

BEFORE THE LAND USE COMMISSION

OF THE STATE OF HAWAII

In the Matter of the Petition of)	DOCKET NO. A92-683
)	
HALEKUA DEVELOPMENT)	DECLARATION OF CURTIS T.
CORPORATION, a Hawai'i corporation))	TABATA
)	
To Amend the Agricultural Land Use)	
District Boundary into the Urban)	
Land Use District For Approximately)	
503.886 acres at Waikele and Hō'ae'ae,)	
'Ewa, O'ahu, City and County of)	
Honolulu, State of Hawai'i, Tax Map)	
Key No. 9-4-02: 01, portion of 52, 70 and)	
71)	
_____)	

DECLARATION OF CURTIS T. TABATA

CURTIS T. TABATA states as follows:

1. I am over 18 years of age, and I am one of the attorneys representing Haseko Royal Kunia, LLC ("Haseko"), the successor petitioner in the above-entitled matter. I have personal knowledge of the matters set forth in this Declaration, and, if called upon to testify, I could and would competently testify thereto.

2. A true and correct copy of the Petition Area map is attached to Haseko's Memorandum in Support of Motion re Haseko Royal Kunia, LLC's Motion for Order Amending the Memorandum of Understanding's Offsite Infrastructure Date in Condition A.1. ("Memorandum") as Exhibit "1".

3. A true and correct copy of Haseko's Annual Status Report dated October 4, 2023 is attached to the Memorandum as Exhibit "2".
4. A true and correct copy of Haseko's Revised Master Plan dated December 30, 2021 is attached to the Memorandum as Exhibit "3".
5. A true and correct copy of the Reconnaissance Level Survey for the Royal Kunia II Development Project is attached to the Memorandum as Exhibit "4".
6. A true and correct copy of the Archaeological Inventory Survey for the Royal Kunia II Development Residential Development Property is attached to the Memorandum as Exhibit "5".
7. A true and correct copy of Haseko's Revised Master Plan Phasing is attached to the Memorandum as Exhibit "6".
8. A true and correct copy of the Amended Order Granting Successor Petitioner (as to Parcel 52) Ho'Ohana Solar 1, LLC's Motion for Modification and Time Extension filed November 1, 2021 is attached to the Memorandum as Exhibit "7".
9. A true and correct copy of the July 5, 2023 letter from the Department of Agriculture to Haseko is attached to the Memorandum as Exhibit "8".
10. A true and correct copy of the Fifth Amendment to Amendment and Restatement of Memorandum of Understanding dated January 10, 2024 is attached to the Memorandum as Exhibit "9".

11. A true and correct copy of the Final Cultural Impact Assessment of Ho‘Ohana Solar Energy Facility, Waikele and Ho‘ae‘ae Ahupua‘a, Ewa District, Oahu Island, Hawai‘i is attached to the Memorandum as Exhibit “10”.

12. A true and correct copy of Haseko’s request for determination letter to the Department of Planning and Permitting (“DPP”) dated August 31, 2021 is attached to the Memorandum as Exhibit “11”.

13. A true and correct copy of DPP’s determination letter to Haseko dated September 24, 2021 is attached to the Memorandum as Exhibit “12”.

I declare under penalty of law that the foregoing is true and correct.

Executed this 15th day of February 2024.



CURTIS T. TABATA