

SMC KONA LLC

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June 20, 2024

VIA EMAIL to
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Mr. Daniel E. Orodenker, Executive Director
State of Hawaii, Land Use Commission
235 S. Beretania Street, RM 406
Honolulu, Hawai'i 96813

Mr. Zendo Kern, Planning Director
County of Hawaii Planning Department
101 Pauahi Street, Suite 3
Hilo, HI 96720

**RE: 2023 ANNUAL REPORT to the Land Use Commission Docket No.
A03-744 - Successor Petitioner SMC KONA LLC
TMK: (3) 7-2-005-001**

Dear Mr. Orodenker and Mr. Kern,

Successor Petitioner SMC KONA, LLC ("Petitioner") submits its 2023 Annual Report to the Land Use Commission, State of Hawai'i and the County of Hawaii Planning Department in compliance with Condition 26 of the Findings of Fact and Conclusions of Law, and Decision and Order in Docket No. A03-744 ("Decision and Order") approved on June 13, 2005.

Status Report on Commission's Conditions of Approval

As to the Conditions of Approval in the Commission's Decision and Order, here is a status report on compliance.

1. Affordable Housing.

Petitioner shall provide affordable housing opportunities for residents of the State of Hawai'i to the satisfaction of the County, acting in accordance with the County's Ordinance No. 05-23, Affordable Housing Policy for the County of Hawai'i. Petitioner shall provide no less than 100 onsite affordable units in accordance with the Petitioner's representations to the Commission or whatever number of affordable units is deemed acceptable by the County in accordance with the County's Ordinance No. 05-23, Affordable Housing Policy for the County of Hawai'i, whichever is greater. The location and distribution of the affordable housing units or other provisions for affordable housing shall be under such terms as may be mutually agreeable between the Petitioner and County.

Petitioner will work with the County of Hawaii to satisfy its requirements consistent with Ordinance No. 05-23, Affordable Housing Policy for the County of

Hawai'i. All affordable housing units will be built within the Petition area. In collaboration with DHHL (Department of Hawaiian Home Lands), 132 affordable housing units will be provided for Native Hawaiians. Petitioner has had discussions with the County Office of Housing & Community Development and provided for their review a draft of the housing agreement in October 2021. The 132 units of affordable housing will primarily target those earning 60% or less of the Area Median Income (AMI) and will exceed the affordable housing credits required by the county.

2. Public School Facilities.

Petitioner shall contribute to the development, funding and construction of public-school facilities as determined by and to the satisfaction of the DOE. Petitioner shall enter into an agreement with the DOE covering the specific terms of such contribution prior to final subdivision approval and file such agreement with the Commission and the County.

An agreement has been executed with DOE under which Petitioner proposed to provide the DOE with either the rent-free use of 8,000 square feet building for 20 years or payment of per unit impact fees to satisfy this condition.

3. Wastewater Facilities.

Petitioner shall design and construct its wastewater disposal system in compliance with the requirements of the County and the DOH.

Petitioner has obtained the required State Department of Health approvals for the onsite injection wells, which is planned to be used in the final wastewater treatment plant design in compliance with the DOH. Petitioner has engaged WSI International to start the design of the onsite packaged Wastewater treatment plant (WWTP), the WWTP will be designed and constructed in compliance with the requirements of the County and DOH.

4. Wastewater Agreement for Underground Injection Offsite.

Prior to final subdivision approval, Petitioner shall provide the Commission and the County with a copy of the executed agreement to inject wastewater underground offsite and above the UIC line on the adjacent State-owned land to the south of the Petition Area, or with other such landowner and location as approved by DOH.

Upon further review of the situation for the backup underground injection well required by the State Department of Health for the sewer treatment plant, Petitioner determined that the well could be located within the Petition area. The State Department of Health concurred. Petitioner has updated the disposal well permits as required by DOH and has gotten approved by DOH.

5. Traffic Impact and Mitigation.

Petitioner submitted the Draft Final Traffic Impact Analysis Report (TIAR) on October 30, 2023 and received a written approval from the Hawaii Department of Transportation (HDOT) on January 29, 2024. The TIAR complies with the County of Hawaii Ordinance No. 21-27 Condition U.1.a and will serve as the basis for obtaining final design approval from HDOT. Petitioner shall fund, design and construct its share of local and regional transportation improvements as determined by the SDOT and the County, which includes but is not limited to:

a. Midlevel connection with Ka’iminani Drive.

