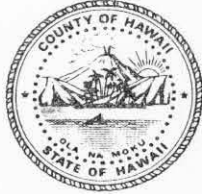


Harry Kim
Mayor



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

November 30, 2001

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: 9-3-003:009

This is to acknowledge receipt of your letter of September 28, 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 property consists of two (2) separate legal lots of record:

1. Portion of Land Patent Grant 2720 consisting of 47.00 acres; and
2. Portion of Land Patent Grant 2445 (Parcel 9) consisting of 62.45 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.

8794
DEC 4 - 2001

Robert G. Williams
President, Principal Broker, CRB
Prudential Orchid Isle Properties
Page 2
November 30, 2001

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