

**LUC DOCKET NO.
A89-651 HASEKO (EWA)**

MOTION FOR APPROVAL OF JOB CREDITS

Staff Report

Hearing: 12/7/2022



Daniel E. Orodener, Executive Officer

Submitted: November , 2022

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GENERAL BACKGROUND ON MOTIONS

Any party may make motions before, during, or after the close of a hearing. This motion is a post decision and order motion to modify conditions in the existing decision and order (Docket A89-651 dated October 17, 1990).

According to LUC administrative rules, "*...if a motion requires consideration of facts not appearing of record, it shall be supported by affidavits or declarations.*" (§ 15-15-70(c), Hawai'i Administrative Rules (HAR)).

Under LUC rule § 15-15-94(b), HAR

"...for good cause shown, the commission may act to modify or delete any of the conditions imposed or modify the commission's order."

In Black's Law Dictionary (abridged 5th Edition), "good cause" is defined as "*... a substantial reason ... legally sufficient ground or reason ... (p)hrase depends upon circumstances of individual case, and finding of its existence lies largely in discretion of officer or court to which decision is committed ...*"

In considering a motion to modify or delete conditions, the Commission has discretion to consider such factors as: whether the need for the condition still exists; if an alternate method for ensuring compliance exists that protects the public trust; or, if compliance with the condition would create an undue hardship.

The current motion is requesting approval of 572.75 Job Credits, which consists of 236.13 Construction Job Credits, 229.06 Facility Job Credits and 107.56 Training Job Credits (credits reported from 1991 through 2020) in response to Condition 1, as amended of approval of the D&O which required Petitioner to obtain one job credit for every hotel or hotel/condominium unit Petitioner was allowed to build, based on facts that have occurred since the original docket record was closed.

DOCKET A89-651 BACKGROUND

HASEKO (Ewa), Inc., and a number of its affiliates (sometimes collectively, "HASEKO") are the current property owners and/or developers of the Ocean Pointe and Hoakalei Projects (sometimes referred to as the "Project"), formerly known as the 'Ewa Marina Community Development Project.

Project Description

Ocean Pointe/Hoakalei was a 1,100-acre master-planned project located at Honouliuli in the 'Ewa District of O'ahu that lay along the shoreline between Fort Weaver Road and Kalaeloa (the former Naval Air Station Barbers Point), about 20 miles west of Honolulu. The Project included a manmade recreational lagoon (which was originally planned to be a marina, and could still eventually become one in the distant future) with a light industrial, commercial, and retail facilities component, as well as visitor accommodations. Also included within the Project was a golf course, a 20-acre district park and child care center, a public elementary school, and up to 4,850 homes.

Ownership of the Property

HASEKO (Hawaii), Inc., purchased the approximately 1,100-acre Ocean Pointe/Hoakalei property in 1988 from M.S.M. & Associates, Inc., which was then in bankruptcy, and from The Estate of James Campbell. In 1992, the entire 1,100 acres were transferred from HASEKO (Hawaii), Inc. to a wholly owned subsidiary, HASEKO (Ewa), Inc.

As construction of the residential components of the Project proceeded, parcels were conveyed to development entities affiliated with HASEKO, and subsequently to individual homeowners in fee simple.

A 22,905 square foot commercial lot along Fort Weaver Road was conveyed from HASEKO to Arthur Howard and Leslie Gail Howard in 2002; a 0.441 acre lot along Kapolei Parkway was conveyed to Hawaiian Electric Company, Inc., in 2006; a

1.043 acre commercial lot along Keone'ula Boulevard was conveyed from HASEKO to Frederick Hoon Yuk Lau and Judy Mariko Lau in 2007; and the Hoakalei Country Club golf course and clubhouse lands were conveyed by HASEKO to Hoakalei Country Club L.P. in December 2014 (and conveyed thereafter to its affiliate, Hoakalei Country Club Godo Kaisha).

Nearly 12 acres at the northeastern point of the Project area were conveyed in 2005 to the State of Hawai'i for a school site. Adjacent to the school site is a district park and a child care center. In 2007, approximately 1.25 acres were conveyed to Seagull Schools for the child care center. Just over one acre of land was conveyed to the City and County of Honolulu in 2008 for relocation of the Ewa Beach Fire Station to the northeast corner of the Project site. HASEKO conveyed approximately 18.75 acres to the City for a district park in November 2014 and conveyed approximately 9 acres to the City for the expansion of One'ula Beach Park in July 2015.

