



Halekua Development Corporation

2024 N. King St. • Honolulu, Hawaii 96819 • Telephone (808) 848-4241 • Telecopier (808) 848-2344

July 11, 2000

Ms. Esther Ueda, Executive Officer
Land Use Commission
Dept. of Business, Economic Development & Tourism
State of Hawai'i
P. O. Box 2359, Room 406
Honolulu, HI 96804

2000 JUL 12 A 9:49
LAND USE COMMISSION
STATE OF HAWAII

Subject: Filing of 2000 Annual Report for LUC Docket No. A92-683
Halekua Development Corporation

Dear Ms. Ueda:

This is in response to your comments of the Sixth Annual Report, as follows:

1. In regards to the general progress of the project, please clarify when Petitioner anticipates project financing.

The Petitioner has filed a Project Loan Application with a lender (Morgan, Weinstein & Co.) on April, 2000. Since then we have been submitting additional detailed information as requested by Lender, which will be needed to complete the Loan documentation. The Projected Closing of Loan is scheduled for November, 2000.

2. In regards to Condition No. 3, please clarify the current status of Petitioner's involvement with the Leeward O'ahu Transportation Management Association (LOTMA) in compliance with this condition. The Housing and Community Development Corporation of Hawai'i stated in its letter to you dated September 21, 1999, that the Petitioner was in arrears in LOTMA dues and would not be included in LOTMA's 1999 annual report.

The Petitioner will comply as soon as the Project Loan is closed and funded.

3. In regards to Condition NO. 5, please clarify the status of coordination with the Department of Health (DOH). DOH has stated in its letter to you dated October 1, 1999, that its Office of Solid Waste Management was not contacted and the Petitioner was advised to do so.

Halekua Development Corporation

Ms. Esther Ueda
July 11, 2000
Page two

The Petitioner has not contacted the Office of Solid Waste Management due to the fact that the project is not yet ready to start construction. However, the Petitioner will comply with this Condition as soon as the development plan progresses.

4. In regards to Condition No. 6, please clarify the total acreage that is being dedicated to the Department of Education (DOE). DOE stated in their letter to you dated September 17, 1999, that the twelve (12) acres dedicated by the Petitioner are entirely for the Royal Kunia Elementary School campus including the playground portion.

The Petitioner has agreed to provide 12 acres to the DOE. All school facilities and play areas will be contained within the 12-acre campus.

5. In regards to Condition No. 11, please clarify the status of the inquiry expressed by DOH in its aforementioned letter to you about an airfield north of Royal Kunia that was used for aircraft pesticide application.

The Petitioner has notified the Robinson Estate and HRT of the inquiry expressed by DOH. To date, no proposal by either side has been made as to how, when, or what they will decide to do about the situation.

6. In regards to Condition NO. 13, please clarify the status of mitigating fugitive dust as required by DOH. DOH has stated in its aforementioned letter to you that they received numerous complaints regarding fugitive dust from construction activities, and required the implementation of mitigative measures to address the complaints.

The Petitioner did not receive any complaints regarding any fugitive dust from any construction activities because there were no construction activities in Royal Kunia Phase II for at least 4-5 years.

7. In regards to Condition No. 14, please clarify the status of the air quality analysis required by DOH. DOH in its aforementioned letter to you stated that an air quality analysis should be performed which would include DOH's review of the proposed protocol of methodology, the area of study, the modeling approach, the assumptions, and emissions data.

Halekua Development Corporation

Ms. Esther Ueda
July 11, 2000
Page three

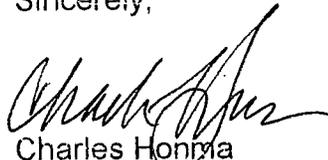
The Petitioner will comply with this Condition when the Loan closes and development of plan/specs/consultants are instructed to proceed as per the requirements of Condition No. 14.

8. In regards to Condition No. 19, please clarify whether the Robinson Owners have formally extended the deadline for the purchase of the site for the agricultural park. Also, please clarify when it is anticipated that the Department of Agriculture will obtain the site.

As of the May 17, 2000 Annual Report (see Exhibit A), the Petitioner states that there are no significant changes since that time.

If you have any questions, please do not hesitate to contact me at 848-2377.

Sincerely,



Charles Honma
Project Manager

CH:jkt:200007