



HASEKO ROYAL KUNIA, LLC



February 27, 2026

Dawn Takeuchi Apuna, Director
ATTN: Franz Kraintz
Department of Planning and Permitting
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

Re: Haseko Royal Kunia, LLC's (Haseko) Response to DPP's Response to the 2025 Royal Kunia II Compliance with Conditions for Amended Decision and Order Docket No. A92-683, Annual Status Report

Dear Director Apuna,

This letter is submitted in response to the DPP's review comments regarding compliance with the conditions imposed under the LUC Amended Decision and Order Docket No. A92-683. The following provides Haseko's responses to each condition, including clarifications to the annual status report, updates on ongoing coordination efforts, and references to supporting documentation provided as exhibits where applicable.

Haseko appreciates the DPP's review and guidance and remains committed to working collaboratively with the DPP, the Land Use Commission, and other applicable City and State agencies to ensure continued compliance with the conditions of the LUC Decision and Order. The responses below are intended to address the DPP's comments and requests, and to demonstrate Haseko's ongoing efforts to responsibly advance the project while meeting all applicable requirements.

Condition No. 1 – Affordable Housing

Condition No. 1 directs the Petitioner to provide an affordable housing contribution to the satisfaction of the City.

DPP Response: The Annual Status Report should have stated that DPP provided a Final Draft (dated January 24, 2024) to the Petitioner on January 27, 2024, and that a meeting to discuss outstanding items was to follow. Petitioner responded on February 16, 2024, and was to provide comments on the Final Draft. DPP has yet to receive comments or proposed revisions.

Haseko Response: The next annual report will reflect these updates for the 2026 annual report. Haseko will make reasonable progress to finalize an agreement prior to applying for building permits.

Condition No. 2 – Transportation Improvements

To comply with Condition No. 2, the Petitioner must participate in and fund improvements to off-site regional transportation infrastructure, including widening Kunia Road to four lanes between the Cane Haul Road intersection and the northernmost boundary of Royal Kunia Phase II, plus necessary highway right-of-way and interchange improvements.

DPP Response: The DPP awaits the submission of the finalized design plans and a revised Traffic Impact Analysis Report (TIAR) that covers a full build-out of the development. Please notify both the Traffic Review Branch and Planning Division when complete.

Haseko Response: Haseko has received approval by DOT and DTS for the TIAR through the full build-out of the residential development and has also reviewed the school lot's and the agricultural park's TIAR's. A subsequent and revised TIAR for the full build-out of the development will be submitted to DOT and DTS once the industrial parcel owner provides their approved TIAR for the entire industrial and commercial property inclusive of all phases and through full build-out. Traffic Review Branch and Planning Division will be notified when complete.

Condition No. 3 – Regional Transportation Management Program

According to Condition No. 3, the Petitioner shall either appoint a permanent transportation manager or participate in a regional transportation management program as received and approved by the State Department of Transportation (DOT).

DPP Response: The DPP requests confirmation in writing from the State DOT that this program is no longer in effect and that yearly evaluation and report of the program's effectiveness have been suspended either partially or in full.

Haseko Response: Haseko has submitted a written request to the State DOT to confirm the status of the program and whether the yearly evaluation and reporting requirements have been suspended, shown as Exhibit A. Haseko will forward the State DOT's response to DPP once it is received.

Condition No. 4 – Traffic Monitoring

Condition No. 4 states that the Petitioner shall monitor traffic impacts attributable to the Project and implement mitigation measures if needed.

DPP Response: The DPP awaits submittal of the TIAR that covers the development including the industrial parcel inclusive of all phases through full build-out. Please notify both the Traffic Review Branch and Planning Division when complete.

Haseko Response: Haseko has received approval by DOT and DTS for the TIAR through the full build-out of the residential development and has also reviewed the school site's and agricultural park's TIAR's. A subsequent and revised TIAR for the full build-out of the development will be submitted to DOT and DTS once the industrial parcel owner provides their approved TIAR for the entire industrial and commercial property inclusive of all phases and through full build-out. Traffic Review Branch and Planning Division will be notified when complete.

