Commission on the Application. As such, clarification should be provided whether such concurrence has been obtained at this stage of the entitlement process.

We also note that as part of the Cultural Impact Analysis, Ms. Lynette Paglinawan, one of the cultural practitioners and educators familiar with the Project site, recommended that a wall of trees be planted surrounding the site as restitution to the wandering spirits believed to congregate in the area. The Applicant responded that this recommendation would be considered as part of the landscaping effort for the Project. Given the cultural significance of the area, we urge the Applicant to continue consulting with Ms. Paglinawan to ensure her concerns are fully addressed in the landscaping plan.

Finally, we note that honey production and cattle production and grazing have been identified in the Application and FEA as the most promising compatible agricultural activities given the site-specific conditions and the general lack of water availability. However, it has come to our attention that cattle production and grazing may not be feasible given that there may be insufficient ground clearance from the proposed structures for the cattle to graze productively. As such, we suggest that the Department of Agriculture be consulted in regard to potential alternatives that are suitable for the Project site.

We have no further comments to offer at this time. Thank you for the opportunity to provide comments on the Application.

Should you have any questions or require further clarification, please call our office at 587-3822.

Sincerely,



Daniel E. Orodenker  
Executive Officer

DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 768-4730 • web: www.honolulu.gov

KIRK CALDWELL  
MAYOR



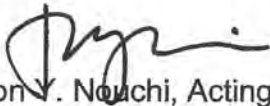
JON Y. NOUCHI  
ACTING DIRECTOR  
DREANALEE KALILI  
DEPUTY DIRECTOR

TP10/20-829297

November 23, 2020

**MEMORANDUM**

TO: Kathy K. Sokugawa, Acting Director  
Department of Planning and Permitting (DPP)

FROM:   
Jon Y. Nouchi, Acting Director  
Department of Transportation Services

SUBJECT: Special Use Permit Application No. 2020/SUP-6  
West Oahu Solar Plus Storage Project  
TMK 9-2-002: Portion 007, Honouliuli, Ewa, Oahu,

In response to your letter dated October 8, 2020, we have the following comments.

1. **Traffic Impact Analysis Report (TIAR).** The applicant shall submit the native files (e.g., Synchro, Excel, etc.) for the raw multi-modal counts and accompanying analysis to the Regional Planning Branch.
2. **Street Usage Permit.** A street usage permit from the Department of Transportation Services should be obtained for any construction-related work that may require the temporary closure of any traffic lane on a City street.
3. **General Comment.** Construction materials and equipment should be transported to and from the project site during off-peak traffic hours (8:30 a.m. to 3:30 p.m.) to minimize any possible disruption to traffic on the local streets.
4. **Vehicle/Bicycle/Pedestrian Crossing.** Any existing pedestrian, bicycle and vehicle access/crossing shall be maintained with the highest safety measures during construction.

2020 NOV 27 AM 7:52  
LULG

Kathy K. Sokugawa, Acting Director  
November 23, 2020  
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5. **Neighborhood Impacts.** The area representatives, neighborhood board, as well as the area residents, businesses, emergency personnel (fire, ambulance, and police), Oahu Transit Services, Inc. (TheBus and TheHandi-Van), etc., should be kept apprised of the details and status throughout the project and the impacts that the project may have on the adjoining local street area network.

Thank you for the opportunity to review this matter. Should you have any questions, please contact Virginia Sosh, of my staff, at 768-5461.

✓ cc: Raymond Young, Acting Branch Chief  
Community Planning Branch, DPP