Petitioner shall provide at its sole cost and expense a two-lane roadway between the Petition Area and Ka’iminani Drive in an alignment approved by the County and the University and the acceptable to any other State agency with a property interest in the land on which the two-lane roadway is located.

This is also required by Condition U of the County Rezoning Ordinance No. 21 27.

The alignment of the road was approved by the State Department of Land & Natural Resources. The roadway was constructed in 2013 -2014. This roadway is currently open to the public and provides access to the University of Hawai’i campus and Palamanui.

b. Mauka-Makai Connector Road.

A mauka-makai connector road providing public access between Queen Kaahumanu Highway and the Mamalahoa Highway shall be provided at Petitioner’s sole cost and expense. Said mauka-makai connector road shall connect to Mamaloahoa Highway as Petitioner and the County may agree.

Petitioner will comply with this condition. The County of Hawaii zoning conditions concerning the connector roads between Queen Kaahumanu Highway and Mamalahoa Highway will be complied with.

c. Right-Of-Way for an Alternative Mauka-Makai Connector Road.

Petitioner shall reserve a right-of-way along the east (*mauka*) portion of the Petition Area to support the possible future connection to the Mamalahoa Highway. Petitioner shall construct at its sole cost and expense all portions of said future road that is within the Petition Area. Any proposed road construction plans and associated utility easements which may impact the Lowland Dry Forrest Preserve shall be subject to prior review and approval of the Commission and shall include consultation with

the County, such that County engineering standards or other County requirements do not adversely impact the Lowland Dry Forest Preserve.

Petitioner's plans include rights-of-way that will allow connection to a new connector to Mamalahoa Highway. Petitioner will be responsible for the costs of the road within the project which will provide that connection.

d. Request to Limit Vehicle Traffic on Portions of Makalei Drive.

In the event that the *mauka-makai* road connector road utilizes Makalei Drive, to promote greater traffic safety, Petitioner shall prior to final subdivision approval, use reasonable efforts to petition the County to limit motor vehicle traffic on Makalei Drive as a through street, as it transverses Makalei Estates, to only those vehicles that have gross vehicle weight of less than 10,000 pounds.

Petitioner will comply with this condition.

6. Integrated Natural Cultural Resource Management Plan (INCRMP).

Petitioner shall implement the revised INCRMP including completion of all plans (with appropriate approvals), covenants and easements required under the revised INCRMP. Such implementation shall include, but not be limited to the following:

Petitioner has been implementing this condition. Petitioner is drafting Master Covenants that will apply to the Petition area. The covenants will include the provisions described in the Integrated Natural Cultural Resource Management Plan (INCRMP). Petitioner is also drafting Master Design Guidelines which will apply to development within the Petition Area. The design guidelines cover preservation of certain landforms. Petitioner will also be preparing Conservation Easements to cover the preservation access described in the INCRMP. Drafts of the documents will be circulated to the Land Use Commission and the County Planning Department. The Cultural Advisory Committee has met and will be meeting periodically in the future.

Petitioner obtained the following additional studies which were attached to the First Annual Report as Exhibits B, C, D, and E respectively. Exhibit B is an Update Biological Study done by Dr. Patrick Hart. Exhibit C is a study done by Robert Peck regarding insects and invertebrates in the Project Area. Exhibit D is a survey done by Dr. Patrick Hart regarding the Hawai'ian Hawk ('Io). Exhibit E is a study done by Marcos Gorresen and Kathryn Turner in November 2005 regarding the Hawai'ian Hoary Bat in the Project Area.

Dr. Robert Rechtman of ASM Associates has completed the data recovery plan which has been approved by the State Historic Preservation Division.

An inventory map showing all preservation sites is currently being finalized. All preservation areas have been fenced so they are clearly visible. Petitioner completed clearing of the fire break area around the dry land forest and continues to monitor it. Cultural monitors will be utilized as appropriate.

a. **Preservation of Significant Historic, Cultural, and Natural Resources.**

Petitioner shall preserve all of the identified significant historic, cultural, and natural resources on the Petition Area as represented by the Petitioner to the Commission.

