JOSH GREEN, M.D.
Governor

SYLVIA LUKE
Lt. Governor

SHARON HURD
Chairperson
Board of Agriculture & Biosecurity

DEAN M. MATSUKAWA
Deputy to the Chairperson

State of Hawai'i
DEPARTMENT OF AGRICULTURE & BIOSECURITY
KA 'OIHANA MAHI'AI A KIA'I MEAOLA
1428 South King Street
Honolulu, Hawai'i 96814-2512
Phone: (808) 973-9560 FAX: (808) 973-9613

May 8, 2026

Mr. Dan Orodenker
Executive Officer
Land Use Commission
235 South Beretania Street, Suite 406
Honolulu, Hawaii 96813

Dear Mr. Orodenker:

Subject: Special Permit Application (SP-2026-4)
Kaawanui Solar Project
Kaawanui Solar, LLC
Robinson Family Partners (lessee: Gay & Robinson, Inc.)
TMK: (4) 1-7-006: 006 (por.) and 010 (por.)
Area: 269.195 acres
Makaweli, Kauai

The Department of Agriculture and Biosecurity (Department) has reviewed the subject application (as comprised in Exhibit 25 of the Land Use Commission's List of Exhibits) and offers the following comments and recommendations.

Background
Kaawanui Solar/AES Clean Energy Development Company (Applicant) is proposing the development of a 52-megawatt (DC) capacity photovoltaic solar energy facility, a 172 megawatt-hour battery storage system, and related appurtenances at the 269.195-acre project site located about 2 miles southeast of Waimea town. The project site's southwestern boundary runs along Kaumualii Highway, and the northeastern boundary abuts Kaawanui village.

The project site is entirely within the State Agricultural District, the County General Plan designation is Agricultural, and County zoning is Agricultural with some Open Space along Kaawanui Gulch situated along the southeastern boundary of the project site. The 20,888 acres of designated Important Agricultural Land (Robinson Family Partners) touches the northeastern tip of the project site (Application, Exhibit C, Project Figures, C10, page C-10 or electronic document page 280).

Historic use of the project site was irrigated sugarcane, followed by livestock pasture, then the grazing of cattle, sheep, and water buffalo. The "2020 Update to the Hawaii Statewide Agricultural Land Use Baseline" confirms that pasture was, at the time of the Update, the predominant use (Kauai Island Crop Summary, page 9). Seed corn production occupied agricultural lands at some distance to the west and east of the project site.

Soil index classifications
The entire project site has an Overall Productivity Rating of "B" and Land Type of "50i" according to the Land Study Bureau's (LSB) "Detailed Land Classification – Island of Kauai" (L.S.B. Bulletin No. 9; December 1967; page 28). The LSB rating and Land Type indicate this soil has moderate tillability and very good productivity potential for most agricultural uses.

The project site is classified entirely as "Prime" agricultural land according to the Agricultural Lands of Importance to the State of Hawaii. "Prime" indicates land best suited for the production of food, feed, forage and fiber crops and having the soil quality, growing season, and moisture supply needed to produce sustained high yields of crops economically when treated and managed, including water management, according to modern farming methods (Application, Exhibit C, Project Figures, C16, page C-18 or electronic document page 288).

Water resources
The Application (Section 6.6.1, page 6-12 and Exhibit I, Compatible Agriculture Plan, page 8 or electronic document page 395) states that the project has an annual water allocation from Gay & Robinson from an existing irrigation ditch system for compatible agricultural activities, landscaping, and facility use during construction and operation. The amount of water to be allocated is unstated. AES will cover the costs to reroute the existing irrigation infrastructure to accommodate the solar energy facility and the agricultural entity. Doing so should provide animals and crops with a reliable source and sufficient amount of drinking and irrigation water to ensure optimal growth.

