HAWAIKI

MEMBER OF BW DIGITAL

November 14, 2025

Board of Land and Natural Resources
State of Hawai'i
P.O. Box 621
Honolulu, HI 96809
Email: blnr.testimony@hawaii.gov

Re: Written Testimony in Strong Support of:

Item K-3: CDUA OA-3987 for the Hawaiki Cable Landing Expansion Project.

Item D-17: Grant of Perpetual, Non-Exclusive Easement to Hawaiki Submarine Cable USA, LLC for Submarine Communication Cable Purposes on State Submerged Lands; Issuance of Immediate Construction and Management Right-of-Entry Permit; off Kapolei, Ewa, Oahu, Tax Map Key: (1) 9-2-049: seaward of 001.

Dear Chair Chang and Commissioners:

I. **The Applicant:** Hawaiki Submarine Cable USA, LLC ("Hawaiki") owns and operates the Hawaiki Cable Landing Station (CLS) located in Kapolei. This critical facility acts as a key gateway where the existing Hawaiki Submarine Cable – a subsea fiber optic telecommunications cable system spanning over 9,000 miles, connects Hawai'i to the United States mainland, Australia, New Zealand, American Samoa and Tonga. Within the CLS, the subsea cable connects with local service provider networks, enabling a wide range of "last mile" connectivity that delivers internet, voice and data services to communities across Hawai'i. Recently Hawaiki purchased approximately 22 acres of land immediately adjacent to its existing CLS, specifically to enable and encourage the landing and operation of new subsea fiber optic telecommunications cable systems – The proposed Project.[1]

II. **The Project:** The proposed Project involves the construction of new buried telecommunications infrastructure on approximately 2.5 acres of the recently acquired 22-acre parcel directly adjacent to our existing Hawaiki CLS facility. Planned work includes a beach manhole, a temporary gravel access road, hard stand for the Horizontal Directionally Drill (HDD) staging area, and a subsurface fronthaul conduit system with up to six ducts connecting the new beach manhole to the existing Hawaiki CLS for use with future subsea carrier-neutral cable installations.[2] A portion of the project is proposed in marine waters and will consist of up to three subsurface HDD boreholes of up to 8 inches in diameter in waters of about 50-65 feet. The bore pipes will extend mauka over a length of approximately 2,500 to 3,000 feet to an onshore staging area located on the project site adjacent to the existing Hawaiki Cable Landing Station.[3] A small diver support vessel will operate near the proposed HDD punch-out locations during construction to monitor recreational activity and serve

[1] The proposed Project Site is undeveloped and bordered to the north by residences, to the south by the CLS with residences beyond, and to the west by Farrington Highway and the O`ahu Railway and Land Company. The proposed Project Site is located at TMK (1) 9-2-051:001, (1) 9-2-049-002, (1) 9-2-049:005, (1) 9-2-049:001, and (1) 9-2-051:001. See Application for more detail on Project Site.

[2] Installation of subsea cables is not part of the subject Project.

[3] HDD minimizes disruption to the surface by using a trenchless method, allowing for installation under challenging terrain and existing structures like highways, rivers, and shorelines.

as a platform for trained observers to watch and record marine life behavior. Divers will be used to verify the exit location of each bore pipe, prepare them for future use, and safely recover the HDD drill head assembly.

Supporting perpetual non-exclusive easements for each proposed subsurface HDD bore ensures long-term continuity of connectivity to the Hawaiki Cable Landing Station (CLS), regardless of any future property ownership changes. While such changes may be unlikely, this structure provides certainty for the life of the infrastructure.

Additionally, this approach offers flexibility for future submarine cable systems, enabling them to leverage the same infrastructure without requiring new property agreements – maximizing efficiency and reducing future complexity.

Recognizing that the easement documents themselves may take considerable time to finalize, a supporting Construction Right-of-Entry authorization would enable this critical infrastructure project to proceed without delay while long-term property rights are being secured.

III. **The Project Supports a Public Service pursuant to HAR 13-5-22 and the Public Land Trust:** The proposed use is an identified land use in the Resource subzone of the Conservation District which is intended to benefit the public and is in accordance with the State's public policy and the purpose of the Conservation District.[4]

IV. **Minimal Environmental and Cultural Impacts:** The Project will have minimal environmental and cultural impacts during construction. Shoreline accessibility will cause only limited disruption to residents and traffic. The installation of the new infrastructure beneath the ocean floor has been designed to utilize soft sandy areas, posing minimal risk to delicate coral reefs and associated ecosystems.[5]

Post construction, the only evidence of the project will be a cast-iron manhole cover which will be at or below grade level.