Condition No. 5 – Integrated Solid Waste Management Act

Pursuant to Condition No. 5, the Petitioner shall cooperate with the State Department of Health (DOH), and the City Department of Environmental Services (ENV) (formally Department of Public Works) to manage solid waste generated by the development.

DPP Response: Please provide a copy of ENV's preliminary approval of the first cluster housing project eligible for the Automated Cart Collection Program.

Haseko Response: Haseko has coordinated with the ENV regarding the eligibility of the first cluster housing project for the City's Automated Cart Collection Program. DES has reviewed the proposed plans, and as part of these discussions, CPR lots located at the end of short dead-end areas will bring their carts to designated collection points along an adjacent roadway or driveway for service. Haseko is designing its residential projects to meet the requirements for participation in this program and will provide final ENV approval for Haseko's first cluster housing project.

Condition No. 6 – School Facilities

Per Condition No. 6, the Petitioner shall contribute to the development, funding and/or construction of school facilities as a result of the development on the Property, to the satisfaction of the State Department of Education.

DPP Response: The DPP requests a copy of the School Site Agreement, including a copy of the warranty deed of the conveyed 12-acre school site.

Haseko Response: Please see Exhibit B, which shows the Royal Kunia II DOE School Site Agreement dated March 6, 2007.

Condition No. 7 – Water Requirements

In accordance to Condition No. 7, the Petitioner shall coordinate with the Honolulu Board of Water Supply and the State Department of Land and Natural Resources to obtain water required for the Project.

DPP Response: The DPP has obtained a copy of the approved Royal Kunia Phase II Water Master Plan Update dated June 6, 2024.

Condition No. 8 – Civil Defense Measures

Condition No. 8 states that the Petitioner shall participate in the funding for construction and installation of appropriate civil defense measures as determined by State and City civil defense agencies.

DPP Response: The DPP acknowledges the efforts by the Petitioner to reach an agreement with the Hawai'i Emergency Management Agency to fund, install, and convey a civil defense siren within Royal Kunia Phase II. Once consummated, please include a copy of said agreement in future annual reports.

Haseko Response: Once the agreement with HiEMA is finalized, Haseko will be sure to include a copy of the agreement in future annual reports.

Condition No. 9 – Chain Link Fence

Condition No. 9 states the Petitioner shall erect a chain link fence along the eastern boundary of the Property.

DPP Response: The response in the annual report states there was no common boundary with the land formally owned by the Waikele Branch of the Naval Magazine. Please provide an exhibit or other documentation to show that the two properties do not have a common boundary.

Haseko Response: Please see Exhibit C that shows the ownership of parcels within Royal Kunia 2 LUC Petition Area. Shown in green, Robinson Kunia Land LLC, who leased the land to Ho'Ohana Solar 1, LLC, owns the parcel with the eastern boundary of the Property and that abut the land formally owned by the Waikele Branch of the Naval Magazine (nka Waikele Storage Park). Halekua Development Corporation, Haseko's predecessor, never acquired this land on which this fence and cleared area would be located, and the title is still held by Robinson Kunia Land LLC. Future erection of a fence and maintenance of clear areas along this boundary should be the responsibility of any future developer of the land owned by Robinson Kunia Land LLC.

Condition No. 10 – Clearance and Maintenance of Land

Condition No. 10 states the Petitioner shall clear and maintain the land situated within 20 feet of the eastern boundary of the Property.

DPP Response: See the DPP response to Condition No. 9.

Haseko Response: See Haseko's response to Condition No. 9.

Condition No. 11 – Pollutants

To comply with Condition No. 11, the Petitioner shall coordinate with the DOH and the ENV to establish appropriate systems to contain spills and prevent materials from leaching into storm drainage and affecting ground and coastal waters.

