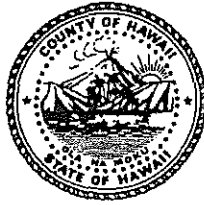


William P. Kenoi
Mayor



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

November 12, 2009

Michael Moore
Tsukazaki Yeh & Moore
85 West Lanikāula Street
Hilo, HI 96720-4199

Dear Mr. Moore:

DETERMINATION OF PRE-EXISTING LOTS
TMK: 3-2-001:019

This is in response to your letter dated February 13, 2008. We apologize for the length of time to respond.

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 that the parcel, along with the adjacent Parcel 020 is indeed bisected by an "old road" which is a government road. As such, Parcel 019 is actually two (2) non-contiguous lots separated by a 30-ft. wide roadway lot.

We have no record of the roadway lot having been officially abandoned or disposed of by the County or State governments nor having been consolidated with Parcel 19 or any adjacent lots. Therefore, please be aware that this remains a public road and the public has a right of access through this right-of-way.

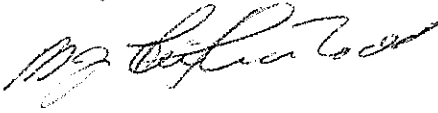
You may want to have a modern metes and bounds survey be conducted for a more accurate and current land area determination and that a map reflecting this information may be submitted for certification.

A request for an additional TMK Parcel number should be by, or authorized by, the owner and be directed to our Tax Maps and Records Section.

Michael Moore
Tsukazaki Yeh & Moore
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Should you have any questions, please feel free to contact Jonathan Holmes of this department.

Sincerely,



BJ LEITHEAD TODD
Planning Director

JRH:lnm

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xc: Tax Maps and Records Supervisor
Real Property Tax Division-Hilo
Manager-DWS
Director-DPW
Amy Self w/copy of PD Letter (01-27-06)