The Applicant will use several mitigative measures, conditions, and best management practices to ensure minimal effects on the natural and cultural resources.[6]

V. **Benefits of the Project to Hawai'i:** Many submarine cable projects choose to bypass Hawai'i because of a perceived complex and lengthy permitting process. Hawaiki with the expansion of its current cable landing facilities, is attempting to make Hawai'i more attractive for future submarine cable projects. Strong reliable internet connections are essential to Hawai'i residents' and visitors' daily lives, the State's economy, and future. Nearly all of Hawai'i's internet, phone, and data traffic travels through submarine fibre optic cables. Undersea cables are literally Hawai'i's lifeline to the rest of the world.

[4] A Public Hearing was held on October 8, 2025 at Nanakuli, State Library. No one attended and no comments were received. Also, the Final Environmental Assessment was reviewed and accepted by DCCA and was published on July 8, 2025.
[5] As part of the U.S. Army Corp. of Engineers ("USACE") Nationwide Permit Process, we consulted with the National Oceanic & Atmospheric Administration ("NOAA") and the National Marine Fisheries Service ("NMFS").
[6] A summary of the mitigation measures to be used is provided in the attached presentation material.

Submarine cable systems have a finite operational lifespan and some of those currently serving Hawai'i are nearing the end of theirs. Without action, there's a real risk of slower connection speeds, increased service outages, and reduced reliability.

Strong digital infrastructure attracts new industries like tech, film, and remote work. That means more high-paying jobs and opportunities for residents.

With stronger internet, students can learn from anywhere, and patients can access telehealth services—even from rural or neighbor island communities.

More subsea cables mean more backup options if one goes down. That's critical during natural disasters or emergencies when communication is vital.

VI. **Supporting Hawai'i's Broadband Initiatives, Connect Kakou and BEAD:** The Project directly supports Connect Kakou and BEAD, the state's initiatives to expand high-speed internet access and digital equity for all residents. Both programs are designed to build a reliable high-speed internet service for communities that currently are underserved or have no internet access.

VII. **Community Outreach:** As part of our initiative, we are actively engaging with communities, local leaders, and stakeholders to ensure that our new infrastructure project reflects the values, needs, and priorities of local residents. Outreach has included, but not limited to, the Lieutenant Governor; The Hawai'i Broadband Office; Local State and City Representatives for the Site; individuals who might have knowledge of, or concerns about, traditional cultural practices at the Site; and the Neighborhood Boards for the area.

VIII. **Conclusion:** We thank the Staff for its recommendation for the Board to approve the CDUA and to grant the Perpetual, Non-Exclusive Easement subject to conditions and we are agreeable to the conditions listed in the Staff Reports. Accordingly, we respectfully request that our Applications for CDUA and Perpetual, Non-Exclusive Easement be granted.

Key members of our project team will be attending the meeting to address any questions that the Board may have. In the meantime, please find attached supporting presentation materials for your review. Thank you for your consideration.

Yours sincerely,

Virginie Frouin

Chief Business Officer Connectivity

Fiber Optic Submarine Cable Landing Facilities Project

14th November 2025

Submarine Cables – Invisible Yet Essential Infrastructure

Portland
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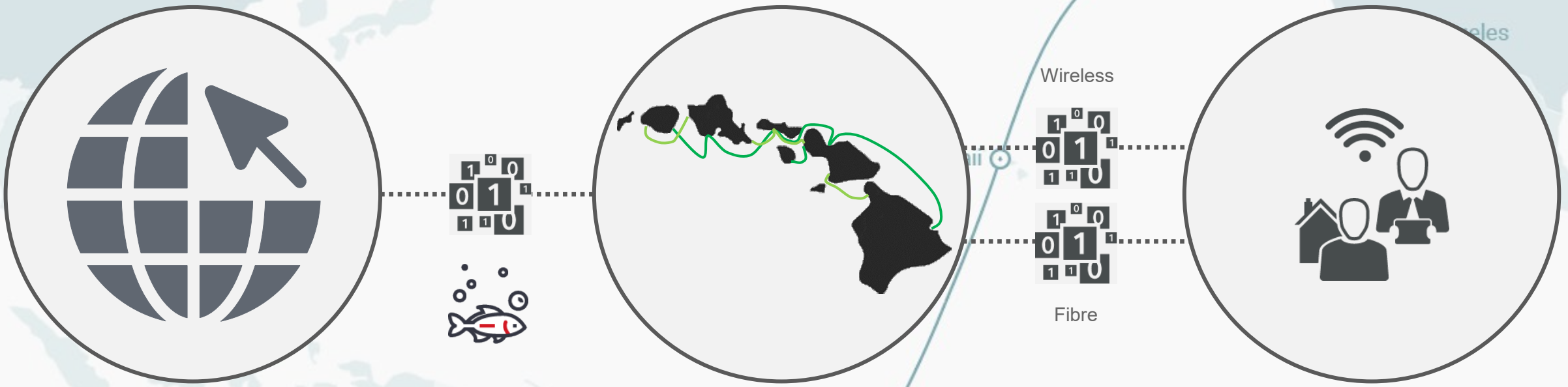