DPP Response: If an approved plan and program were not initiated as required by Condition No. 11, then please provide what pollution control systems were revised and approved for the cluster housing permitted under 2022/CL-2.

Haseko Response: The design work for the residential area covered by the cluster permit in Parcel D is currently in progress. However, the new infrastructure roadways surrounding Parcel D, including Anonui Street Extension Increment 1, Road X Phase 1, and Road 3, all include interim drainage measures as part of their respective projects. The interim and permanent pollution control systems were reviewed and approved by DPP during the permitting process for these three construction plan sets.

Condition No. 12 – Wastewater Treatment

Pursuant to Condition No. 12, the Petitioner shall participate in a pro rata basis in the funding and construction of adequate wastewater treatment, transmission, and disposal facilities, as determined by the DOH and the ENV.

DPP Response: The DPP requests a copy of the June 2021 updated wastewater master plan.

Haseko Response: We have attached the June 2021 updated wastewater master plan as Exhibit D. In addition, we have attached the January 2024 updated wastewater master plan that was approved by DPP on November 19, 2024 as Exhibit E. Future annual reports will include this updated wastewater master plan.

Condition No. 13 – Soil Erosion and Dust Control

Per Condition No. 13, the Petitioner shall implement effective soil erosion and dust control measures, both during and after construction.

DPP Response: The DPP will ensure that effective soil erosion and dust control measures are in place in order to approve the grading permit for actual construction of the Project.

Haseko Response: Effective soil erosion and dust control measures are incorporated into the approved plans for Anonui Street Extension Increment 1, Road X Phase 1, and Road 3, each of which has an active grading permit.

Condition No. 14 – Air Quality Monitoring

In accordance with Condition No. 14, the Petitioner shall participate in an air quality monitoring program as specified by the DOH.

DPP Response: Please be sure to establish an air monitoring program as specified by the DOH prior to construction under 2022/CL-2.

Haseko Response: Haseko will comply with this condition prior to construction under Cluster Permit 2022/CL-2.

Condition No. 15 – Agricultural District Pollution

Condition No. 15 requires the Petitioner to provide notifications to all owners and occupants of the Project of the potential odors, noise, and dust pollution resulting from neighboring Agricultural District lands.

DPP Response: Unless housing is currently under construction and for sale, the DPP acknowledges such notifications will occur at that time.

Condition No. 16 – Drainage Improvements

Under the provisions of Condition No. 16, the Petitioner shall provide drainage improvements for the Project and shall coordinate off-site improvements with adjoining landowners, developers, and other government agencies.

DPP Response: The DPP has obtained a copy of the updated drainage master plan and Supplemental Drainage calculations for Storm Flow Routing Evaluation of the Royal Kunia Country Club golf course.

Condition No. 17 – Archaeological Resources

As set forth in Condition No. 17, the Petitioner shall immediately stop work should any archaeological resources such as artifacts, shell, bones, charcoal deposits, human burials, or rock or coral alignments, paving or walls of historic or prehistoric significance be encountered.

DPP Response: The DPP requests copies of the State Historic Preservation Division's (SHPD) acceptance of the Archeological Inventory Survey (AIS) testing strategy as well as copies of the AIS and Reconnaissance Level Survey submitted to the SHPD.

Haseko Response: In the exhibits below, we have attached the copies of SHPD's acceptance of the AIS testing strategy dated January 4, 2024 (Exhibit F), the submitted AIS dated November 21, 2024 (Exhibit G) and the submitted Reconnaissance Level Survey dated September 9, 2024 (Exhibit H).

Condition No. 18 – Development Plan Approvals

According to Condition No. 18, the Petitioner shall obtain Development Plan approvals from the City within five years from the date of the LUC Decision and Order.

