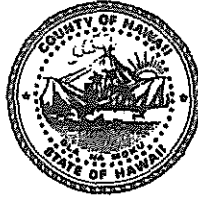


Harry Kim
Mayor



Christopher J. Yuen
Director

Brad Kurokawa, ASLA
LEED® AP
Deputy Director

County of Hawaii
PLANNING DEPARTMENT

101 Pauahi Street, Suite 3 • Hilo, Hawaii 96720-3043
(808) 961-8288 • FAX (808) 961-8742

May 23, 2006

Mr. Michael W. Moore, Esq.
TSUKAZAKI YEH & MOORE
Attorneys At Law
85 W. Lanikaula Street
Hilo, HI 96720

Dear Mr. Moore:

SUBJECT: VARIANCE PERMIT-VAR 05-019
Agent: MICHAEL W. MOORE, ESQ.
Applicant(s): JAMES COBB, ET AL.
Owner(s): JAMES COBB, ET AL.
Request: Variance from Chapter 23, Subdivisions
Tax Map Key: 1-7-017:022 and 164, (SUB 04-000152)

After reviewing your variance application, the Planning Director certifies the approval of your variance application subject to variance conditions. VAR 05-019 permits proposed 6-lot subdivision (SUB 04-0152) without a water supply system and construction roadway improvements required by the DPW. The variance request is from Hawaii County Code, Chapter 23, Subdivisions, Division 2, Improvements Required, Section 23-84, Water Supply, (1)(2), and agricultural pavement and other roadway requirements required by the Department of Public Works (DPW) or Chapter 23, Subdivisions, Article 6, Improvements, Division 2, Improvements Required, Section 23-87, Standard for non-dedicable street; escrow maintenance fund, and Section 23-93, Street lights.

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Mr. Michael W. Moore, Esq.
TSUKAZAKI YEH & MOORE
Page 2
May 23, 2006

In view of additional information submitted by the applicant's agent, the Planning Director has concluded that the variance from the minimum subdivision water system requirements and variance from access and roadway requirements required by an earlier DPW memorandum dated November 15, 2004 can be modified to allow alternative roadway improvements consisting of approximately 6000 linear feet +/- of "non-dedicable" 12-foot wide agricultural pavement roadway, including minimum 2-20 foot wide (40 feet long) agricultural pavement pullouts, and necessary signage, etc. to be installed within "South Road" and "50-foot Wide Road Reserve" in accordance with DPW-Standard Detail R-39 and permit 10-foot wide compacted "gravel" roadway and 6 feet wide grassed shoulders within the "50-Foot Wide Road Reserve" and fronting the proposed subdivision can be approved based on the following findings:

BACKGROUND

1. **Location.** The subject property(s), Lot 22 consisting of 61.746 acres and Lot 19 consisting of 74.319 acres, are within Oloo Reservation Lots, being a portion of Grant 8559-B, Apana 16 to William C. Lunalilo, and situated at Keaau, Puna, Hawaii.
2. **Zoning.** The subject property is zoned Agricultural (A-20a) by the County and designated Agriculture ("A") by the State Land Use Commission (LUC).
3. **Subdivision Request/PPM.** The owner's filed a proposed 6-lot subdivision application (SUB 04-000152) on or about May 12, 2004. Further action on this pending subdivision application and the application's preliminary plat map (PPM) is being deferred according to a letter dated November 30, 2004 in the subdivision file.
4. **Variance Application.** The subject variance application was acknowledged by Planning Department letter dated April 25, 2005 and further information was submitted by the applicant's agent in a letter dated February 9, 2006. The applicant's original background report (Dated: February 12, 2005) states in part the following:

Re: Water Variance-Page 5:

"DWS cannot supply water to these lots without "extensive improvements and additions, including source storage, transmission, booster pump, and distribution facilities being constructed. They added that sufficient funding is not available and no time schedule is set to do these improvements."