Boundary Reclassifications

The lands that encompass Ocean Pointe/Hoakalei were reclassified from the Agriculture to the Urban District in four separate LUC actions. The December 20, 1974 approval of Boundary Review LUC Docket No. 074-23, reclassified approximately 320 acres along Fort Weaver Road to the Urban District. There were no conditions attached to that reclassification. In 1984, under Docket No. A83-558, approximately 181 acres of Agriculture land was reclassified to the Urban District. This D&O included 11 conditions, which were also attached to the 320 acres that had been previously reclassified. In 1990, under Docket No. A89-651, the LUC reclassified the remainder of the 1,100 acres from the Agriculture District to the Urban District.

Docket A89-651 History

HASEKO (HAWAII), INC., a Hawaii corporation ("Petitioner"), filed a Petition on December 8, 1989 and an Amendment to Petition For Land Use District Boundary

Amendment on March 5, 1990 (collectively referred to as the "Petition"), pursuant to
LUC Docket No. A89-651 HASEKO (EWA): STAFF REPORT
Motion for Approval of Job Credits

Chapter 205, Hawaii Revised Statutes ("HRS"), as amended ("HRS"), and the Hawaii Land Use Commission Rules, Title 15, Subtitle 3, Chapter 15, Hawaii Administrative Rules ("Commission Rules"), as amended, to amend the Land Use District Boundary to reclassify approximately 389 acres of land situated at Honouliuli, Ewa, Oahu, State of Hawai'i, identified as Oahu Tax Map Key Nos.: 9-1-12: portion of 5, portion of 6 and portion of 23 (hereinafter referred to as "Petition Area" or sometimes as "Phase II"), from the Agricultural District to the Urban District.

Petitioner proposed to develop the Petition Area as Phase II of its approximately 1,100-acre proposed Ewa Marina Project (hereinafter sometimes referred to as "Ewa Marina").

The Land Use Commission of the State of Hawai'i (hereinafter the "Commission"), having heard and examined the testimony, evidence and argument of the parties and/or counsel for the parties presented during the hearings, and the parties' proposed findings of fact, conclusions of law and decision and order, and the Office of State Planning's Stipulation to Petitioner's Findings of Fact and Conclusions of Law approved the reclassification on October 17, 1990

2021 Reported Status of Project Development

Construction of Ocean Pointe began in 1997 with the residential component of the Project. Residential construction continues to this day and is anticipated to continue for about another ten years. As of 2021, nearly eighty-two percent (82%) of the permitted 4,850 housing units have been built and sold to individual homeowners.

¹ In 1964, the State began to implement the State Land Use District boundary classifications. At that time, the shorefront lands of the Project (including the approximately 9-acre ocean front parcels and much of the area encompassing the then proposed marina) were placed within the Urban District, with the remainder being classified as Agriculture .

In moving forward to the development of the resort portion of the master plan, the name Hoakalei was selected to distinguish this part of the Project, which includes the golf course, lagoon, commercial, resort and residential components.

Gradual grading of the golf course was initiated in the late 1990s to provide drainage basins for the residential components that were being constructed. In 2005, Ernie Els was commissioned to design the golf course, which opened for play in January 2009. Sankara Hawaii, LLC, an affiliate of Hoakalei Country Club Godo Kaisha (the current owner of the golf course) completed and opened the permanent clubhouse to members in 2019.

Excavation of the proposed marina also began in the late 1990s. Wet excavation commenced in late 2003 following confirmation from the Department of the Army Corps of Engineers that HASEKO had fulfilled all of the pre-construction requirements. Excavated material provides fill for other portions of the Project; thus, excavation has been coordinated with the residential and golf course development. Although most of the basin excavation has been completed, breakout to the ocean has not commenced. On November 6, 2011, HASEKO announced its intention to use the basin as a recreational lagoon to facilitate the completion of the rest of the project.

Although HASEKO no longer plans to complete a marina, the company is not doing anything that would prohibit someone else from choosing to do so in the distant future once entitlements/permits have been updated/obtained. Construction of the Waterfront Recreation Facility [nka The LineUp at Wai Kai] started earlier this year, starting the development of the Lagoon area.