Petitioner will comply with this condition. As reported above, these sites have been identified and marked. They are also shown on the Inventory Map.

b. **Historic Preservation Mitigation Plan.**

Petitioner shall submit data recovery plans and preservation plans to the SHPD and obtain approval of those plans within one year of the issuance of this Decision and Order. If said plans as approved vary from those incorporated into the revised INCRMP, Petitioner shall amend the revised INCRMP to reflect SHPD's recommendations and submit the amended revised INCRMP to the Commission for its approval prior to final subdivision approval.

The State Historic Preservation Division has approved the Data Recovery Plan and the Preservation Plan. The approval letter was previously submitted. There are no changes to these plans which were incorporated into the INCRMP.

Pursuant to the above approval, Petitioner has completed the data recovery as outlined in the approved Data Recovery Plan.

c. **Preservation of Lowland Dry Forest.**

Petitioner shall permanently protect the Lowland Dry Forest Preserve. Any proposed road construction plans, irrigation well sites and proposed access and utility easements which may impact the Lowland Dry Forest Preserve shall be subject to prior review and approval of the Commission.

Petitioner will comply with this condition. As reported above, a fire break and fence around the perimeter of the dryland forest has been established. Petitioner has the additional information from the updated biological study. Potential corridors and sites for roads, irrigation wells, and access and utility easements have been identified and will not impact the Lowland Dry Forest Preserve.

d. **Coordination of Lowland Dry Forest Preservation Efforts.**

Petitioner shall use reasonable efforts to coordinate its preservation of the Lowland Dry Forest Preserve with the State of Hawai'i Department of Land and Natural Resources as the Lowland Dry Forest Preserve extends in some places onto the neighboring state-owned property. Such coordination shall include, but not be limited to: sharing information regarding updated biological surveys; coordinating the development of a fire prevention plan; establishing appropriate firebreaks; and exploring contingencies for using the Project's irrigation systems to control brush fires.

Discussions continue with the State DLNR and non-profit groups regarding the management and stewardship of the Lowland Dry Forest Preserve and possibly some of the forest area on the State lands.

Firebreaks have been established around the Palamanui dry forest preserve and a plan for a firebreak around some adjacent lands has been agreed upon by DLNR and U.S. Fish and Wildlife Services.

The Palamanui Dry Forest Working Group has been formed and is composed of Dr. Pat Hart, Lisa Hadway, Roger Harris and Susan Cordell. This group has met several times in recent years. This group continues to have discussions with the North Kona Dry Land Forest Group about cooperative efforts to preserve the native dry land forests.

Petitioner and the Working Group have met with other interested community groups, including the University of Hawai'i, about participating in the management of the preserve and forest preservation.

e. **Preservation of Flora Outside of Lowland Dry Forest.**

Petitioner shall preserve all flora that are federally listed as Endangered Species throughout the Petition Area. Petitioner shall to the extent practicable, preserve flora identified as non-endangered indigenous and Species of Concern by incorporating such plants into the Project's landscaping and exclusionary fenced areas.

Petitioner will comply with this condition. Several such plants have been fenced in the Petition Area.

f. **Unidentified Archaeological Finds.**

If any burials, archaeological or historic sites such as artifacts, marine shell concentrations, charcoal deposits, or stone platforms, paving's or walls are discovered during the course of construction of the Project, then all construction activity in the vicinity of the discovery shall stop until the

issuance of an archaeological clearance from the SHPD that mitigative measures have been implemented to its satisfaction.

Petitioner will comply with this condition. No incidents have been reported to date.

g. Preservation of Native Hawai'ian Gathering and Access Rights.

Petitioner shall preserve and protect any established Native Hawai'ian traditional and customary rights exercised for subsistence, cultural and religious practices on the Petition Area.

Petitioner will comply with this condition.

h. Updated Biological Survey.

Petitioner shall submit an updated biological survey of the Petition Area to the Commission before construction of the Project begins. The updated biological survey shall include but not be limited to, detailed information pertaining to any significant invertebrates and Hawai'ian Hoary Bats within the Petition Area.

Petitioner has submitted the additional studies in its first annual report regarding updated biological study, insects and invertebrates, Hawai'ian Hawk and Hawai'ian Hoary Bat.

Based on the presence of a specimen of the 'aiea (host tree for the moth) in the Petition Area, Robert Peck's study indicated there was a probability of locating the Blackburn's Sphinx Moth in the Petition Area. Since the time of the study, Petitioner's botanist Patrick Hard has been in the area of said tree but did not see any moths. Dr. Hart will continue to inspect those areas to see if there are signs of the moth.