Mr. Michael W. Moore, Esq.
TSUKAZAKI YEH & MOORE
Page 3
May 23, 2006

“Also, as I am sure you are aware, drilling private wells in volcanic rock formations, (sic) and constructing private storage, transmission, and distribution facilities would be cost prohibitive and would substantially deprive the applicant of the normal use and rights of this property. Such an expensive alternative would create unusual hardship and unfair restrictions on the enjoyment of this forested property.”

Re: Road Variance-Page 3-4:

“In regards to the roadway issues, the proposed subdivision is served by a network of public and private roadways that are virtually all “substandard” by HCC and DPW standards. Some of these roadways, like South Road, are privately maintained by the Keau Maintenance Association (KMA), of which I am an active, dues paying member.

As far as bringing these roads up to “standard, “ (sic) the cost for upgrading and paving the approximately 1.7 mile stretch from the proposed subdivision to Huina Road would cost over ONE HALF Million Dollars (\$500,000.00) by the most recent estimate.” (sic)

Subsequent to the receipt of the application and comments received from surrounding property owners opposing the variance and the comments from “KMA” and others, the applicant’s agent forwarded a letter dated February 9, 2006 together with additional information regarding the KMA current position regarding the variance requested and current cost estimates or bid proposals to construct roadway improvements within the South Road Right-of-Way.

5. **Agency Comments and Requirements-VAR 05-019:**

- a. The Department of Water Supply (DWS) memorandum dated May 4, 2005 states in part:

“We have reviewed the subject application; and the comments in our memorandum of November 15, 2004, still stand.

Please be informed that the Department's existing water system facilities cannot support the proposed subdivision at this time. Extensive improvements and additions, including source, storage, transmission, booster pumps, and distribution facilities must, must be constructed. Currently, sufficient funding is not available and no time schedule is set."

- b. The County of Hawaii Fire Department memorandum is dated May 9, 2005. (Refer to memorandum in file).

"In that the catchment system will also be used for fire protection, it is recommended that the fire department connection to the tank be located in an area accessible by fire apparatus."

- c. The State Department of Health (DOH) memorandum is dated May 13, 2005. (Refer to memorandum in file).
- d. Access and Roadway Improvements (Off-Site) required for SUB 04-000152. The DPW memorandum dated November 15, 2004 in the subdivision files states in part:

"Access to the subdivision is provided by South Road, a substandard private road. To comply with the requirements of Section 23-34 of the Hawaii County Code (HCC), the substandard access shall be improved to conform with the following standards:

- a. §23-87. Construct minimum 20-ft wide agricultural pavement conforming to DPW Std Det R-39. Where grades are 8% or greater, the roadway section shall be paved per DPW Std Det R-34.
- b. Submit construction plans and drainage report for review and comment.
- c. §23-93. Install streetlights/sign/pavement markings as required by Traffic Division.
- d. §23-63. Verify the subdivision's right of access over the private road."

6. **Notice to Surrounding Owners/Posted Sign.** The applicant's agent submitted affidavits regarding a notice mailed to property owners to list of surrounding property owners and photograph of a sign posted on subject property. According to the agent's affidavits and submittals, it appears that a notice was mailed on or about May 3, 2005. (Note: The variance application was submitted prior the Ordinance No. 05 135).

7. **Comments from Surrounding Property Owners or Public.** No other agency comments were received. The following letters supporting and/or objecting to the variance application were received:
 - 7a. Letter dated May 5, 2005 from Jack Furtado objecting to subject variance application together with other submittals were received on or about May 6, 2005.
 - 7b. Letter dated May 6, 2005 from Susie Yong supporting subject variance application.
 - 7c. Letter dated May 6, 2005 from Karl Rad (Keaau Maintenance Association -KMA letterhead) endorsing proposed subdivision; and subsequent letter cited below dated May 18, 2005 from Karl Rad.
 - 7d. Letter dated May 9, 2005 from Bruce Morgan supporting subject variance application.
 - 7e. Fax/Letter dated May 9, 2005 from Leonard Kubousek, Et al. supporting subject variance application.
 - 7f. Letter/comments dated May 10, 2005 regarding road ownership and access from David G. Schell, GM, Island Princess Macadamia Nut Company.
 - 7g. Letter dated May 12, 2005 from Don Shaw, AIA supporting subject variance application.
 - 7h. Petition (14 signatures) received on May 16, 2005 from Susan Hamilton, Et al.
 - 7i. Letter/Comments from KMA dated May 18, 2005.

