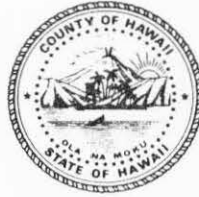


Stephen K. Yamashiro
Mayor



Virginia Goldstein
Director

Russell Kokubun
Deputy Director

County of Hawaii

PLANNING DEPARTMENT

25 Aupuni Street, Room 109 • Hilo, Hawaii 96720-4252
(808) 961-8288 • Fax (808) 961-8742

November 17, 2000

Robert G. Williams
President, Principal Broker, CRB
Prudential Orchid Isle Properties
391 Kilauea Avenue
Hilo, HI 96720

Dear Mr. Williams:

DETERMINATION OF PRE-EXISTING LOTS
TMK: 3-1-01:01

This is to acknowledge receipt of your letter of September 21, 2000, and documents regarding the subject matter.

Please be advised that we have reviewed the documents submitted, our department records, as well as those of the Real Property Tax Division, and determined that the subject property consists of eighteen (18) separate legal lots of record:

1. Portion of Grant 1350, consisting of approximately 1.370 acres;
2. Portion of Grant 1058, consisting of approximately 1.900 acres;
3. Portion of Grant 910, consisting of approximately 19.129 acres;
4. Portion of Grant 910(RR Lot 91), consisting of approximately 0.420 acres;
5. Portion of Grant 910, consisting of approximately 0.556 acres;
6. Portion of Grant 910(Lot 22C Remainder), consisting of approximately 0.098 acres;
7. Portion of Grant 910, consisting of approximately 0.821 acres;
8. Portion of Grant 910(Hwy Lot 22D Remainder), consisting of approximately 0.371 acres;
9. Portion of Grant 912, consisting of approximately 4.000 acres;
10. Portion of Grant 912(RR Lot 92), consisting of approximately 0.480 acres;
11. Portion of Grant 912, consisting of approximately 2.400 acres;
12. Portion of Grant 909, consisting of approximately 2.300 acres;
13. Portion of Grant 909(RR Lot 93), consisting of approximately 0.310 acres;
14. Portion of Grant 909, consisting of approximately 0.950 acres;
15. Portion of Grant 913, consisting of approximately 11.913 acres;

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Robert G. Williams
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16. Portion of Grant 913(RR Lot 94-1), consisting of approximately 0.532 acres;
17. Portion of Grant 913, consisting of approximately 0.470 acres; and
18. Portion of Grant 913(RR Lot 94-3), consisting of approximately 0.050 acres.

It is our understanding that, based on this information provided regarding pre-existing lots, you will be submitting an application for consolidation and resubdivision of the subject parcels which would result in the development of specific metes and bounds for the subdivided lots. If consolidation and resubdivision is not the intent, then it is recommended that a modern metes and bounds survey be conducted for a more accurate and current land area determination and that a map reflecting this information be submitted for certification.

A request for separate tax map key parcel numbers should be in writing to the Real Property Tax Division.

Should you have any questions, please feel free to contact Ed Cheplic of this department.

Sincerely,



VIRGINIA GOLDSTEIN
Planning Director

ETC/RTU/RSK:lnm

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xc: Roy Uchida, Tax Maps and Records Supervisor II
Real Property Tax Division-Hilo
Manager-DWS