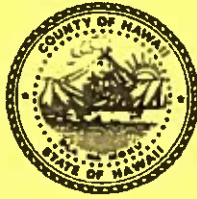


Harry Kim
Mayor



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

March 22, 2007

Mr. Gregory R. Mooers
Mooers Enterprises, LLC
P. O. Box 1101
Kamuela HI 96743

Dear Mr. Mooers:

Subject: Special Management Area Use Permit Assessment Application (SAA 07-000228)
Applicant: Dick Chun
Land Owner: Yee Hop Ltd.
Request: Consolidation & Resubdivision of Five (5) Lots into Five (5) Lots
TMK: 8-8-2:14, 17 & 22, Alika, South Kona, Hawaii

After further review of your submittals and our files, we have not been able to find evidence that Parcel 14 consists of three legal lots of record.

The Real Property Tax Office and our department have no record that TMK: 8-8-2:14 consists of three legal lots of record. Therefore, proof of prior existence of these lots must be established and also documentation that no further action (consolidation/resubdivision) has occurred to alter their pre-existing configuration.

The submitted partition deed which was recorded in Liber 362, Pages 261-263 does not provide the proof that we are requesting.

We recommend the following supporting evidence, if available, be submitted for pre-existing lots determination in accordance with Article 11 of the Subdivision Code:

1. Registered survey of the metes and bounds of the lots.
2. Warranty deeds with multi-part parcel description
3. Maps
4. Leases
5. Mortgages
6. Affidavit(s)
7. Other supporting documents.

Mr. Gregory R. Mooers
Mooers Enterprises, LLC
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March 22, 2007

In view of the foregoing, we will hold your application in abeyance pending receipt of the requested documentation.

If you have questions, please feel free to contact Esther Imamura of this department at 961-8288, extension 257.

Sincerely,



CHRISTOPHER J. YUEN
Planning Director

ETI:cd

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xc: Ms. Esther Imamura, Long Range Planning
Mr. Daryn Arai, Ministerial Division
Planning Department, Kona
Department of Public Works, Engineering – Kona