Mr. Michael W. Moore, Esq.
TSUKAZAKI YEH & MOORE
Page 6
May 23, 2006

- 7j. Letter/comments dated June 27, 2005 from Susan Hamilton and Jane Furtado regarding roadway improvements to South Road.
- 7k. Letter/comments date August 31, 2005 from Jack Furtado together with an extract from Honolulu Advertiser (HA) dated July 3, 2005.
- 7l. Letter/comments dated January 20, 2006 from Karl Rad, President, Et al. of the Keaau Maintenance Association (KMA) endorsing proposed subdivision.
- 7m. Objection letter dated January 23, 2005 from Jane F. Furtado.
- 7n. Letter/comments dated January 20, 2006 from David G. Schell.
- 7o. Letter/comments (Dated November 17, 2005) received on February 10, 2006 from Gary Rosenberg (Eden Farms)/John Ivey (Ivey Ranch).

Most of the earlier comments and objections letters are related to variance from the roadway requirements; and concerns regarding the advertisement in the HA (Dated July 3, 2005) related to an offering or listing of the subject TMK property(s) or subdivision for sale.

The applicant's agent submitted further background information and cost estimates to construct minimum 12 feet wide agricultural roadway within South Road. In addition, the agents' background information discussed and cited past expenditures by the subdividers to improve the 50-foot Wide Road Reserve and cost to install alternative roadway improvements within South Road and additional roadways within the 50 feet Wide Road Reserve from South Road to the 50 feet Wide Road Reserve fronting proposed subdivision. The Planning Director reviewed the agent's information and agreed to grant the roadway variance from the DPW roadway requirements, provided, the applicant/owners construct alternative roadway improvements within South Road and additional roadways within the 50 feet Wide Road reserved from South Road to the 50 feet Wide Road Reserve fronting the subdivision were constructed prior to issuance of final subdivision approval (Refer to variance conditions).

Mr. Michael W. Moore, Esq.
TSUKAZAKI YEH & MOORE
Page 7
May 23, 2006

Furthermore, because the roadway variance granted contains terms and variance conditions which are substantially different from the applicant's original variance application, although it is an approval, you have the opportunity to appeal such terms and conditions to the Board of Appeals.

ALTERNATIVES/SPECIAL AND UNUSUAL CIRCUMSTANCES

Water Supply. The first alternative requires the applicant or owners to extend and/or improve the existing county water system and provide the necessary dedicable water system improvements in accordance with DWS standards.

The second alternative would be to design, drill and develop private wells and install the necessary water system improvements in accordance with DWS standards.

The imposition of extending or improving the existing public DWS water system or providing an approved alternative private water system meeting DWS standards for the pending 2-lot subdivision would be putting excessive demands upon the applicant or owners when a more reasonable alternative (e.g. private individual rainwater catchment system for potable and emergency requirements) is available.

Lot Access/Roadways. The first alternative requires the owners or subdividers to construct 20-foot wide agricultural pavement according to Standard Detail R-39 within "South Road" only; and provide proof that the applicant can utilize the 50 feet wide road reserve as access, etc. according to November 15, 2004 DPW comments in the subdivision file and Chapter 23, Subdivisions.

