



Hawaii's Thousand Friends

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DEPT OF PLANNING
AND PERMITTING
CITY & COUNTY OF HONOLULU

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Department of Planning and Permitting
Mr. Raymond Young, Acting Branch Chief
Community Planning Branch
Via email: info@honoluludpp.org

Special Use Permit Application No. 2020/SUP-6
West Oahu Solar Plus Storage Project

Hawaii's Thousand Friends opposes granting a Special Use Permit (SUP) for the AES West Oahu Solar project on 48-acres of Land Study Bureau productivity rated Class B within the 98-acre parcel.

Hawai'i has a long history of encouraging agriculture beginning with Article XI Section 3 of the State Constitution "to promote diversified agriculture, increase agricultural self-sufficiency and assure the availability of agriculturally suitable lands."

Act 183 was passed in 2005 to provide standards, criteria and processes to identify important lands.

In 2008 Act 233 created incentives to identify, map and designate important lands.

Created in 2015 the Aloha+ Challenge, with input from stakeholder and community members, is a statewide commitment to reaching sustainable goals built on six pillars of sustainability two of which are clean energy and local food production.

The states 100% renewable energy goal of 100% by 2045 is not land specific.

The states goal to double local food production and increase access to land resources is land specific.

According to the Land Study Bureau (LSB), which relies on several land-based factors to evaluate and identify land for successful food production, land Classified B has an over-all productivity rating of 70-84% with Class C lands having a 55-69% over-all productivity rating.

This project pits the goal for clean energy against the need to increase access to land resources to support production of local food with the goal to at least double local food production and access to land by 2030, which is a mere 9 years away.

The SUP should not be granted because it removes 48 acres of agricultural land zoned AG-1 Restricted, which has a Land Study Bureau Class B rating from being available for food production. Each time important agricultural land is permitted for non-agricultural uses the State's goal of doubling food production by 2030 and the State becoming food self-sufficient moves further out of reach.

The SUP should not be granted because this site has access to Waiahole ditch water. Access to water is critical to the success of farming as noted by the LSB rating system "irrigated lands are rated 100 because the moisture requirement is adequately met." A solar farm does not need access to water sources.

The SUP should not be granted because there is no guarantee that when the proposed 25-year agreement ends that a new agreement will not be renegotiated or a new solar agreement will be enacted with another solar provider for another 25 years. It is easy to visualize that once the infrastructure is in this site will forever be a solar farm and the important Class B and C soil and water rich land will be lost to farming forever.

While pueo are found on all islands they are only listed as endangered on Oahu. Though no pueo were detected during multiple surveys it does not mean that this endemic species does not frequent the area. Just the opposite is true. Honouliuli Ahupua`a is historically known to be the location with the greatest number of pueo.

The SUP should not be granted because the project will be built on agricultural land. The DOFAW 2018 Pueo Project found pueo densities highest in agricultural areas and short grasslands. With an estimated 800+ pueo remaining on Oahu every acre of agricultural land is critical to their survival.

The Hawaiian hoary bat *ʻōpeʻapeʻa*, endemic to the islands, is the only extant and native terrestrial mammal in the state. The *ʻōpeʻapeʻa* is federally listed as endangered under the Endangered Species Act and in 2015 was named the state official land mammal.

The SUP should not be granted because the applicant "did not include focused surveys" for the federally listed endemic and endangered Hawaiian hoary bat. This is a remarkable decision given the status and fragility of the *ʻōpeʻapeʻa* and the ability to easily detect them with ultrasonic bat detectors.

This SUP should not be granted because the University of Hawai'i "requested that the landscaping effort avoid planting or large trees." This is a remarkable and unacceptable request because trees approximately 40-50 feet would shield neighboring Makakilo and provide habitat for the hoary bat.

If reaching energy self-sufficiency is the utmost goal then attaining food self-sufficiency will be almost impossible as projects such as this gobble up land identified as important for food production.

As a state with two important but competing goals there must be a way to accommodate both without giving up important agricultural land needed for our state to become food self-sufficient.