JOB CREDITS CONDITION (CONDITION 1 OF THE OCTOBER 17, 1990 LUC DECISION & ORDER (“D&O”) AND AMENDED IN 1994)

Condition 1 of the October 17, 1990 D&O required Petitioner to obtain one job credit for every hotel or hotel/condominium unit Petitioner was allowed to build. Petitioner still has not built any

hotel or hotel/condominium units. As described below, credits are calculated based upon three classes of criteria: a) construction worker hours, b) development of new non-tourism related projects or facilities and c) monies invested in or contributed to job training programs. **Credits are earned when approved by the. LUC**

Condition 1, as amended, provides the following requirements for earning job credits:

1. *Petitioner¹ shall generate one (1) non-tourism related job, or the equivalent value thereof, for each hotel or hotel/condominium unit Petitioner is allowed to build. As used herein, "non-tourism related" means not related to hotels or residential condominiums intended for use as transient accommodations, or recreational, entertainment or other facilities and services used primarily by tourists. The "equivalent value" of a non-tourism related job is in the range of \$25,000 to \$50,000.*

Satisfaction of this condition shall occur at the time Petitioner obtains a building permit and may be accomplished by the payment of \$25,000 for each hotel or hotel/condominium unit intended for transient accommodation for which a building permit is issued or in the following manner (provided that, with respect to subparagraphs a. and b., below, Petitioner may not apply any credit accrued and earned under both subparagraphs for the same facility to satisfy this condition):

a. *Jobs Generated Via Construction.*

Development of residential, commercial, industrial, recreational, institutional or other non-tourism related facilities generates construction jobs not related to tourism. Petitioner, therefore, directly or through local affiliates, may receive one job credit for each 25 man-years of labor generated by a qualified project, which may be either within or outside of the Petition Area. (Hereafter, Petitioner and/or its affiliates shall collectively be referred to as "Developer".) One man-year shall equal 1920 hours of work; labor generated by the construction of a project shall

² As used herein, the term "Petitioner" means Haseko (Hawaii), Inc. and its successors and assigns.

include all work performed by the Developer's team (architects, engineers, consultants, contractors and subcontractors) in the development and construction of a non-tourism related project.

Not more than 25% of Petitioner's total job-generation requirement may be satisfied in this manner.

b. Jobs Generated Via Development of Non-Tourism Related Projects.

New facilities provide the means and opportunity for the establishment and/or growth of businesses and the generation of new, non-tourism related jobs. Petitioner, therefore, may receive credit for the development of new non-tourism related projects or facilities, either within or outside of the Petition Area. Credit for jobs created by such new facilities will be calculated on the basis of the degree of integration of the intended use of the facility with the tourist industry. Credit for one (1) non-tourism related job shall be given for the specified amount of floor space in the following types of facilities:

Type of facility	Floor Space (square feet)	Credit
Office	200	100 %
Warehousing/Storage	1,000	100 %
Manufacturing	300	100 %
Research facility (e.g. High-Tech)	150	100 %
Recreation and Other Activity Centers	1,000	100 %
Private Schools and Day-Care Centers	300	100 %
Agricultural Facility (e.g. Greenhouses and Processing Plants)	1,000	100 %

Retailing

300

60 %

Credit for other types of facilities will be determined on a case-by-case basis.

c. *Start-Up Capital, Business Incentives and Job Training.*

Petitioner may receive one (1) job credit for (i) each \$50,000 invested by Petitioner in a start-up of a non-tourism related business (by way of equity or investment into a loan fund for such business), (ii) each \$25,000 in incentives provided to a new, non-tourism related business, and/or (iii) each \$25,000 contributed in training programs for non-tourism related jobs. Petitioner shall consult with OSP to identify investments, incentives and training programs which qualify for credits under this category.

A minimum of 10% of Petitioner's job-generation requirement shall be satisfied in this manner.

d. *Earning Job Credits.*

Credits for jobs generated under subparagraphs a. through c., above, shall not be eligible for satisfaction of this condition unless, within two years after they accrue, they are reported to the LUC in Petitioner's annual report. Job credits shall be considered to have accrued under subparagraph a. when the Developer pays for the labor; under subparagraph b. when the certificate of occupancy is issued or such earlier date as may be approved by the LUC; and under subparagraph c. when the investment is made, the incentive is given, or the job training program is funded.