The second alternative acknowledges that the paved roadway within "South Road" consists of partly paved and gravel roadways; and, that the terminus of the paved roadway, located approximately 6000 +/- feet from the subdivision, is approximately 10 to 12 feet wide. The concerns expressed by surrounding property owners regarding subdivision access and condition of improvements within South Road/Road Reserve were discussed with the applicants' agent. The applicant is asking for a variance to acknowledge and recognized past expenditures to improve access and roadways within the South Road and Road Reserve; and, is willing to construct and make additional (limited) road improvements to within South Road in accordance with Standard Detail R-39; and install a "compacted" 10-foot wide gravel roadway and grassed shoulders fronting the entire subdivision to the intersection of the 50 feet wide Road Reserve and South Road.

Mr. Michael W. Moore, Esq.
TSUKAZAKI YEH & MOORE
Page 8
May 23, 2006

INTENT AND PURPOSE OF THE SUBDIVISION CODE

Water Variance. The intent and purpose of requiring a water system for and within the proposed subdivision is to assure that adequate water is available for human consumption and fire protection.

The State Department of Health has no specific rules or regulations relating to the utilization, construction or inspection of private roof catchment water systems for potable or emergency uses.

The analysis of rainfall maps at the Planning Department and rainfall information provided by the applicant's agent appear to indicate that there is adequate rainfall within the subject property and surrounding areas to support individual or separate private rainwater catchment systems for potable and emergency uses for the proposed subdivision.

According to a map- Plate 6-WATER-RESOURCES INVESTIGATIONS REPORT 95-4212, the proposed subdivision appears to be nearest active rain gage station "KURTISTOWN 91.14" ("91.14") (National Oceanic and Atmospheric Administration-NOAA) which received -177.51 inches of rain during 2002. Other historical rainfall data records maintained by the Hawaii State Climate Office (HSCO) for a rain gage station "MOUNTAIN VIEW NO 3" ("91.9") near the proposed subdivision shows a mean rainfall average of 204.80 inches between the years 1990 and 1998. The analysis of the applicant's submittals compared with recent rainfall data and historical rainfall data for the surrounding areas indicate the proposed subdivision will receive approximately 170 inches +/- of rainfall yearly.

Given the unusual nature of the subdivision and annual rainfall within the immediate area, the proposed subdivision the variance request is reasonable. The provisions for water storage, water distribution, and construction of private rain water catchment system(s) will be addressed by the applicant or future lot owner(s) of the proposed lots.

Roadway Variance. The intent and purpose of access requirements to a proposed subdivision is to ensure legal and physical access to the proposed lots that is clearly defined and accessible from a public road by domestic and farm vehicles, police, fire, and other service vehicles under various weather conditions without constant maintenance.

The proposed subdivision and adjoining areas are agricultural in character. The status of property access and status of ownership of the privately owned and/or publicly owned network of rights-of-way within this district was created before statehood and prior to adoption of the 1967 Zoning and Subdivision Codes by the County of Hawaii.

Mr. Michael W. Moore, Esq.
TSUKAZAKI YEH & MOORE
Page 9
May 23, 2006

According to the subdivision's PPM, the subject TMK property(s) have frontage along 50 feet wide "Road Reserve"; and, the PPM purports the property also fronts a 30 feet wide "Roadway". (However, per May 10, 2005 letter received from Hawaiian Princess, Et al., any roadway along the easterly boundary of proposed Lot 19-B cannot utilize a private roadway lot or property owned by Purdyco Ltd.) It appears that the applicants recently incurred costs to "open" or clear a section of the 50-foot wide Road Reserve on their own to the intersection of the Road Reserve and South Road. South Road and the 50-foot wide Road Reserve is privately owned by the KMA and maintenance of the roadway within South Road and the Road Reserve are shared by "members" or users. The owners are members of the KMA and are required to pay yearly dues for road maintenance of South Road and 50-foot wide Road Reserve fronting the proposed subdivision.