DPP Response: Since the adoption of the Central O'ahu Sustainable Communities Plan (COSCP) on December 20, 2002 by Ordinance 02-62, Condition No. 18 as part of the

October 1, 1996 Amended Findings of Fact, Conclusions of Law, and Decision and Order approved by the LUC has been met albeit beyond the five years due to additional time needed by the DPP to undertake the transformation through standardization of the Development Plan and Sustainable Communities Plans at that time.

Haseko Response: Since acquiring ownership of Royal Kunia II in August 2020, Haseko has been working on its overall plans for its Lands.

Condition No. 19 – Agricultural Park

The Petitioner and the State Department of Agriculture consummated a Fifth Memorandum of Understanding (MOU) to develop the agricultural park at Royal Kunia, Phase II on October 7, 2024. This outlined a schedule for infrastructure implementation and provided for other compliance requirements.

DPP Response: Since the Fifth MOU was executed, the irrigation infrastructure was to be completed by December 31, 2025. Please provide a progress report as to its completion and estimate as to when it will be completed.

Haseko Response: The Irrigation Infrastructure for non-potable irrigation water comprised of water line and pump station that delivered non-potable irrigation water to the Department of Agriculture and Biosecurity (DAB)'s property. The Irrigation Infrastructure was substantially completed by August 31, 2024, as required by the Fifth MOU. DAB accepted the Irrigation Infrastructure improvements on October 1, 2025.

In addition to the Irrigation Infrastructure requirement, the Fifth MOU required Haseko to provide the Temporary Infrastructure by December 31, 2025. Temporary Infrastructure included providing both functional electrical power and potable water to the DAB property.

In discussions with Hawaiian Electric Company (HECO), HECO will not allow the construction of temporary electrical power lines until there is an end user at DAB's Agricultural Park. As the Agricultural Park has not been constructed, there is no end user for the temporary park and the temporary electrical power lines cannot be installed according to HECO. The drawings and plans for the temporary electrical power lines have been reviewed and approved by HECO; therefore, the temporary electrical power lines will be constructed as soon as there is an end user in place prior to the completion of the Permanent Infrastructure.

To address this conflict for the temporary electrical power, Haseko and DAB have consummated a Sixth Amendment to Amendment and Restatement of Memorandum of Understanding dated December 17, 2025 (Sixth MOU). Under the 6th Am MOU, Haseko will provide Temporary Infrastructure by the following deadlines:

- 1) potable water by December 31, 2025; and

- 2) functional electrical power by the date the DAB has an end user in place, which date shall not exceed September 30, 2028 when the Permanent Infrastructure is to be delivered.

The temporary potable water line was scheduled to be completed by December 31, 2025, but due to weather conditions, completion of the temporary potable water was delayed to Jan 14, 2026. On Jan 15, 2026, DAB acknowledged the completion of the temporary potable water line.

Haseko will continue to be committed to fulfilling the obligations to DAB under the Sixth MOU.

Condition No. 20 – Compliance with Representations

Condition No. 20 states the Petitioner shall develop the Property in substantial compliance with the representations made to the LUC.

DPP Response: The DPP acknowledges the Petitioner's intent to substantially comply with the representations made to the LUC to develop the Property.

Haseko Response: As stated within Haseko's annual report, Haseko fully intends to continue to fulfill the requirement to develop the Haseko-owned portions of RKII in substantial compliance with representations made by its predecessors in interest to the LUC.

Condition No. 21 – Transfer of Petitioner's Interest in the Property

Per Condition No. 21, the Petitioner shall provide notice to the LUC of any intent to sell, lease, assign, place in trust, or alter ownership interest.

DPP Response: Approximately 15 months ago, a published newspaper article suggested the State Department of Hawaiian Home Lands (DHHL) was interested in purchasing some or all of the property. Could you please provide an update on plans by the DHHL to acquire lands from Haseko.

Haseko Response: Haseko is still in intermittent discussions with the State Department of Hawaiian Home Lands, but Haseko has not sold, leased, placed in trust or altered ownership interest within the Royal Kunia II development.

