

BENJAMIN M. MATSUBARA, #993-0
CURTIS T. TABATA, #5607-0
Matsubara, Kotake & Tabata
888 Mililani Street, Suite 308
Honolulu, Hawai'i 96813



Attorneys for
HASEKO ROYAL KUNIA, LLC

BEFORE THE LAND USE COMMISSION
OF THE STATE OF HAWAII

In the Matter of the Petition of)	DOCKET NO. A92-683
)	
HALEKUA DEVELOPMENT)	HASEKO ROYAL KUNIA, LLC'S
CORPORATION, a Hawai'i corporation))	SUPPLEMENTAL MEMORANDUM IN
)	SUPPORT OF ITS 2025 MOTION FOR
To Amend the Agricultural Land Use)	ORDER AMENDING THE
District Boundary into the Urban)	MEMORANDUM OF
Land Use District For Approximately)	UNDERSTANDING'S OFFSITE
503.886 acres at Waikele and Hō'ae'ae,)	INFRASTRUCTURE DATE IN
'Ewa, O'ahu, City and County of)	CONDITION A.1; EXHIBITS "7"-"9";
Honolulu, State of Hawai'i, Tax Map)	DECLARATION OF CURTIS T.
Key No. 9-4-02: 01, portion of 52, 70 and)	TABATA; CERTIFICATE OF
71)	SERVICE
_____))	

HASEKO ROYAL KUNIA, LLC'S SUPPLEMENTAL MEMORANDUM IN SUPPORT OF ITS 2025 MOTION FOR ORDER AMENDING THE MEMORANDUM OF UNDERSTANDING'S OFFSITE INFRASTRUCTURE DATE IN CONDITION A.1.

Comes now, HASEKO ROYAL KUNIA, LLC ("Petitioner" or "Haseko"), by and through its attorneys MATSUBARA, KOTAKE & TABATA, respectfully submits its Supplemental Memorandum in Support of its 2025 Motion for Order Amending the Memorandum of Understanding's Offsite Infrastructure Date in Condition A.1.

Attached hereto as Exhibit "7" are photographs of the completed temporary potable waterline that provides potable water to the Department of Agriculture & Biosecurity ("DAB") property line at Royal Kunia Agricultural Park ("Agricultural Park"). The waterline is comprised of a 2" conduit that is attached to a temporary Board of Water Supply ("BWS") water meter mounted on an existing fire hydrant, a 3" waterline running along Haseko's property line adjacent to the solar farm access road, and a capped 2" PVC conduit stubout for future DAB connection at the southern end of the Agricultural Park. This temporary potable waterline is one of two temporary utilities that Haseko is required to provide up to the DAB property line at the Agricultural Park pursuant to the Sixth Amendment to Amendment and Restatement of Memorandum of Understanding ("6th Am MOU") between DAB and Haseko. The other temporary utility is the temporary functional electrical power.

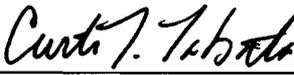
Attached hereto as Exhibit "8" is the electrical plan and photograph of the location for the future temporary functional electrical power that will cross Kunia Road and provide power up to the DAB property line at the Agricultural Park.

Attached hereto as Exhibit "9" are the photographs of the pump equipment for the non-potable irrigation system, Hawaiian Electric Company ("HECO") electric meter, and HECO transformers with 3" secondary conduit to pump equipment for the DAB Agricultural Park. The irrigation infrastructure was completed and accepted by DAB

on October 1, 2025. The irrigation waterline was built by Ho‘Ohana Solar, and Haseko built the pump equipment.

DATED: Honolulu, Hawai‘i, February 24, 2026.

