

COUNTY OF HAWAI‘I PLANNING DEPARTMENT RECOMMENDATION REPORT

GRAPHIC IMAGES HAWAII, INC. CHANGE OF ZONE APPLICATION (PL-REZ-2024-000057)

Upon careful review of the request against the guidelines for granting a change of zone, the Planning Director is recommending that a **favorable recommendation for a Change of Zone from Agricultural 20-acre (A-20a) to Family Agricultural 1-acre (FA-1a) for 26.762 acres of land be forwarded to the County Council.** Since this recommendation is made without the benefit of public testimony, the Director reserves the right to modify and/or alter this position. This favorable recommendation is based on the following findings:

The applicant is requesting a Change of Zone from an Agricultural-20 acres (A-20a) zoning district to a Family Agricultural-1 acre (FA-1a) zoning district for 26.762 acres of land. The Family Agricultural zoning district, with a minimum area required for each building site of 1-acre, would allow a maximum density of 26 lots.

If the requested change of zone is approved, the applicant is proposed to subdivide the property into 23 lots, with a minimum lot size of 1 acre. It should be noted that the applicant is in preliminary discussions with the Hawai‘i Health Systems Corporation (HHSC) about their possible acquisition of a 7.013-acre portion of the rezone area (Parcel 81) as the site of a proposed medical clinic. Should these discussions be fruitful, the applicant will revise the proposed subdivision layout to exclude that land area. However, should the HHSC not proceed with the medical clinic, the applicant will proceed with the proposed 23-lot subdivision. The applicant anticipates completing the proposed subdivision within 8 years of the approval date of the Change of Zone, at an estimated cost of \$2.2 million.

In order to consider an area for any type of zoning designation, the applicable goals, policies and standards of the General Plan must be adequately addressed. It is only through such a comprehensive policy analysis approach that evaluations and decisions can be made to better time and stage developments to achieve growth determined by the General Plan and related planning documents. The implications of these evaluations and

decisions must be also considered as they may have an impact on similar areas in the County.

The proposed Change of Zone from an Agricultural (A-20a) to a Family Agricultural (FA-1a) zoning district will conform to, among others, the following goals, policies and standards of the General Plan and the Puna Community Development Plan (PCDP). The General Plan is intended to be used as a policy guide for the coordinated growth and development of all sectors of the County. It sets forth goals, policies, standards and courses of action to accommodate growth without congestion, to designate and preserve the lands needed for residential use, commercial and visitor services, industry, agriculture and open space, and to coordinate these uses with the County's service and circulation systems. The overall goals, policies and standards are set forth to physically plan the lands in the County in the best interests of the island's residents. Land use is one of the principal focal points of public concern and policy. The Land Use Element provides the primary basis for direct control and guidance of publicly and privately owned resources.

The Land Use Pattern Allocation Guide (LUPAG) Map component of the General Plan is a representation of the document's goals and policies to guide the coordinate growth and development of the County and reflects a graphic depiction of the physical relationship among the various land uses. The LUPAG Map establishes the basic urban and non-urban form for areas within the County. In most cases, the LUPAG map shows the general location of a particular designation, and the boundaries are not meant to be precisely scaled (e.g., not intended to be interpreted with along parcel lines or with metes and bounds precision).

While the LUPAG map shows the rezone area as important agricultural lands (IAL), the Director determined that the area should be situated within the extensive agricultural (EA) designation given its similar agricultural characteristics to EA designated lands to the west. The EA designation includes lands that are not capable of producing sustained, high agricultural yields without the intensive application of modern farming methods and technologies due to certain physical constraints such as soil composition, slope, machine tillability and climate. According to the Zoning Code, the

FA district provides for a blend of small-scale agricultural operations associated with residential activities and which may be characterized by farm estates, small acreage farms, or subsistence lots and not at an intensive, commercial production scale, thus the FA zoning would be appropriate within the EA LUPAG designation.

The rectangularly shaped rezone area consists of two parcels totaling 26.762 acres of land that gently slopes mauka between the 300- and 400-foot elevation. There is an existing 2,000± square-foot warehouse structure (that was utilized by the previous landowner to store nursery operation supplies and as a small office) situated towards the makai portion of the subject property, as well as a small shed towards the rear. Should the requested change of zone be approved, the applicant will remove these structures to make way for the proposed subdivision.