Gorresen and Turner's report recommended preventing tree cutting or grubbing in forested areas during September through May during breeding season of the Hoary Bat. Although Petitioner will be conducting construction activities during the breeding season of the bat, most construction will take place in open areas with few standing trees. No forested areas will be affected.

Petitioner has enacted the following safeguards to protect the bat: a) Prior to the start of construction in forested areas, Petitioner will have the bat biologists go through the area where roads and waterlines will be constructed to perform reconnaissance for any Hoary Bats that may be present; b) Petitioner will have bat biologists perform inspections at construction sites for the bat in September and December. If bats are sighted in a construction area during breeding season, the biologist will be immediately consulted on mitigative measures to prevent harm to

the Hoary Bat and those measures will be implemented. Construction activities have been very minimal over the past five years.

i. **Cultural Monitor for Grubbing and Grading Activities.**

Petitioner shall retain the services of an appropriate number of qualified cultural monitors such that all grubbing and grading activities within the Petition Area are duly monitored.

Petitioner has complied, and will continue to comply with this condition.

7. **Open Space Buffer.**

Petitioner shall maintain an open space buffer on the Petition Area along Queen Kaahumanu Highway with a minimum width of 800 feet. The only man-made structures allowed in this open space buffer shall be the Northern Project Access Road, the Project's wastewater treatment plant, limited portions of the Project's golf course, and a groundwater monitoring well – as represented by the Petitioner to the Commission. Petitioner shall appropriately screen such uses to maintain the visual continuity of such buffer.

Petitioner has complied with this condition. An Open Space Buffer notice has been recorded in the Bureau of Conveyances as Document No. 2007-006828. The Project's wastewater treatment plant currently being designed will be located in this open space buffer area.

8. **Civil Defense.**

Petitioner shall, on a fair-share basis, fund and construct adequate civil defense measures as determined by the State and County Civil Defense Agencies.

Petitioner will comply with this condition.

9. **Air Quality Monitoring.**

Petitioner shall participate in an air quality-monitoring program as specified by DOH.

Petitioner will comply with this condition.

10. **Noise and Avigation Easement.**

Petitioner shall notify all prospective buyers and future occupants of the Petition Area or portions of the Petition Area that over flights can occur from aircraft using KOA airport. Petitioner shall grant to the State an avigation (right of flight) and noise easement in the form prescribed by the SDOT on any portion of the Petition Area subject to noise levels exceeding 55Ldn.

Petitioner will comply with this condition.

11. Notification of Potential Nuisances – Agricultural.

Petitioner shall notify all prospective and future buyers and future occupants of the Petition Area or portions of the Petition Area of potential odor, noise and dust pollution if there are any lands in the Agricultural District surrounding the Petition Area.

Petitioner will comply with this condition. Documents for this purpose will be developed in conjunction with the Petitioner's sales and leasing documents.

12. Notification of Potential Nuisances – HELCO.

Petitioner shall notify all prospective buyers and future occupants of the Petition Area or portions of the Petition Area of the potential noise and air quality impacts associated with the existing use and proposed improvements to Hawaii Electric Light Company, Inc.'s Keāhole Generating Station and Airport Substation.

Petitioner will comply with this condition. Documents for this purpose will be developed in conjunction with the Petitioner's sales and leasing documents.

13. Hawai'i Right to Farm Act.

Petitioner shall notify all prospective buyers and future occupants of the Petition Area or portions of the Petition Area that the Hawai'i Right to Farm Act, Chapter 165, HRS, limits the circumstances under which pre-existing farm activities may be deemed a nuisance if there are any lands in the Agricultural District surrounding the Petition Area.

Petitioner will comply with this condition.

14. Drainage Improvements.

Petitioner shall fund the design and construction of drainage improvements required as a result of the development of the Petition Area to the satisfaction of the appropriate State and County agencies.

Petitioner will comply with this condition.

Drainage studies have been completed and approved by the applicable County and State agencies. Drainage plans have also been approved by the County Department of Public Works and the State Department of Health. County Department of Public Works also reviews and approves all grading plans.