First Mile

International submarine fibre optic cables carry data from large servers located around the world.

Seven cables provide Hawai'i with international and/or interstate connectivity. Two are reaching their operational limits, with others close behind.

New cables are needed to ensure Hawai'ians continue to enjoy access to reliable high-speed internet. Our self-funded project is designed to address this and entice the landing of critical new international submarine cables

Middle Mile

Domestic submarine fibre optic cables and local service provider networks are used to transport this data throughout Hawai'i

There are three operational domestic submarine cables in Hawai'i – two are aging and earmarked for replacement with a State-led project currently underway to build HIFL using Federal funding

Last Mile

Residents and business owners access this data through service provider connections

An improved digital experience will project Hawai'ian talent on the global stage, enable the export of local products and services, and stimulate online collaboration with peers around the world

Over 450 operational subsea fibre optic cables on the seabed today carry more than 99% of the world's international data traffic

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Hawaiki's Existing Operations in Hawai'i

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- Hawaiki was the last international subsea fibre optic telecommunications cable to be deployed in Hawai'i – landing on the west coast of O'ahu
- We own and operate the Hawaiki submarine cable landing station
  - Located just off the Farrington Highway
  - Fully operational since 2018

    Operational permits included Cultural Impact Assessment, Archaeological Inventory Survey, HDD bore test etc.

    Previous HDD drilling experience through rock at this location - latest geotechnical data for the project area shows more of the same
  - Supporting construction services provided by local businesses
  - Staffed by locals employed by DRFortress
- Hawaiki supports high-speed international data connectivity from Hawai'i to the US mainland (OR & CA), American Samoa, New Zealand and Australia today, with construction of a vital subsea link to Tonga underway
  - The only carrier-neutral facility providing access to international capacity on a fair and equal basis

Proposed project is Phase 2 of our Hawai'ian operations

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Phase 2 Project – Major Components

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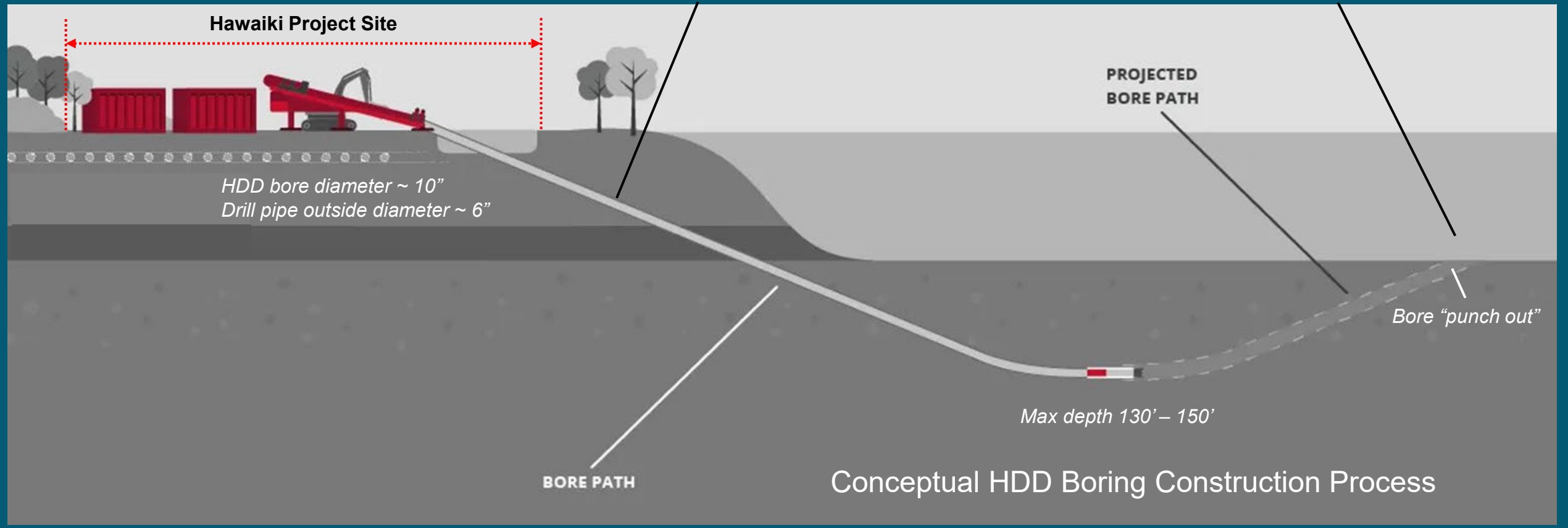
Three underground conduits to house future fiber optic telecommunications cables
Buried concrete vault (i.e. a manhole or BMH) within our property boundary
Below ground conduits between the BMH and existing Hawaiki cable landing station and a temporary access road also on our property

