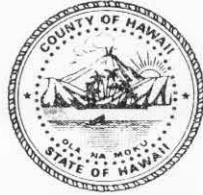


Harry Kim
Mayor



Christopher J. Yuen
Director

Roy R. Takemoto
Deputy Director

County of Hawaii

PLANNING DEPARTMENT

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

December 12, 2001

John C. Cross, President
Mauna Kea Agribusiness Company, Inc.
PO Box 15
Papaikou, HI 96781-0015

Dear Mr. Cross:

DETERMINATION OF PRE-EXISTING LOTS
TMK: 3-1-001:006 and 012

This is to acknowledge receipt of your letter of October 24, 2001, 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 properties consists of four (4) separate legal lots of record:

TMK: 3-1-001:006

1. Grant 1058, consisting of approximately 106.913 acres;
2. Portion of Grant 912 consisting of approximately 1.64 acres;

TMK: 3-1-001:012

3. Portion of Grant 912 consisting of approximately 3.89 acres; and
4. Portion of Grant 909 consisting of approximately 3.020 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.

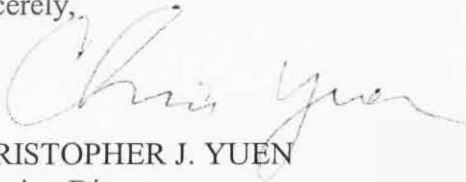
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John C. Cross, President
Mauna Kea Agribusiness Company, Inc.
Page 2
December 12, 2001

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,



CHRISTOPHER J. YUEN
Planning Director

ETC:lnm

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xc: Tax Maps and Records Section
Real Property Tax Division-Hilo
Manager-DWS