15. Integrated Solid Waste Management Plan.

Petitioner shall cooperate with the DOH and the County to conform to the program goals and objectives of Chapter 342G, HRS, and the County's approved integrated solid waste management plans in accordance with a schedule and timeframe satisfactory to the DOH. Petitioner shall, in coordination with appropriate State and County government agencies, assist in the planning and promotion of solid waste recycling facilities for the Project. This condition shall be included in the Project's CC&Rs.

Petitioner will comply with this condition and is discussing the same with both the State and County. An initial solid waste management plan has been approved by the County by letter dated August 29, 2008.

16. Groundwater and Near Shore Water Monitoring.

Petitioner shall participate in the coastal water-monitoring program with the SDOT Airports Division. Petitioner shall conduct groundwater monitoring from a monitoring well to be located at the *makai* end of the Petition Area. Monitoring programs and mitigation measures shall be approved by the DOH.

Petitioner is complying with this condition. Petitioner and State Department of Transportation Airports Division engineers have agreed that monitoring will be coordinated with Airport monitoring programs. Petitioner constructed the subject monitoring well by December 31, 2008, and this well is being monitored and managed by the State Airport engineers at Keāhole Airport.

Since a golf course will not be constructed, Petitioner believes that the risk of contamination of ground water from fertilizers or other chemicals has been substantially reduced.

17. Water Service.

Petitioner shall fund and construct adequate water source, storage, and transmission facilities and improvements as represented to the Commission and as required by the County Department of Water Supply to accommodate the Project.

Petitioner will comply with this condition. Petitioner has constructed water system improvements and dedicated said improvements to the County Water Board in accordance with the water agreement approved by Petitioner and Water Board. Improvements include an eleven-million-dollar waterline and storage reservoir constructed in 2014. This system serves the University of Hawai'i Community College at Palamanui (on the adjacent State-owned land), which commenced operations in 2015. Additional water system improvements are ongoing. The water agreement between the County Water Board is currently being updated.

Petitioner plans to use reclaimed R-1 water from WWTP for common areas and park irrigation. The R-1 water irrigation system is under design.

18. Best Management Practices.

Petitioner shall implement best management practices to reduce or eliminate soil erosion and groundwater pollution and implement dust control measures during the development process in accordance with DOH guidelines.

Petitioner will comply with this condition.

19. Water Conservation Measures.

Petitioner shall implement water conservation measures and best management practices, such as use of indigenous and drought tolerant plants and to the extent possible, use Species of Concern and Endangered Species, and incorporate such measures into common areas landscape planning, and shall incorporate low flow fixtures into the construction of all residential and commercial units.

Petitioner will comply with this condition.

The covenants and design standards for Palamanui will require owners to use a list of plants which will include indigenous and drought tolerant plants common to the area. Low flow fixtures will be part of the design standards as well.

Petitioner plans to use reclaimed R-1 water from WWTP for common area and park irrigation.

20. Energy Conservation Measures.

Petitioner shall incorporate solar energy and energy conservation techniques where feasible into design of all residential and commercial units.

Petitioner will comply with this condition.

21. Hazardous Materials.

Storage and/or disposal of hazardous materials on the Petition Area shall comply with all applicable DOH requirements and all necessary permits shall be obtained.

Petitioner will comply with this condition.

22. Golf Course.

Petitioner shall comply with the principles of the DOH's "Guidelines Applicable to Golf Courses in Hawai'i" (July 2002, Version 6). Petitioner shall

develop and maintain the golf course in accordance with the Audubon International's Signature Silver Program Standard. To the extent practicable, the Petitioner will utilize R-1 recycled wastewater to irrigate the golf course.

During the rezoning application the former Petitioner Hiluhilu Development, LLC revised the project by agreeing not to develop the golf course.

Since there will be no golf course, many of the potential impacts such as leaching of fertilizers and pesticides arising from the operation of a golf course will be lessened.

Petitioner will be using the treated wastewater in part for irrigation. The wastewater will be treated to produce waters of R-1 quality. The treated wastewater will be used for irrigation of landscaped portions of the road, the 20-acre active park area, passive parks and for landscaping of the common areas.

The treated wastewater will also be available for irrigation of larger areas such as the hotel site and for use in the plant propagation activities for native Hawai'ian plants.

Although the elimination of the golf course lessens the recreational opportunities for golfers, the recreational opportunities for the general public increased with the provision of the 20-acre active park area. The baseball and soccer fields, along with the outdoor performing arts center and associated facilities that will be part of the first phase of the park master plan will benefit the entire Kona community. The County Department of Parks & Recreation has expressed the need for these recreational opportunities in Kona.