The rezone area is situated adjacent to the south of Ola Hou Estates subdivision, which was rezoned in 2012 and subdivided in two phases between 2018 and 2021, consisting of 35 one-acre sized lots zoned A-1a. Properties immediately to the east, south and west of the rezone area are similarly zoned A-20a. Located about a quarter of a mile to the west is the Kea‘au Agricultural Lots Subdivision, which was rezoned in 1984 and subdivided in 1985, consisting of 322 one-acre agricultural lots. Further to the north on both sides of the Old Kea‘au-Pāhoa Road are the Kea‘au Elementary and High School complexes and to the south is Pūnana Leo o Hilo complex on lands zoned A-20a and developed under a Special Permit issued in 1979. Land uses within proximity to the rezone area consist of rural lots and public and private educational complexes.

The proposed FA zoning and family-agricultural subdivision will be similar in character and use to the adjoining Ola Hou Estates and nearby Kea‘au Agricultural Lots subdivisions and will establish small family agricultural lots near the Kea‘au Town Center urban core and larger, more expansive agricultural lands to the west.

The U.S. Department of Agriculture (U.S.D.A.) soil survey identifies soils on the property as Panaewa very cobbly hydrous loam (2 to 10 percent slope). These soils consist of well-drained, cobbly hydrous loam that formed in volcanic ash over pahoe-hoe (Panaewa) or A‘a (Ola‘a) bedrock. These soils are not considered as prime farmlands and were generally used for sugarcane, although the Panaewa series were also used for

pasture and woodlands. Permeability is rapid, runoff is slow and the erosion hazard is slight. Additionally, while the Agricultural Lands of Importance to the State of Hawai'i (ALISH) map designates most of the property as "Prime Agricultural Land," the Land Study Bureau's Detailed Land Classification System largely identifies soils of the property as "D" or "Poor" soils for agricultural productivity.

The rezone area is within the Puna Community Development Plan (PCDP) planning area, located just outside and southwest of the Kea'au Regional Town Center boundary. The PCDP's growth management strategy focuses on directing growth towards Regional, Town, and Village centers, with goals and policies aimed at reducing the number of buildable lots outside of town/village centers, preserving agricultural land, and preventing the creation of sub-standard subdivisions that lack sufficient public infrastructure.

Although the proposed zone change and the creation of a 23-lot subdivision will increase the number of buildable lots, this new density will be located just outside the Kea'au Regional Town Center. The development will comply with the Zoning and Subdivision codes and conditions of this ordinance, ensuring adequate public infrastructure. Additionally, the development will align with the lower-density, agricultural character of the surrounding 1-acre lot subdivisions and will allow small-scale, subsistence agriculture by right, maintaining the area's agricultural potential. Based on the preceding, the request is consistent with the PCDP.

All essential utilities and services are available to the property. Proposed access to the project site is from the Old Kea'au-Pāhoa Road via Mamaka and Ohiohi Streets within the adjoining Ola Hou Estates subdivision. These existing County-owned and maintained roadways are constructed with a 20-foot-wide travel lane and 15-foot-wide, paved shoulders within a 50-foot-wide right-of-way. The applicant proposes to construct interior subdivision roadways to a similar, County dedicable standard and dedicated to the County. The preceding will be added as a condition of approval.

Through the application process, both the State Office of Planning and Sustainable Development (OPSD) and residents of the adjacent Ola Hou Subdivision

commented on the need for an alternative access to the project rather than the single ingress/egress to the subdivision as mentioned above.

Currently, the northeast frontage of the rezone area borders a State-owned remnant known as “Pāhoa Gov’t Road,” as identified on a 1972 subdivision map No. 3207. This section of the Pāhoa Gov’t Road, located within a remnant parcel of State-owned lands (Parcel 80), still exists and provides access to the rezone area, though it is not well maintained. Moreover, the existence of this remnant lot prevents a direct roadway connection to the Old Kea‘au-Pāhoa Road and past communications with the State DOT regarding the disposition of this remnant lot have been unsuccessful.

Despite the preceding, the applicant is willing to agree to a condition requiring roadway stub-outs at the project boundaries, including the northeast (makai) project boundary with Parcel 80, instead of the current cul-de-sac design, to reserve a future opportunity for direct access to the Old Kea‘au-Pāhoa Road should the State DOT allow it.