Of Counsel:
MATSUBARA, KOTAKE & TABATA
A Law Corporation



BENJAMIN M. MATSUBARA
CURTIS T. TABATA
Attorneys for
HASEKO ROYAL KUNIA, LLC

Plan view of Route 3" Temporary Potable Waterline from Existing Fire Hydrant #L5420 at Anonui Street to DAB Property Line

Temporary Waterline to DoA

Exhibit "7"



EXHIBIT "7"

2" PVC Conduit Connection to BWS Temporary Water Meter #20910002 Mounted on Existing Fire Hydrant

#L5420



3" Temporary Potable Waterline Running Along Perimeter of Haseko Royal Kunia's Property Line
Adjacent to Solar Farm Access Road and Temporary Lateral to Solar Farm at an Existing Connection



3" Temporary Potable Waterline at Tee and Lateral to Royal Contracting's Temporary Water Basin Used to Draw Water for Dust Control





Terminus of 3" Temporary Potable Water Line with Valve and Transition to a Capped 2" PVC Conduit Stubout for Future DAB Connection



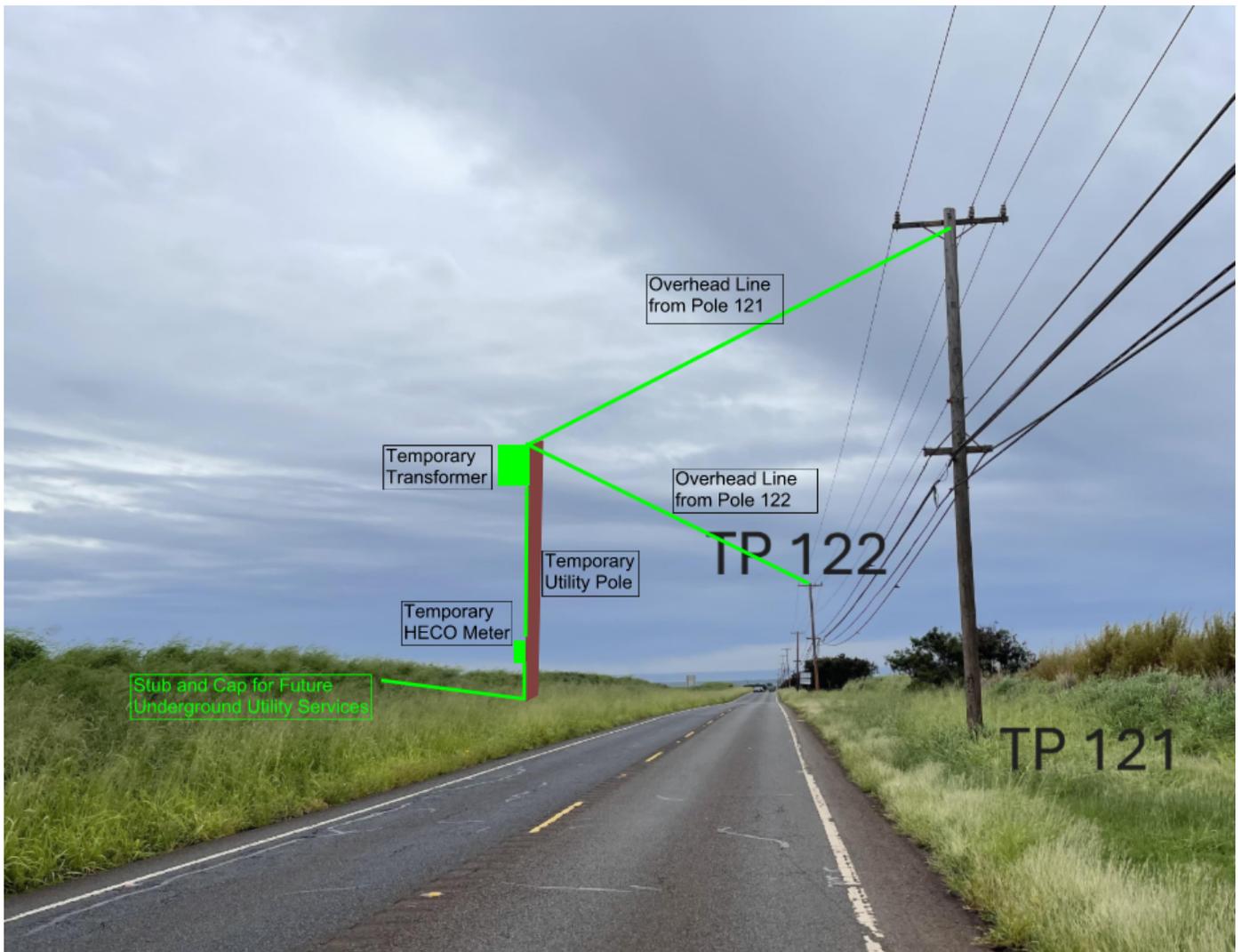
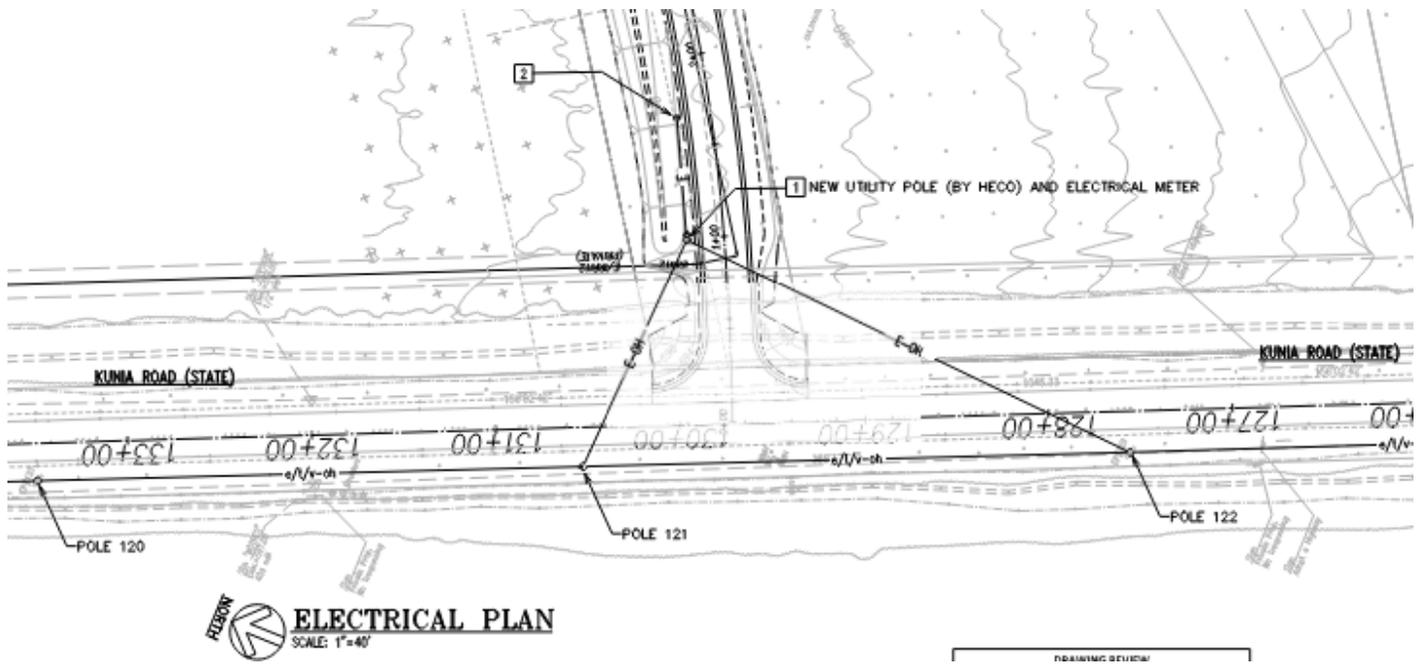