Petitioner's annual report to the LUC shall discuss in detail its progress in earning job credits. Additionally, Petitioner shall provide OSP with information concerning the manner in which Petitioner's claim for job credits is calculated as well as written certification by the Developer that all information provided is correct.

Job credits shall be considered earned only upon approval by the LUC. Petitioner may file a motion for approval of job credits with the LUC at such time as may be mutually agreeable between Petitioner and OSP, provided that said motion shall be filed prior to the Petitioner obtaining a building permit for the construction of hotel or hotel/condominium units to which the job credits will be applied.

At the time Petitioner obtains a building permit, Petitioner shall satisfy this condition by depositing cash or posting a bond or a letter of credit, in a form satisfactory to OSP, in an amount equal to the product of \$25,000 multiplied by the number of hotel or hotel/condominium units for which a building permit is issued, less any job credits previously earned. As job credits are earned and applied in satisfaction of this condition, Petitioner may submit a motion to the LUC for the refund of the funds paid to OSP or a reduction of the bond or letter of credit issued in favor of OSP. Five (5) years after the date the building permit is issued, OSP shall have the right to retain cash or make claim on the bond or letter of credit in an amount equal to the product of \$25,000 multiplied by the number of hotel or hotel/condominium units for which the building permit is issued, less any job credits previously earned.

Prior to the expiration of the five-year period, Petitioner may seek an extension of time to satisfy its job-generation requirement. An extension may be granted upon such additional terms as may be appropriate, provided that Petitioner establishes substantial compliance with this condition and specifies the methods, means and time in which it intends to satisfy this condition.

Except for the limitations regarding subparagraphs a. and b. and the 10% minimum required by subparagraph c., Petitioner shall determine the manner in which the remainder of its job-generation requirement may be allocated.

All funds obtained by OSP under this condition shall be applied to any one or more of the programs specified in subparagraph c., above

.JOB CREDITS CALCULATIONS

SUMMARY OF PETITIONER'S REQUEST FOR APPROVAL OF JOB CREDITS

JOB CREDITS SUMMARY				
	Condition 1			TOTALS
	1.a.	1.b.	1.c.	
Job Credits Reported in Annual Reports:	378.45	229.06	136.76	744.28
Less: Construction Job Credits Max:	(140.95)			(140.95)
Less: Job Credits Previously Approved:	(1.37)		(1.10)	(2.47)
Less: Training Job Credits Withdrawn:			(28.10)	(28.10)
TOTAL JOB CREDITS SUBMITTED FOR APPROVAL:	236.13	229.06	107.56	572.75

The total job credits of 744.28 was reported to the LUC. Reductions due to maximum limits, credits previously approved, and credits withdrawn has resulted in this motion requesting approval of 572.75 total job credits.

The D&O provides three methods for Petitioner to obtain job credits under Condition 1 of the D&O:

- a. Jobs Generated Via Construction (“Construction Job Credits”);

(Petitioner is requesting approval of 236.13 Construction Job Credits, which represents the 237.50 maximum allowed, less the 1.37 credits previously approved in the 1994 Order.)

- b. Jobs Generated Via Development of Non-Tourism Related Projects (“Facility Job Credits”);

(Petitioner is requesting approval of 229.06 Facility Job Credits) .and

- c. Start-up Capital, Business Incentives and Job Training (“Training Job Credits”).

(Petitioner is requesting approval of 107.56 Training Job Credits, which represents the 136.76 Training Job Credits reported in Petitioner’s annual reports, less the 28.10 withdrawn credits and the 1.10 credits previously approved in the 1994 Order.)

SUMMARY OF MOTION FOR APPROVAL OF JOB CREDITS

Based upon the above, Petitioner is requesting approval of 572.75 Job Credits, which consists of 236.13 Construction Job Credits, 229.06 Facility Job Credits and 107.56 Training Job Credits. This request is for credits reported from 1991 through 2020.

If this request is granted, it will allow Petitioner to start building up to 575.75 hotel or hotel/condominium units

DOCKET RECORD

On September 20, 2022, the LUC received \$1000 filing fee and hard copies of Petitioner’s Motion to Approve Job Credits.