Solar panel array
It appears that the compatible agricultural activities will be concentrated in the "central array" which comprises about 62.8 acres (23%) of the 269-acre project site. According to the Compatible Agriculture Plan (Application, Exhibit I, electronic document pages 387-398) the layout of the solar panels "provides a 12-foot-wide workable agricultural corridor" between rows of panels and that "will allow the agricultural partner to consider not only rotational grazing of livestock in this area of the Project but also planted crops with opportunity for mechanical planting and harvesting, a form of agricultural management that is rarely available within solar projects." (emphasis added) The maximum crop height in the central array will be about 3.78 feet and will accommodate livestock as tall as 4.56 feet. An adult sheep standing height from the ground to the apex of the head ranges between 3.08 feet to 4.58 feet.

The solar panels in the 148 acres surrounding the central array will be the "minimum space possible while maintaining the required maintenance clearances…Potential agricultural uses in these areas are somewhat more size-constrained, with a 6-foot-wide by 3.40-foot-high workable space." (Ibid., electronic document page 394).

Perimeter fencing will be erected around each of the six solar panel array areas (Application, Exhibit E, Site Development Plan Set, Sheet 1, or electronic document page 314) This fencing is important for livestock control.

Compatible Agriculture Plan
(Application, Exhibits, Exhibit I, electronic document pages 387-398)
The unique layout of the solar panels described in the previous section "allows rotational grazing of livestock" as well as "planted crops with opportunity for mechanical planting and harvesting" within the 62.8-acre central array (Ibid., electronic document page 392)

Kawailani, Inc., a branch of the Gay & Robinson family, will be the agricultural partner for the solar energy facility. They have experience with cattle and sheep. Their herd plan starts with 100 sheep, and they anticipate a total herd of about 537 head by the end of the 5th year of the plan, with 153 head available for market (Ibid., electronic document page 396).

Kawailani "has access to nearby slaughter facilities and sales channels, enabling it to market to local eateries and supermarkets, as well as to consumers directly." (Ibid, page 9 or electronic document page 396) While sales of sheep/lamb is not required by State law (Section 205-4.5(21), HRS), it is the generation of revenue by agricultural operators selling their agricultural products such as livestock as well as vegetables, melons, fruits, honey, and so forth that will ensure continued agricultural activity. The Department encourages Kawailani to formalize "access to nearby slaughter facilities and sales channels" as this will provide the foundation for other proposed agricultural activities within the solar energy facility.

After the sheep operation is in full operation and income from sheep sales, Kawailani will use income from sheep sales to offset the costs to establish a proposed chicken and egg production operation using mobile chicken coops moving between the rows in the 62.8-acre central array (Ibid., page 10 or electronic document page 397).

Thereafter, Kawailani envisions planting crops throughout the project site (Ibid., page 10 or electronic document page 397) including leafy greens, dry-land taro and asparagus. AES has partnered with the Hawaii Agricultural Research Center (HARC) and Robinson Family Partners have previously worked with HARC on "agrivoltaic" agriculture. If available, this information and data may help in the selection of optimal crop varieties and appropriate cultivation practices.

Compatible Agriculture Plan Feasibility Assessment

(Application, Exhibits, Exhibit J, electronic document pages 401-403)
According to this document, "Kaawanui has a distinct advantage in that the Robinson's currently operate a slaughterhouse and have marketing agreements in place."

Conclusion
In summary, based on the information provided in the Application, the Department of Agriculture and Biosecurity is optimistic that "compatible agricultural activity" will occur within the area occupied by the proposed solar energy facility and the agricultural products raised and grown there will be available to Hawaii's markets and food service businesses.

Sincerely,

Sharon Hurd

Sharon Hurd, Chairperson
Board of Agriculture and Biosecurity

c: Mr. Leo Asuncion, Administrator
Land Use Division
Office of Planning and Sustainable Development
leodoloff.r.asuncion@hawaii.gov

Mr. Kenneth Estes
Department of Planning
County of kauai
kestes@kauai.gov