The DPW memorandum requires the applicant to construct a 20-foot wide agricultural pavement within South Road. Pursuant to the applicant's agent and recent information (cost estimates, etc.) regarding alternative paved improvements within South Road and 50-foot wide Road Reserve, the Planning Director has concluded that a variance from DPW requirements to install a 20-foot wide agricultural pavement within South Road and 50-foot wide road reserve fronting the subdivision can be modified subject to variance and variance conditions. In lieu of constructing a 20-foot wide agricultural pavement meeting DPW-Standard Detail R-39 within South Road and the 50 feet wide Road Reserve, the applicant or owner(s) will be required submit alternative subdivision construction plans and construct approximately 6000 linear feet (12-foot wide) agricultural pavement, 2-pull outs (40 feet in length and minimum 20-foot wide) for 2-way traffic within South Road in accordance with DPW-Standard Detail R-39, and install necessary improvements at intersection of the Road Reserve and South Road (e.g. signs for safety, etc.). In addition, the applicant or owners shall construct or install minimum 10-foot wide "compacted" gravel roadway and minimum 6-foot wide shoulders within the 50-foot wide Road Reserve from the intersection South Road and 50 feet wide Road Reserve to the proposed subdivision. The 10 feet wide compacted gravel roadway and grassed shoulders shall be installed within the 50-foot wide Road Reserve Right-of-Way fronting the proposed subdivision.

The subject variance application was acknowledged by letter dated April 25, 2005. Additional time was requested by the applicant to complete the variance background report. The applicant's agent agreed to extend the decision date to on or before May 25, 2006.

Based on the foregoing findings, this variance request would be consistent with the general purpose of the zoning district and the intents and purposes of the Zoning Code, Subdivision Code and the County General Plan. Furthermore, the variance requested will not be materially detrimental to the public's welfare and will not cause substantial adverse impact to the area's character and to adjoining properties.

DETERMINATION-VARIANCE CONDITIONS

The variance requested to allow a proposed subdivision of the subject TMK property without providing a water system meeting DWS standards and DPW roadway improvements is hereby **approved** subject to the following variance conditions:

1. The applicant, owners, their assigns, or successors shall be responsible for complying with all stated conditions of approval.
2. Submit subdivision construction plans to construct 6000 linear feet +/- of "non-dedicable" 12-foot wide agricultural pavement roadway, including minimum 2-20 foot wide (40 feet long) agricultural pavement pullouts, and install necessary signage, etc. at the intersection of "South Road" and "50-foot Wide Road Reserve" meeting DPW-Standard Detail R-39 and construct 10-foot wide compacted "gravel" roadway and 6 feet wide grassed shoulders within "50-Foot Wide Road Reserve" for agency approval. The alternative roadway construction plans shall be submitted for review and approval by the agencies and completed or bonded prior to issuance of Final Subdivision Approval to SUB 04-000152.
3. WATER VARIANCE: The owners, their assigns, or successors shall file a written agreement or approved written document with the Planning Department within one (1) year from the issuance of tentative subdivision approval and prior to receipt of final subdivision approval of SUB 04-000152. This written agreement shall contain the following deed language, being covenants, conditions, and restrictions affecting proposed subdivision or lots not serviced by a County water system and shall be duly recorded at the Bureau of Conveyances of the State of Hawaii by the Planning Department at the cost and expense of the owners:
 - a. The owners agree and accept the fact that a County dedicable public water system is not now able to service the proposed subdivision SUB 04-000152. Should the Council adopt a Unified Impact Fees Ordinance setting forth criteria for the imposition of exactions or the assessment of impact fees, conditions included herein shall be credited towards the requirements of the Unified Impact Fees Ordinance.