On September 21, 2022, the LUC received digital files of Petitioner’s Motion.

On October 17, 2022, the LUC received Petitioner’s 2022 Annual Report.

On November 18, 2022, the Commission received State Office of Planning and Sustainable Development’s (“OPSD”)’s response to Petitioner’s Motion, and comments from the City and County of Honolulu’s Department of Planning and Permitting.

On November 21, 2022, the Commission mailed the notice of agenda to the Parties, the Statewide, and Oahu email/ mailing lists.

SUMMARY OF THE PARTIES’ POSITIONS

PETITIONER'S MOTION – HASEKO

Petitioner HASEKO (EWA), INC., successor in interest to Haseko (Hawaii), Inc. (“Petitioner”), by and through its attorneys, MATSUBARA, KOTAKE & TABATA, respectfully moves the Land Use Commission, State of Hawaii (“LUC”), pursuant to § 15-15-70 of the Hawaii Administrative Rules for an order approving 572.75 Job Credits based on the reasons provided in its Petition.

OPSD

OPSD recommended approval of Petitioner’s Motion for Approval of Job Credits to partially satisfy Condition 1 of the 1994 Order.

OPSD concurred with the methodology used for calculating the job credits and acknowledged Petitioner’s proposed calculation of the recreational (golf course) job credits. OP also concurred with the detailed descriptions, calculations and accounting of the requested job credits and stated that should the LUC approve the job credits, that Petitioner be allowed to begin building up to 575.22 hotel or hotel/condominium units and that Petitioner could also accrue and request approval from the LUC for an additional 374.78 ($950 - (2.47 + 572.75)$) future job credits under Conditions 1b. and 1c. subject to any stated restrictions.

COUNTY

The Department of Planning and Permitting (“Department”) acknowledged Petitioner’s efforts to comply with Condition No. 1 of the Decision and Order via email and had no further comments of the Motion.

STAFF ANALYSIS AND SUMMARY

According to the LUC's Administrative Rules "*...if a motion requires consideration of facts not appearing of record, it shall be supported by affidavits or declarations.*" (§ 15-15-70(c), Hawai'i Administrative Rules (HAR)).

The current motion is asking for an Order Granting Approval of 572.75 Job Credits as described to satisfy Condition 1 of the Amended D&O of Docket No. A89-651..

As the Commission considers Petitioner's evidence of facts and events which occurred after the Decision and Order was signed in December 8, 1989 and amended in March 5, 1990, it should note how Petitioner's Exhibits 4, 5, 6, and 7 of the Motion support LUC rule § 15-15-94(b), HAR .

Under LUC rule § 15-15-94(b), HAR

"...for good cause shown, the commission may act to modify or delete any of the conditions imposed or modify the commission's order."

The Petitioner has reported the number of paid hours worked and credits calculated in Petitioner's annual reports to the LUC from 1991 to 2020. Petitioner has reported 378.45 Construction Job Credits for years 1991 through 2020. A breakdown of the Construction Job Credits per reporting year is provided in Exhibit "4"

Condition 1.a. of the D&O limits the number of Construction Job Credits to 25% of the total Job Credit requirement. Since the maximum number of hotel or hotel/condominium units Petitioner is allowed to construct is 950 units under the Unilateral Agreement, Petitioner may not earn more than 237.50 Construction Job Credits ($950 \times 25\% = 237.50$).

Per Exhibit "3", the 1994 Order approved 2.47 Job Credits, which included 1.37 Construction Job Credits for the year 1991.

Also, Petitioner is requesting approval of 236.13 Construction Job Credits, which represents the 237.50 maximum allowed, less the 1.37 credits previously approved in the 1994 Order. Petitioner has reported 229.06 Facility Job Credits accrued and reported in years 2004, 2006, 2008 and 2019. See Exhibit "4" and the Annual Reports dated December 8, 2005, October 3, 2007, October 15, 2009, and October 17, 2019 in Exhibit "5". The facilities built and occupied include the Ewa Pointe Marketplace, Seagull Schools preschool, the Hoakalei Country Club Golf Course, and the Hoakalei Country Club Clubhouse.

The Ewa Pointe Marketplace, Seagull Schools preschool, and Hoakalei Country Club Clubhouse, all of which are complete and operating, are calculated based on square footage and comprise 199.06 credits. (See, Exhibit "4").