It should be noted that this northeast (makai) roadway stub-out would not apply if the Hawai‘i Health Systems Corporation (HHSC) acquires the 7.013-acre Parcel 81 on the makai side of the rezone area to develop the site as a medical clinic. This action would reduce the overall number of lots that could be developed in the subdivision and make through-traffic from the proposed subdivision to Pāhoa Gov’t Road/ Old Kea‘au-Pāhoa Road infeasible in the future. The Director agrees with the proposed condition language and has added it as a condition of approval.

Section 25-2-46 (d)(1) of the concurrency provision requires a Traffic Impact Analysis Report (TIAR) as part of any rezoning application in situations where the projected use can generate 50 or more peak hour trips. According to the Institute of Transportation Engineers (ITE) Common Trip Generation Rates, the proposed 23-lot subdivision is expected to generate about 23 peak hour vehicle trips and as such, did not require the preparation of a TIAR.

According to the Department of Water Supply (DWS), water can be made available to the project via an existing 8-inch water line within Kea‘au-Pāhoa Road. The rezone area is currently served by an existing 5/8-inch meter and a 1-inch meter and

allotting a total of 3 equivalent units of water equal to an average of 400 gallons of water per day. Based on the preceding, a water commitment can be issued for 20 additional units of water subject to remittance of a water commitment payment. Additionally, the applicant will be responsible for construction of water system improvements, including the extension of existing water mains, service laterals to accommodate a 5/8-inch meter per lot, installation of fire hydrants, and relocation of water system facilities should they be necessary. Finally, the applicant will be required to remit facilities charges for the new service per DWS requirements and convey system improvements, when complete to DWS. Conditions of approval will require the preceding.

There is no municipal sewer in the vicinity of the rezone area, thus a condition of approval will require the installation of individual wastewater systems meeting the requirements of the State Department of Health as part of the building permit process.

There are no municipal waste collection services in the County. According to the application, solid waste will be handled by commercial haulers or individual homeowners, who will dispose of the refuse at authorized transfer stations or landfill sites.

Police, Fire and medical services are available nearby in Kea‘au. Electrical and telephone services are available to the site. A condition of approval will be included to require the applicants to meet all applicable County, State and Federal laws, rules, regulations and requirements.

There are no severe geological or topographical problems for the property that cannot be properly rectified, or which would render the land unusable. There are no significant topographical constraints that would render the land unusable. According to the Flood Insurance Rate Map (FIRM) prepared by the Federal Emergency Management Agency (FEMA), the rezone area is located in Zone “X”, an area of minimal flood hazard. Conditions of approval will require that all development generated runoff be disposed of onsite and that the applicant will comply with Chapter 10, Hawai‘i County Code related to Erosion and Sedimentation Control.

The request is not contrary to Chapter 205A, Hawai‘i Revised Statutes, relating to Coastal Zone Management Area. The rezone area is not situated within the

Special Management Area. It is located approximately 3.9 miles from the nearest coastline and will not be impacted by coastal hazard and beach erosion. There are no identified recreational resources, historic resources, public access to the shoreline or mountain areas, scenic and open space preserves, coastal ecosystems, marine resources, or other natural and environmental resources on the subject property.

The request will not have a significant adverse impact to traditional and customary Hawaiian Rights. In view of the Hawai‘i State Supreme Court’s “PASH” and “*Ka Pa’akai O Ka’Aina*” decisions, the issue relative to native Hawaiian gathering and fishing rights must be addressed in terms of the cultural, historical, and natural resources and the associated traditional and customary practices of the site.

Investigation of valued resources: Given the extensively altered condition of the rezone are due to its former use as sugarcane land and its recent use as a nursery with the cultivation of commercial dracaena, rhaps palms, and avocado trees on most of the property, no formal archaeological reconnaissance survey, oral history of kama‘āina accounts of the area, historical survey of documentary records or floral/faunal studies were included in the applications.

The valued cultural, historical, and natural resources found in the rezoning area. In response to a 2023 grubbing permit application for the rezone area, the State Historic Preservation Division (SHPD) determined that no historic properties would be affected by proposed grubbing due to previous ground disturbing activities associated with land clearing and agricultural activities.