HDD bores pass underneath the Farrington H'way and OR&L Railroad 60' – 80' target depth

Marine survey complete, ocean floor mapped HDD bores designed to "punch out" in sand thus avoiding the coral and its ecosystem Conduits will be left 2' – 3' below the seabed



Conceptual HDD Boring Construction Process

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Community Benefits

Long haul subsea telecommunications cables use the Hawaiki infrastructure to connect large servers and content from around the world that will transit Hawai'i's Middle Mile and Last Mile Networks to reach your connected devices

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Benefitting Hawai'i

This infrastructure supports connecting the west coast of Oahu and the interisland networks to the rest of the world with stronger, future-proofed connectivity.

Advancing Connectivity

Through enabling new domestic or international subsea telecommunications cables offering diversity and reliability to the state. In support of the State of Hawai'i Kākou initiative to achieve full fiber-optic connectivity by the end of 2026 and to ensure digital equity and access for all residents by 2030.

Environmentally Safe and Culturally Sensitive

We have performed an Environmental Assessment, Cultural Impact Assessment and Cultural Resources survey across the project sites Installation of the new infrastructure under the ocean floor has been carefully planned and approved to utilize the soft sandy bottom posing little risk to delicate coral reefs and associated ecosystem.

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Environmental Considerations - Marine Survey at Kahe Point

As part of our environmental impact assessment, an extensive marine survey was conducted at Kahe Point on the west coast of O‘ahu. Key findings are presented in the following images