The Hoakalei Country Club Golf Course, which is also operating, has created 30 actual new full time jobs and Petitioner is now seeking 30 Facility Job Credits for those 30 jobs. These 30 jobs were reported for the year 2008 in Petitioner's annual report dated October 15, 2009. See Exhibit "5". Petitioner believes this satisfies the intent of Condition 1.b. The alternative would be to calculate the Facility Job Credits for the golf course based on its classification as a recreational facility, but the 18-hole golf course would amount to thousands of credits based on the 1,000 square feet per credit formula. Petitioner believes that the more conservative approach based on actual full time jobs created is appropriate.

Finally, Petitioner has contributed over \$3.4 million towards job training to school organizations, community groups, and scholarship programs. These contributions were reported to the LUC in Petitioner's annual reports. At \$25,000 per credit, Petitioner has reported 136.76 Training Job Credits for years 1991 through 2020. See Exhibits "4" and "5". A summary of the contributions made for Training Job Credits was incorporated as Exhibit "6".

Petitioner subsequently reviewed the contributions that were paid and reported in Exhibit "5" and was unable to verify the job training or educational purposes of certain contributions. As such, Petitioner withdrew those contributions, which equated to 28.10 Training Job Credits as depicted in Exhibit "7", which is a list of all withdrawn contributions that were previously reported.

As shown in Exhibit "3", the 1994 Order approved 2.47 Job Credits, which included 1.10 Training Job Credits.

Petitioner is requesting approval of 107.56 Training Job Credits, which represents the 136.76 Training Job Credits reported in Petitioner's annual reports, less the 28.10 withdrawn credits and the 1.10 credits previously approved in the 1994 Order.

Condition 1.c. requires that at least 10% of the total Job Credit requirement be satisfied through Training Job Credits. Based on the 950 hotel and hotel/condominium limit under the Unilateral Agreement, Petitioner must provide at least 95 Training Job Credits ($950 \times 10\% = 950$). Petitioner's request for approval of 107.56 Training Job Credits satisfies this requirement.

If the LUC is inclined to approve the Motion for Approval of Job Credits, it would be in alignment with the positions of both OP and County with regards to Condition 1 and supported by the annual reports, facts and exhibits provided by Petitioner that chronicle the efforts made to comply with the condition and obtain the sought-after job credits.

Since the approval of the initial Petition and its 1994 amendment, Petitioner has proceeded with the design, engineering and construction of the Project. Subdivision and building plans for the project were prepared for and approved by the County with the resulting **deliveries of nearly 82% of the permitted proposed 4,850 housing units.** Petitioner was able to move forward to complete its proposed golf course in January 2009 with the completion of a permanent clubhouse to members in 2019. If the Commission were to grant the approval of job credits there is ample evidence to support its decision.

The Commission should also recognize OPSD's recommendation

OPSD supports the approval of the job credits to partially satisfy Condition 1 of the 1994 Order and concurs with Petitioner's summary of how the job credits were earned and calculated. Based on this, LUC staff agrees with this assessment.

Discussion

The Motion for Approval of Job Credits is being made by a Petitioner who has demonstrated diligent responsibility in attempting to meet the representations made to the Commission despite the adversities encountered after the initial 1990 Decision and Order was issued. The perseverance demonstrated to move forward on this project over the years is admirable and the job credit approval request is well justified for Condition 1.

OP's recommended adoption of job credits is in keeping with maintaining the integrity of the original Decision & Order language and keeps it intact with a minimal change.