- b. The owners agree and accept the fact that the County will not, at this time, bear the responsibility of supplying public water to the proposed or affected additional lots created by SUB 04-000152 not serviced by a County water system. No further subdivision of the lots created by SUB 04-000152 will be permitted unless county water system requirements and other requirements of Chapter 23, Subdivisions, are met.
- c. Any lots created by SUB 04-000152 may not be made subject to a condominium property regime.
- d. Any farm dwelling constructed on a proposed lot not serviced by a County water system shall be provided with and maintain a private potable rain catchment system which includes a minimum 6000-gallon water storage capacity for domestic consumption or potable uses. This private water catchment system shall adhere to the Department of Public Works, Building Division's "Guidelines for Owners of Rain Catchment Water Systems" as well as the State Department of Health requirements related to water testing and water purifying devices.
- e. Each permitted farm dwelling shall be provided with and maintain a private water supply system which includes an additional minimum 3,000 gallon water storage capacity for fire fighting and emergency purposes. The location and capacity of the emergency water supply system, including the necessary compatible connector system, shall meet with the approval of the Hawaii County Fire Department. The Hawaii County Fire Department also advises as a precautionary measure for other uninhabited agricultural structures that consideration be given to the provision of a similar water storage system for fire fighting and emergency purposes.
- f. In the event that there are any amendments or changes to the subdivision after the agreement is signed, the applicant shall be responsible for informing the County Planning Department of such amendments or changes so that the agreement can be amended concomitantly. Further, the written or recorded agreement shall be binding upon the owner(s), their successors or assigns and shall be incorporated as an exhibit and made part of each agreement of sale, deed, lease, or similar documents affecting the title or ownership of the existing property or approved subdivided lots.

- g. In the event that the County notifies the owner(s) of the lot(s) created by SUB 04-000152 that the County Water System has been upgraded or an improvement district initiated to enable service to the lots created by SUB 04-000152, the owner(s) of the lot(s) created by SUB 04-000152 shall participate in such improvement district or shall pay their pro-rata share of the upgrade and installation of laterals, as determined by the Department of Water Supply.
 - h. The subdivider and all grantees, successors, and assigns acknowledge that the parcel was created by a variance from the normal subdivision requirements of Hawaii County, and that there are no special or unusual circumstances applying to the property which deprive the owner of substantial property rights or to a degree which obviously interferes with the best use or manner of development of the property, and hence, no grounds exist or will exist for a variance from the subdivision code to permit further subdivision of the property, and that changes in the owner's personal or financial situation after acquiring the property also will not constitute grounds for a variance from the subdivision code to permit further subdivision of the property.
4. ROAD VARIANCE. The subdivider, owners, their assigns, or successors understand that the lots arising out of SUB 04-000152 will use and maintain the privately owned roadways on their own without any expectation of governmental assistance to maintain the existing access or roadway improvements within the privately roadways identified on the subdivisions preliminary plat map or any other necessary access and utility easement(s) within the proposed subdivision.

The applicant, owners, their assigns, or successors shall file a written agreement or approved written document with the Planning Department within one (1) year from the issuance of tentative subdivision approval and prior to receipt of final subdivision approval of SUB 04-000152. The proposed lots created by the proposed subdivision shall pay their fair share to the existing Road Association-KMA or include appropriate deed language, being covenants, conditions, and restrictions, which affect the entire property and/or proposed lots arising from the approval of the pending subdivision application and be duly recorded at the Bureau of Conveyances of the State of Hawaii by the Planning Department at the cost and expense of the applicant:

- a. The applicant and/ or owner(s) shall indemnify and defend the State of Hawaii or County of Hawaii from any and all liability arising out of vehicular access to and from the subject property utilizing existing private roadway and any utility and access easement(s).

Upon written demand of the County of Hawaii, the applicant and /or owners, their assigns, or successors shall agree to participate and pay their fair share percentage of any improvement district adopted for the purpose of roadway improvements serving the proposed lot(s) arising out of SUB 04-000152 and the "Road Reserve" fronting SUB 04-000152. Should the improvement district require acquisition of any privately owned rights-of-way fronting the lots arising out of SUB 04-00015, such rights-of-way shall be dedicated to the County without cost and the value of the dedication credited to the fair share contribution of the respective lot owner(s). Should the Council adopt a Unified Impact Fees Ordinance setting forth criteria for the imposition of exactions or the assessment of impact fees, conditions included herein shall be credited towards the requirements of the Unified Impact Fees Ordinance.