23. University Inn and Conference Center.

As represented before the Commission, the Project shall include an approximate 120-unit University Inn and Conference Center, which shall serve as a business hotel and provide accommodations in conjunction with University operations. The University Inn and Conference Center shall not be designed and operated as resort-type hotel or be used for time-share purposes.

Petitioner will comply with this condition.

24. Compliance with Representations to the Commission.

Petitioner shall develop the Petition Area in substantial compliance with the representations made to the Commission. Failure to so develop Petition Area may result in reversion of the Petition Area to its former classification, or change to a more appropriate classification.

Petitioner will comply with this condition. During the rezoning process, Petitioner had to modify plans which were presented to the Commission. The adoption of the County's Kona Community Development Plan in 2008 also required revisions to

the Project plans presented to the Commission. Nevertheless, the current Project remains in substantial compliance with the representations made to the Commission.

During the County rezoning process, Petitioner was asked, and subsequently agreed to cover a number of costly off-site capital improvements. These included \$5,000,000 for the University building on State land and the construction of Road 4. Petitioner also had to comply with the new affordable housing requirements and its attendant costs.

In order to partially offset the increased cost, Petitioner discussed an increase in the number of residential units for Palamanui. The rezoning ordinance authorized a maximum of 1,116 units which is 271 more units than originally planned, which remains in substantial compliance with the representations made to the Commission. The main constraint on the actual number of units that can be built will most likely be the water units available.

The supporting infrastructure for Palamanui, even with the increased residences will be more than adequate. Petitioner is having an updated traffic study prepared for review by the State DOT and County DPW. The data from the updated study shows that the planned road and intersection improvements will be adequate for Palamanui.

25. Notice of Change of Ownership.

Petitioner shall provide notice to the Commission of any intent to sell, lease, assign, place in trust, or otherwise voluntarily alter the ownership interests in the Petition Area, prior to development of the Petition Area.

Petitioner took ownership of Palamanui on April 1, 2022 by that certain Limited Warranty Deed, recorded at the Bureau of Conveyances, State of Hawaii as Doc. No. A-81310260. Petitioner will file a transfer of ownership contemporaneously with this report. Petitioner will comply with this condition in the future.

26. Annual Reports.

Petitioner shall timely provide without any prior notice, annual reports to the Commission, OP and the County in connection with the status of the subject Project proposed for the reclassification area, and Petitioner's progress in complying with the conditions imposed. The annual report shall be submitted in a form prescribed by the executive officer of the Commission. The annual report shall be due prior to or on the anniversary date of the approval of the Petition.

This report is being submitted in compliance with this Condition 26.

27. Release of Conditions.

Mr. Daniel E. Orodener
Mr. Zendo Kern
June 20, 2024
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The Commission may fully or partially release the conditions provided herein as to all or any portion of the Petition Area upon timely motion and upon the provision of adequate assurance of satisfaction of these conditions by the Petitioner.

Petitioner is not seeking to be released from any conditions imposed at the present time.

28. Notice of Imposition of Conditions.

Within seven days of the approval date of the Petition, the Petitioner shall (a) Record with the Bureau of Conveyances a statement that the Petition Area is subject to conditions imposed herein by the Commission; and (b) File a copy of such recorded statement with the Commission.

The Notice of Imposition of Conditions was recorded in the Bureau of Conveyances on June 23, 2005, as Document No. 2005-123996.

29. Recordation of Conditions.

Petitioner shall record the conditions imposed herein by the Commission with the Bureau of Conveyances within sixty days after the receipt of the Decision and Order pursuant to Section 15-15-92, HAR.

The Conditions contained in the Decision and Order were recorded in the Bureau of Conveyances on September 7, 2005, as Document No. 2005-178780.

Please note that the County of Hawai'i amended its zoning ordinances applicable to this project by way of Ordinance No. 21 25 (MCX-20 zoning) effective March 16, 2021, and Ordinance No. 21 27 (Project District zoning) effective March 31, 2021. A copy of the County amended ordinances are enclosed for your convenience.

If you have any questions or comments, I may be reached at (808)842-4929 or at maiu@nanhawaii.com

Very truly yours,



Micah P.K. Aiu
In House Counsel