Condition No. 22 – Annual Reports

To comply with Condition No. 22, the Petitioner shall promptly provide annual reports to the LUC, the State Office of Planning and Sustainable Development, and the DPP in connection with the status of the Project and the Petitioner's progress in compliance with the conditions imposed.

DPP Response: The DPP acknowledges receipt of annual reports provided by the Petitioner.

Haseko Response: Compliant with Condition No. 22, Haseko has provided annual reports all three government agencies (the State Land Use Committee, State Office of Planning and Sustainable Development and the City Department of Planning and Permitting.)

Condition No. 23 – Release of Conditions

Per Condition No. 23, the LUC may partially or fully release the conditions provided “upon the provision of adequate assurance of satisfaction of these conditions by Petitioner”.

DPP Request: By submitting the requested documentation in the annual reports, the Petitioner is providing adequate assurance that these conditions will be satisfied.

Haseko Response: At the time when Haseko intends to seek Release of Conditions under LUC Docket No. A92-683, Haseko will provide adequate assurance that these conditions will be satisfied.

Condition No. 24 – Recording of Statement Regarding the Property Subject to Conditions

Within seven days of the LUC’s Decision and Order, the Petitioner shall record with the Bureau of Conveyances, a statement to the affect that the Property is subject to conditions imposed by the LUC and shall file a copy of such recorded statement with the LUC.

DPP Response: The DPP requests a copy of the recorded statement filed with the Bureau of Conveyances, indicating that the Property is subject to the conditions imposed by the LUC.

Haseko Response: We attached the file as EXHIBIT I.

Condition No. 25 – Recording of Conditions

The Petitioner shall record the conditions imposed by the LUC with the Bureau of Conveyances pursuant to Hawai‘i Administrative Rules (HAR), Section 15-15-92.

DPP Response: The DPP requests a copy of the recorded instrument filed with the Bureau of Conveyances pursuant to HAR Section, 15-15-92, listing all conditions imposed by the LUC.

Haseko Response: We attached the file as EXHIBIT J.

Haseko appreciates the DPP’s continued coordination and thoughtful review of the annual status report and related compliance materials. We believe the information provided herein and in the referenced exhibits responds to the DPP’s comments and requests. Haseko remains committed to maintaining open communication and continued coordination with the DPP and other reviewing agencies as the project progresses.

Director Dawn Takeuchi Apuna
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If you have any questions or require further information, please feel free to call me at (808) 689-7772. We look forward to continued collaboration with the DPP in support of the orderly and responsible development of Royal Kunia Phase II.

Sincerely,

HASEKO ROYAL KUNIA, LLC,

By Haseko Development, Inc.
Its Manager

By 
Masayuki Narahara
Its President

Attachments:

- Exhibit A – Letter to DOT Confirming the Existence of the Regional Transportation Management Program
- Exhibit B – Royal Kunia II DOE School Site Agreement dated March 6, 2007
- Exhibit C – Royal Kunia 2 LUC Docket A92-683 Petition Area Map
- Exhibit D – Royal Kunia Wastewater Master Plan dated June 2021
- Exhibit E – Royal Kunia Wastewater Master Plan dated January 2024 and approved by DPP on November 19, 2024
- Exhibit F – SPHD’s Acceptance of the AIS Testing Strategy dated January 4, 2024
- Exhibit G – Submitted AIS dated November 21, 2024
- Exhibit H – Submitted Reconnaissance Level Survey dated September 9, 2024
- Exhibit I – Declaration of Conditions Imposed by the State Land Use Commission - State of Hawaii Bureau of Conveyances Recorded on March 30, 2015
- Exhibit J – Declaration of First Amendment to the Amend Findings of Fact, Conclusions of Law, and Decision and Order Filed on October 1, 1996 (filed October 7, 2013) – State of Hawaii Bureau of Conveyances Recorded on June 20, 2014

cc with enclosures:

Matsubara, Kotake & Tabata