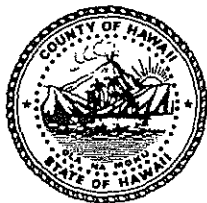


William P. Kenoi
Mayor



Bobby Jean Leithead Todd
Planning Director

Margaret K. Masunaga
Deputy Planning Director

County of Hawaii

PLANNING DEPARTMENT

Aupuni Center • 101 Pauahi Street, Suite 3 • Hilo, Hawaii 96720
Phone (808) 961-8288 • Fax (808) 961-8742

January 18, 2011

Sandra Pechter Song
Attorney At Law
10 Kamehameha Avenue
Hilo, HI 96720

Dear Ms. Song

DETERMINATION OF PRE-EXISTING LOTS
'Ōla'a Houselot Subdivision, Ola'a, Puna, Hawai'i
Tax Map Key 1-7-026:037

This is in response to your letter dated December 21, 2010, and accompanying attachments, requesting a determination of pre-existing lots for the above-described property.

We have reviewed the documents submitted, our department records and those of the Department of Finance—Real Property Tax Division (RPT) in accordance with Article 11 (Pre-existing Lots) of the Subdivision Code (Sections 23-117 through 23-120).

Our review of the records has found the following in concurrence with your submittal:

1. Lot 25 was created by 'Ōla'a Sugar Co., Ltd. as "Houselots at 10 Miles" subdivision which was recorded through Tax Maps Bureau Index No. 49 on May 17, 1948;
2. Lot D-12 was created from Lot D by Land Court Application 1053, Map 16 on April 28, 1948;
and
3. Lot D-12-A was created from Lot D-12 by Land Court Application 1053, Map 29 on October 4, 1951 as a part of the Volcano Highway realignment.

We do not have any records of these lots being consolidated with each other or any other lot adjoining them.

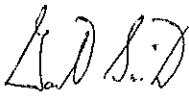
Sandra Pechter Song
Attorney At Law
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January 18, 2011

In view of the above, we confirm that Parcel 037, currently described as one (1) Tax Map Key Parcel, is indeed, composed of the following two (2) separate legal lots of record:

1. Lot 25, area of 14,941 sq. ft.; and
2. Lot D-12-A, area of 9,342 sq. ft.


Should you have any questions, please feel free to contact Jonathan Holmes of this department.

Sincerely,


BJ LEITHEAD TODD
Planning Director

JRH:Inm

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xc:  Tax Maps and Records Supervisor
Real Property Tax Division-Hilo
Manager, DWS
Director, DPW