Given the rezone area’s previous ground disturbance and historical agricultural uses, it is unlikely that there are any threatened or endangered plant or animal species located thereon. However, according to the State Division of Forestry and Wildlife (DOFAW), it is possible that threatened or endangered species (e.g., Hawaiian Hoary bat, Hawaiian Hawk, Hawaiian Short-eared Owl, and migratory seabirds could traverse or be found within the rezone area.

Possible adverse effect or impairment of valued resources: There is no evidence of any possible adverse effects or impairments will occur to any valued historic, archaeological, or cultural resources within the rezone area.

It is possible that the development of the rezone area could impact threatened or endangered species habitats if they are found within the rezone area.

Feasible actions to protect native Hawaiian rights: As there is no evidence of any valued cultural, historical, archaeological resources, there is no action to be taken. A condition of approval will be added to address inadvertent archaeological finds (e.g., should any remains of historic sites, (e.g., rock walls, terraces, platforms, marine shell concentrations or human burials) be encountered.

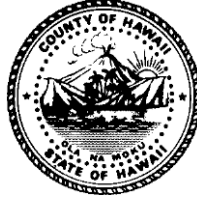
Additionally, a condition of approval will require the applicant to implement mitigation measures recommended by DOFAW should any threatened or endangered animal species be encountered.

Lastly, this recommendation is made with the understanding that the applicants remain responsible for complying with all other applicable governmental requirements in connection with the proposed use, prior to its commencement or establishment upon the subject properties. Additional governmental requirements may include the issuance of building permit, compliance with the Fire Code, among many others. Compliance with all applicable governmental requirements is a condition of this approval recommendation; failure to comply with such requirements will be considered a violation that may result in enforcement action by the Planning Department and/or the affected agencies.

Based on the preceding findings, approval of the Change of Zone request from an Agricultural 20-acre (A-20a) to Family Agricultural 1-acre (FA-1a) zoned district would result in an appropriate land use pattern that will further the public necessity and convenience and the general welfare.

The accompanying draft bill to amend Section 25-8-22 (Puna District Zone Map) is provided for your favorable consideration. Please note the proposed conditions of approval are attached to the draft bill.

COUNTY OF HAWAI'I



STATE OF HAWAI'I

ORDINANCE NO. _____ BILL NO. _____
(Planning Dept.)

AN ORDINANCE AMENDING SECTION 25-8-22 (PUNA DISTRICT ZONE MAP), ARTICLE 8, CHAPTER 25 (ZONING CODE) OF THE HAWAI'I COUNTY CODE 1983 (2016 EDITION, AS AMENDED), BY CHANGING THE DISTRICT CLASSIFICATION FROM AGRICULTURAL – 20 ACRES (A-20a) TO FAMILY-AGRICULTURAL – 1 ACRE (FA-1a), KEA'AU, PUNA, HAWAI'I, COVERED BY TAX MAP KEY: 1-6-003:081 AND 129.

BE IT ORDAINED BY THE COUNCIL OF THE COUNTY OF HAWAI'I:

SECTION 1. Section 25-8-22, Article 8, Chapter 25 (Zoning Code) of the Hawai'i County Code 1983 (2016 Edition, as amended) is amended to change the district classification of property described hereinafter as follows:

The district classification of the following area situated at Puna, Hawai'i, shall be Family-Agricultural-1 acre (FA-1a):

Beginning at the southeast corner of this parcel of land, being also the northeast corner of Lot 2 and on the southwesterly side of Lot 6-B, Kea'au- Pāhoa Road, F. A. S. P. No. S-0130(6), the coordinates of said point of beginning referred to Government Survey Triangulation Station " 'ŌLA'A", being 3,035.81 feet North and 8,766.35 feet East, thence running by azimuths measured clockwise from true South:

- | | | | |
|----|----------|----------|--|
| 1. | 52° 18' | 2,162.75 | feet along the remainder of R. P. 7223, L. C. Aw. 8559-B, Ap. 16 to William C. Lunalilo (Lot 2); |
| 2. | 142° 18' | 551.44 | feet along Lot A-18-A-2-A-8, Land Court Application 1053; |
| 3. | 232° 18' | 2,096.03 | feet along the remainder of R. P. 7223, L. C. Aw. 8559-B, Ap. 16 to |