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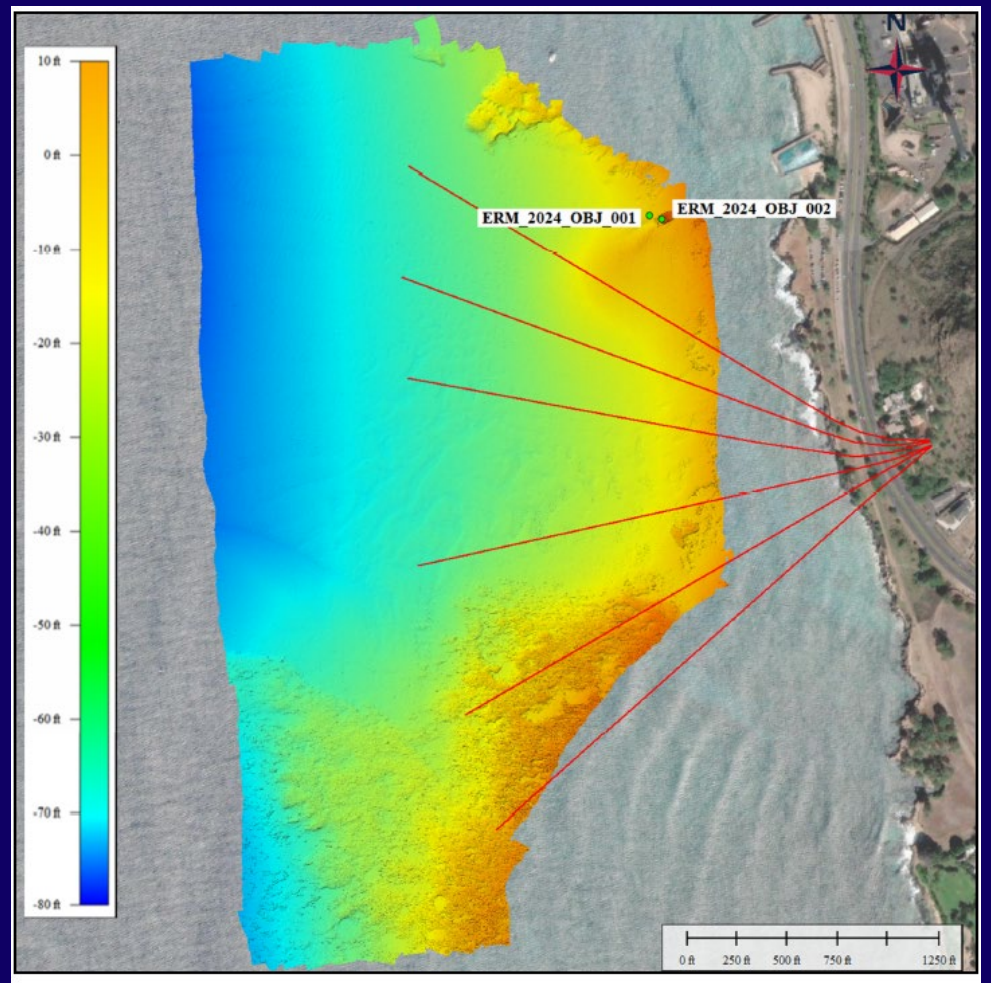
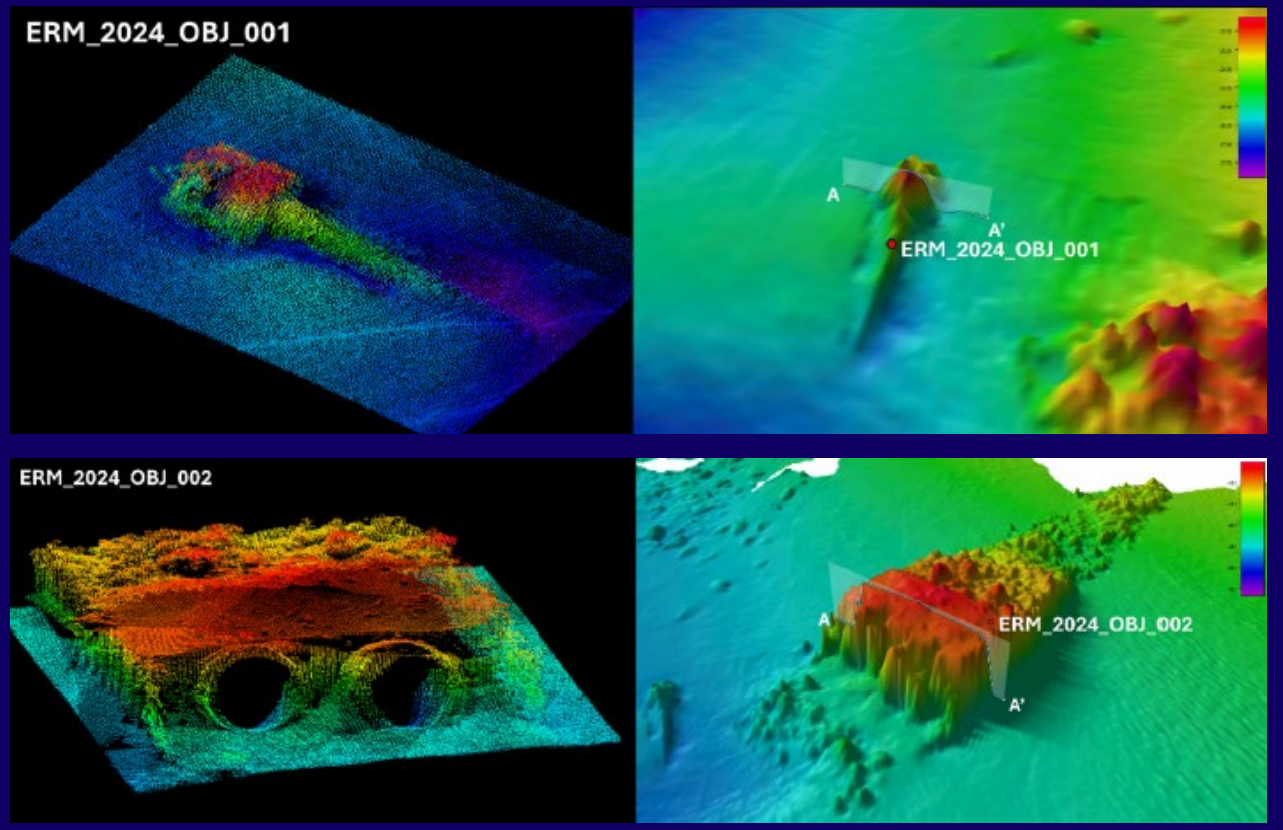