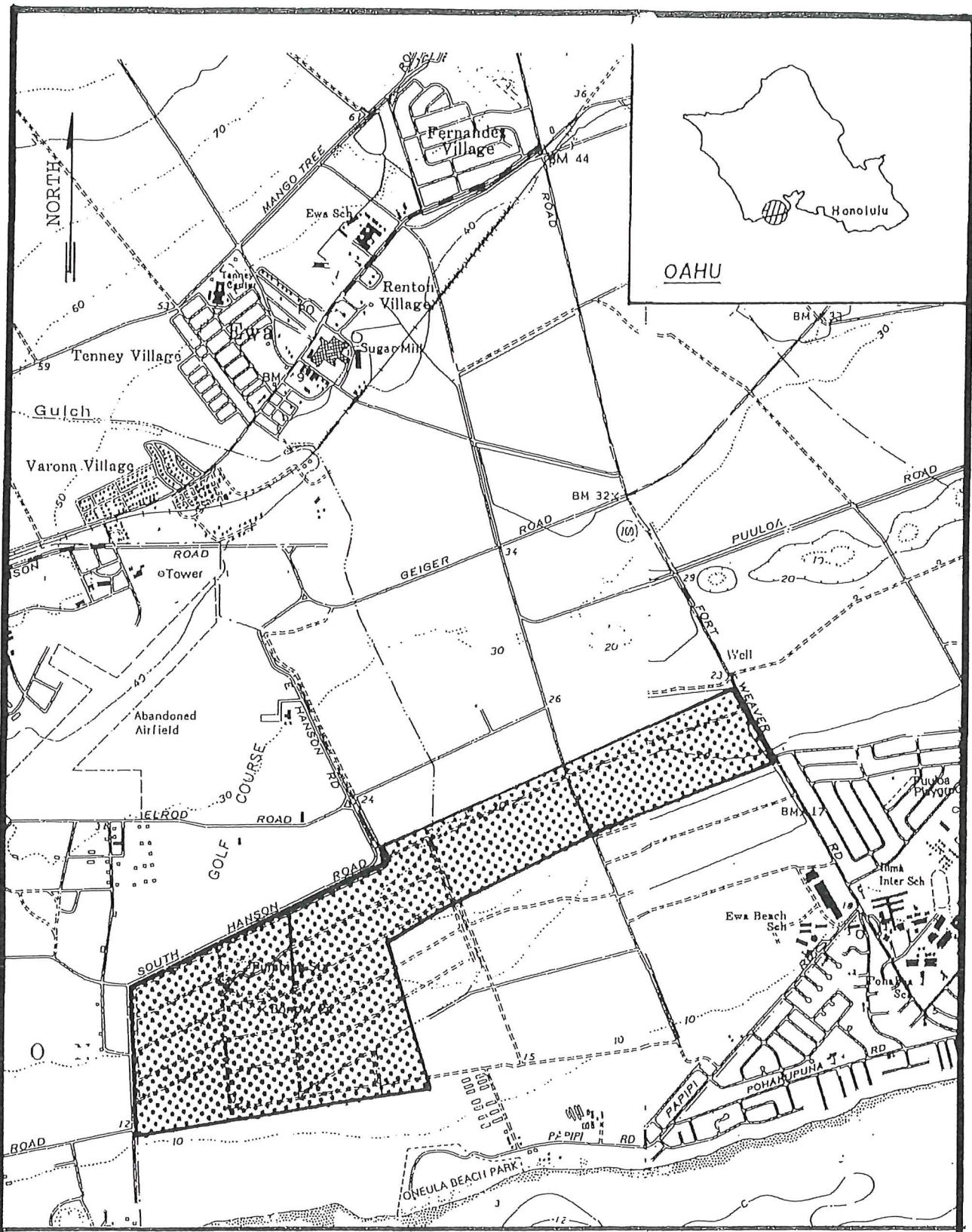
SUMMARY

The Commission has sufficient information to grant Petitioner's motion-to adopt job credits per Condition 1 as proposed by Petitioner, and that the LUC should note that granting the Motion would not affect any rights, remedies, or privileges of the Petitioner under existing law.

Proposed Motion language if LUC is inclined to approve:

“For the Good Cause shown by the Petitioner’s Documented Evidence of Earned Job Credits according to Condition 1 of the 1994 Decision and Order, I Move to grant Petitioner’s Motion to Approve Job Credits, noting that the Motion would not affect any rights, remedies, or privileges of the Petitioner under existing law and

- **Authorize LUC staff to make non-substantive changes to the conditions, as appropriate, regarding formatting, style, and other modifications to ensure consistency; and**
- **authorize the Chair to sign the Order in this matter on behalf of the Commission.”**



DOCKET NO. A89-651 / HASEKO (HAWAII), INC.

LOCATION MAP

T.M.K.: 9-1-12: por. 5, por. 6, por. 23

HONOULIULI, EWA OAHU, HAWAII



APPROVED AREA

SCALE: 1"=2,000 ft.±