- b. The future lot owner(s) agree to participate in any road maintenance agreement or/and pay their fair share to maintain the existing access roadways.

In the event that there are any amendments or changes to the subdivision after the agreement is signed, the applicant shall be responsible for informing the County Planning Department of such amendments or changes so that the agreement can be amended concomitantly. Further, the written or recorded agreement shall be binding upon the owner(s), their successors or assigns and shall be incorporated as an exhibit and made part of each agreement of sale, deed, lease, or similar documents affecting the title or ownership of the existing property or approved subdivided lots.

4. The subdivision application's (SUB 04-000152) final plat map shall meet all the requirements of the Hawaii County Zoning Code and the Subdivision Code not covered by this variance. No other variances from Chapter 23, Subdivisions, shall be granted to permit subdivision application SUB 04-000152.

5. The subdivider, owner(s), their assigns or successors shall pay any outstanding real property taxes and comply with all other applicable State statutes and County ordinances pertaining to building improvements and land use.

Should any of the foregoing stated conditions not be complied with, the Planning Director may proceed to declare this Variance Permit null and void.

In accordance with a recent charter amendment and Ordinance No. 99-111, you may appeal the director's decision and request the following:

- (a) Any person aggrieved by the decision of the director in the administration or application of this chapter, may, within thirty days after the date of the director's written decision, appeal the decision to the board of appeals.
- (b) A person is aggrieved by a decision of the director if:
 - (1) The person has an interest in the subject matter of the decision that is so directly and immediately affected, that the person's interest is clearly distinguishable from that of the general public: and
 - (2) The person is or will be adversely affected by the decision.
- (c) An appeal shall be in writing, in the form prescribed by the board of appeals and shall specify the person's interest in the subject matter of the appeal and the grounds of the appeal. A filing fee of \$250 shall accompany any such appeal. The person appealing a decision of the director shall provide a copy of the appeal to the director and to the owner of the affected property and shall provide the board of appeals with the proof of service.
- (d) The appellant, the owners of the affected property, and the director shall be parties to an appeal. Other persons may be admitted as parties to an appeal. Other persons may be admitted as parties to an appeal, as permitted by the board of appeals.

The board of appeals may affirm the decision of the director, or it may reverse or modify the decision, or it may reverse or modify the decision or remand the decision with appropriate instructions if based upon the preponderance of evidence the board finds that:

- (1) The director erred in its decision; or

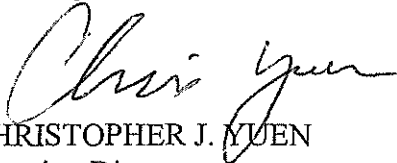
Mr. Michael W. Moore, Esq.
TSUKAZAKI YEH & MOORE
Page 15
May 23, 2006

- (2) The decision violated this chapter or other applicable law; or
- (3) The decision was arbitrary or capricious or characterized by and abuse of discretion or clearly unwarranted exercise of discretion.

In view of the above, we have enclosed GENERAL PETITION FOR APPEAL OF DECISIONS BY PLANNING DIRECTOR.

Thank you for your understanding and patience during our review.

Sincerely,



CHRISTOPHER J. YUEN
Planning Director

WRY/DSA/CJY:cd
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Enclosure

xc: DPW-Engineering Branch (Ltr. only)
DWS-Engineering Branch (Ltr. only)
SUB 04-000152 (Ltr. only)
Jack Furtado (Ltr. only)
Jane F. Furtado (Ltr. only)
Susie Yong (Ltr. only)
Karl Rad (Ltr. only)
Bruce Morgan (Ltr. only)
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KMA-Karl Rad, Et al. (Ltr. only)
Gary Rosenberg-Eden Farms (Ltr. only)
John Ivey-Ivey Ranch (Ltr. only)