Figure 3-7 – Multibeam Bathymetry with Objects

Multibeam Bathymetry identified a sunken light tower (22ft) and warm water outfall (11ft) believed to be associated with the nearby Kahe Power Plant



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Environmental Considerations – Best Management Practices

To protect the environment and meet regulatory requirements, Pac-SLOPES Best Management Practices (BMPs) will be applied throughout the project

Practice	Description (Examples)
Marine Protection Measures	🪸 Avoid contact with corals and coral reefs 📋 Conduct pre-work surveys and briefings to identify sensitive areas 🐢 Avoid interaction with ESA-listed marine species 🕒 Schedule activities to avoid sensitive periods (e.g., coral spawning) 👀 Maintain constant vigilance by trained, dedicated observers 📝 Submit daily observer logs to NMFS ⛔ Halt work if ESA-listed species enter the project area 🦭 Report monk seal sightings promptly ⚓ Control deployment and recovery of objects to/from the seabed
Waste and Discharge Control	🌧️ Preparation of a stormwater management plan to mange run-off 🛡️ Development and implementation of an erosion control plan to prevent soil erosion 🧪 Preparation and implementation of a pollution control plan to prevent contamination 🚧 Installation of suitable temporary access road and drill pad to minimize site disturbance
Waste Management	🗑️ Proper disposal of waste materials in accordance with local and federal regulations ♻️ Recyclable materials will be sorted and processed to reduce landfill impact 🧪 Hazardous substances securely stored and handled to prevent spills or contamination
Noise and Vibration Mitigation	🔇 Employ noise mitigation solutions 🗓️ Project activities planned during less sensitive times
Monitoring and Reporting	🔍 Routine inspections to verify implementation of Best Management Practices 📊 Continuous tracking of environmental indicators to detect and address potential impacts

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Community Engagement

Early engagement with the local community has been a key component of our project planning. Through ongoing open communication, consultation, and collaboration, our aim is to ensure that community concerns are heard and that the benefits of the project are shared

➔ Ongoing Community Outreach

Meetings with important community members including kūpuna, and other key local representatives

Consultation with key environmental advocates including Alika and team at Kuleana Coral Restoration

Public engagement through open door sessions at community meeting venues in Wai‘anae and Kapolei

Mail outs to neighbours with positive ongoing meetings with residents in dwellings adjacent to the project site

Distributed flyers in the community and created a dedicated email inbox for feedback and questions

community@hawaiki.us

Hosted visits to existing cable Kapolei cable landing station and adjacent project site

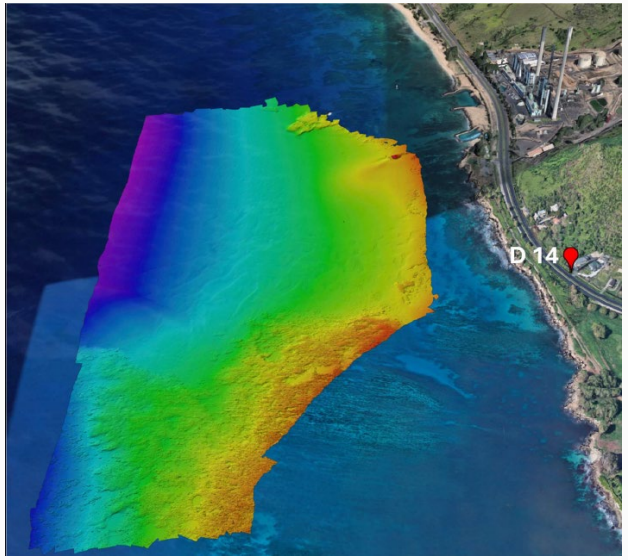
➔ Environmental & Cultural Studies

We have performed extensive cultural, archaeological and environmental assessments – both makai and mauka of Farrington Highway and adjusted our project plans accordingly.

Should any culturally significant artifacts be discovered, we’ll refer to respected community cultural practitioners

➔ Community Support

We are supporting the community through a scholarship program designed to encourage and support the development of local talent



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THANK YOU