

**M**OOERS  
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*Land Use Alternatives*

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September 29, 2014

Mr. Duane Kanuha, Director  
Planning Department  
County of Hawaii  
101 Pauahi Street, Suite 3  
Hilo Hawaii 96720

**RE: SPECIAL MANAGEMENT AREA ASSESSMENT (SAA 14-001154)**  
**LESSEES: CHARLES AND DIANE BUNDRANT**  
**REQUEST: SINGLE FAMILY HOME, LANDSCAPING AND WELL REPAIR**  
**TMK: (3) 8-3-005:001, 020, & 021**

Dear Mr. Kanuha:

Your letter of August 28, 2014, determined that the proposed action identified above was "...exempt from the definition of "development" and shall not require further review against the SMA guidelines." There were twelve (12) conditions attached to the determination of exemption. We are agreeable with all of the conditions, except one, we would like to have condition #5 removed.

Condition #5 reads as follows:

*A public access plan shall be submitted and approved by the Planning Department prior to issuance of a building permit for the single-family residence. This plan shall, at a minimum, provide a mauka-makai vehicular and pedestrian public access on or along Ke'ei Beach Road from Puuhonua Road to the intersection of Ke'ei Beach Road/southern end of Keawaiki Road where a parking easement sufficient to accommodate approximate ten (10) vehicles shall be provided. The access shall be reasonably safe, as determined by the Planning Department. The public access plan shall address each of the elements outlined in the "What should be included in a Public Access Plan" guide which is enclosed for your reference.*

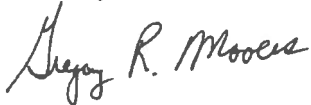
The requested mauka-makai vehicular and pedestrian access along Ke'ei Beach Road already exists. The proposed action of building a single-family dwelling, landscaping and retrofitting the existing well on the subject property has absolutely no impact on the public's current or future use or access over the subject property. The use of Ke'ei Beach Road through the property is not affected in any manner by the project and the public will be free to continue to walk and drive along this section of roadway to the village of Ke'ei. In addition, the landowner, Kamehameha Schools, has a proposed realignment of this roadway submitted to the Office of Conservation and Coastal Lands that will provide a new graded roadway along its waterline easement south of this property.

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Providing parking on the subject property provides no benefit to the public as there is no beach access in this immediate area and subject property is not an ocean-front property. The only effect this suggested parking would have would be to possibly damage historic features near the roadway which this proposed action proposes to protect. Furthermore, there is no nexus to the proposed development of a single-family home that has no effect on public resources or public access

We strongly believe this condition is not justified and provides no benefit for the public. Should you or your staff require any additional information or have any questions, please contact me directly.

Sincerely,

A handwritten signature in cursive script that reads "Gregory R. Mooers".

Gregory R. Mooers  
President