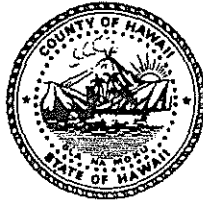


William P. Kenoi
Mayor



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

October 26, 2009

Jerry E. Bragdon, Principal Broker
Worldwide Realty Inc.
Waiākea Villas
400 Hualālai Street, Suite 11-C
Hilo, HI 96720

Dear Mr. Bragdon:

DETERMINATION OF PRE-EXISTING LOTS

TMK: 3-6-005:017

This is in response to your letter dated September 2, 2009.

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 four (4) lots:

1. Portion of Grant 3688 containing 16.405 acres;
2. Portion of Grant 5528 containing 0.678 acres;
3. Portion of old Consolidated Railway right-of-way (dropped parcel 081) containing 0.985 acres; and
4. Portion of Grant 3688 (dropped parcel 016) containing 1.125 acres.

We have no record of the lots having been officially consolidated with each other or any adjacent lots.

It is our understanding that, based on this information provided regarding pre-existing lots, you may 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, 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.

Jerry E. Bragdon, Pricipal Broker
Worldwide Realty Inc.
Page 2
October 26, 2009

Per Section 23-120, be aware that of the four (4) lots, only three (3) can be used to create buildable lots. The remaining lot can be consolidated but only resubdivided into a roadway or other non-buildable lot.

A request for additional TMK Parcel numbers should be by the owner and be directed to our Tax Maps and Records Section.

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