Exhibit 8 - Temporary Power at Road A Entry to Agricultural Park at Kunia Road Intersection



Exhibit 9 Photo #1 - Non-Potable Irrigation System
Pump Equipment at the 665' Reservoir Site



Exhibit 9 Photo #2 - Non-Potable Irrigation System
HECO Electric Meter #976086



Exhibit 9 Photo #3 - HECO Transformers at Existing Pole #4/113X with 3" Secondary Conduit to Pump Equipment

BEFORE THE LAND USE COMMISSION

OF THE STATE OF HAWAI'I

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 photographs of the completed temporary potable waterline that provides potable water to the Department of Agriculture & Biosecurity ("DAB") property line at Royal Kunia Agricultural Park ("Agricultural Park") is attached to Haseko's Supplemental Memorandum in Support of its 2025

Motion for Order Amending the Memorandum of Understanding's Offsite

Infrastructure Date in Condition A.1. ("Supplemental Memorandum") as Exhibit "7".

3. A true and correct copy of the electrical plan and photograph of the location for the temporary functional electrical power that will cross Kunia Road and provide power up to the DAB property line at the Agricultural Park is attached to the Supplemental Memorandum as Exhibit "8".

4. A true and correct copy of the photographs of the pump equipment for the non-potable irrigation system, Hawaiian Electric Company ("HECO") electric meter, and HECO transformers with 3" secondary conduit to pump equipment for the DAB Agricultural Park is attached to the Supplemental Memorandum as Exhibit "9".

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

Executed this 24th day of February, 2026.



CURTIS T. TABATA

BEFORE THE LAND USE COMMISSION

OF THE STATE OF HAWAI'I

In the Matter of the Petition of)	DOCKET NO. A92-683
)	
HALEKUA DEVELOPMENT)	CERTIFICATE OF SERVICE
CORPORATION, a Hawai'i corporation))	
)	
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)	
_____)	

CERTIFICATE OF SERVICE

I hereby certify that an e-stamped copy of the foregoing document was duly served upon the following **AS INDICATED BELOW** on February 24, 2026.

MARY ALICE EVANS, DIRECTOR	HAND-DELIVERY
RUBY M. EDWARDS	
AARON H. SETOGAWA	
Office of Planning and Sustainable Development, State of Hawai'i	
235 South Beretania Street, Room 600	
Honolulu, HI 96813	

ALISON S. KATO, ESQ.	HAND-DELIVERY
Deputy Attorney General	
Department of the Attorney General, State of Hawai'i	
425 Queen Street	
Honolulu, HI 96813	

DAWN TAKEUCHI-APUNA, DIRECTOR
DINA WONG
FRANZ KRAINTZ
Department of Planning and Permitting
City and County of Honolulu
650 South King Street, 7th Floor
Honolulu, HI 96813

HAND-DELIVERY

BRAD TAMIO SATO, ESQ.
PONO ARIAS, ESQ.
Deputy Corporation Counsel
Department of Corporation Counsel
City and County of Honolulu
1001 Bishop Street, Suite 2020
Honolulu, HI 96813

HAND-DELIVERY

ROBINSON KUNIA LAND LLC
c/o RUSH MOORE LLP
ATTN: STEPHEN K.C. MAU, ESQ.
745 Fort Street, Suite 800
Honolulu, HI 96813

HAND-DELIVERY

RK II PARTNERS LLC
c/o SCHLACK ITO
ATTN: DEREK R. KOBAYASHI, ESQ.
BRITTNEY M. WU, ESQ.
745 Fort Street, Suite 1500
Honolulu, HI 96813

HAND-DELIVERY

JUPITER HOLDINGS LLC
ATTN: MR. NORMAN I. TATCH
24 Corporate Plaza, Suite 100
Newport Beach, CA 92660

U.S. CERTIFIED MAIL
RETURN RECEIPT
REQUESTED

HOOHANA SOLAR 1, LLC
ATTN: JENNIFER A. LIM, ESQ.
Law Office of Jennifer A. Lim LLLC
2299 B Round Top Drive
Honolulu, HI 96822

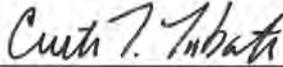
U.S. CERTIFIED MAIL
RETURN RECEIPT
REQUESTED

RKES, LLC
ATTN: PATRICK K. KOBAYASHI
1288 Ala Moana Boulevard, Suite 201
Honolulu, HI 96814

U.S. CERTIFIED MAIL
RETURN RECEIPT
REQUESTED

DATED: Honolulu, Hawai'i, February 24, 2026.

Of Counsel:
MATSUBARA, KOTAKE & TABATA
A Law Corporation



BENJAMIN M. MATSUBARA
CURTIS T. TABATA
Attorneys for
HASEKO ROYAL KUNIA, LLC