William C. Lunalilo (Lots 8, 7, 6, 2, Ohiohi Street and Lot 1, Ola Hou Estates, Unit 2 and along Lots 5, 4, 3, 2, and 1, Ola Hou Estates, Unit 1);

- | | | | |
|----|----------|--------|---|
| 4. | 319° 44' | 404.27 | feet along Lot 6-B, Kea'au- Pāhoa Road, F. A. S. P. No. S-0130(6); |
| 5. | 304° 04' | 155.38 | feet along Lot 6-B, Kea'au- Pāhoa Road, F. A. S. P. No. S-0130(6) to the point of beginning and containing an area of 26.762 Acres. |

All as shown on the map attached hereto, marked Exhibit "A" and by reference made a part hereof.

SECTION 2. In accordance with Section 25-2-44, Hawai'i County Code 1983 (2016 Edition, as amended), the County Council finds the following conditions are:

- (1) Necessary to prevent circumstances which may be adverse to the public health, safety and welfare; or
- (2) Reasonably conceived to fulfill needs directly emanating from the land use proposed with respect to:
 - (A) Protection of the public from the potentially deleterious effects of the proposed use, or
 - (B) Fulfillment of the need for public service demands created by the proposed use.

SEE ATTACHED CONDITIONS

SECTION 3. Severability. If any provision of this ordinance, or the application thereof to any person or circumstance, is held invalid, the invalidity does not affect other provisions or applications of the ordinance which can be given effect without the invalid provision or

application, and to this end the provisions of this ordinance are severable.

SECTION 4. This ordinance shall take effect upon its approval.

INTRODUCED BY:

COUNCIL MEMBER, COUNTY OF HAWAI'I

_____, Hawai'i

Date of Introduction:

Date of 1st Reading:

Date of 2nd Reading:

Effective Date:

GRAPHIC IMAGES HAWAII, INC.
CHANGE OF ZONE APPLICATION (PL-REZ-2024-000057)
CONDITIONS OF APPROVAL

- A. The applicant(s), its successor(s) or assign(s) (“Applicant”) shall be responsible for complying with all of the stated conditions of approval.
- B. The Applicant shall be responsible for complying with all requirements of Chapter 205, Hawai‘i Revised Statutes, relating to permissible uses within the State Land Use Agricultural District.
- C. Final Subdivision Approval shall be secured within ten (10) years from the effective date of this ordinance.
- D. The Applicant shall remit the required water commitment payment for the additional lots to the Department of Water Supply in accordance with its “Water Commitment Guidelines Policy” within one hundred and eighty (180) days from the effective date of this ordinance. The Applicant is responsible for maintaining valid water commitments to support the proposed development until such time that required water facilities charges are paid in full.
- E. The Applicant shall construct necessary water system improvements as required by the Department of Water Supply, which may include, but not be limited to, 1) extension of the existing water mains capable of delivering water at adequate pressure under peak-flow and fire-flow conditions; the minimum diameter of which shall be 6 inches, 2) service laterals that will accommodate a 5/8-inch meter to each lot, 3) cut and plug existing service lateral to the 1-inch meter currently serving the property, 4) fire hydrants spaced no more than 600 feet apart, and within 300 feet of the driveway or access for each lot. On dead- end streets, the last fire hydrant shall be located at one-half the distance from the last house, or unit, fronting the property line, or to the driveway or access for the property, and 5) subject to other agencies requirements to construct improvements within the road right-of-way fronting the property affected by the proposed development, the application shall be responsible for the relocation and

adjustment of the Department of Water Supply's affected water system facilities, should they be necessary.

- F. The applicant shall construct County-dedicable subdivision roadways, including a 20-foot-wide travel lane and 15-foot-wide, paved shoulders within a 50-foot-wide right-of-way. All such roadways shall be dedicated to the County upon Final Subdivision Approval pursuant to requirements of the Department of Public Works.
- G. The proposed subdivision shall provide for County-dedicable standard roadway stub-outs at its northeast (makai adjoining TMK: 1-6-003:081), southwest (mauka adjoining TMK: 1-6-003:089) and southeast (adjoining TMK: 1-6-003:009) project site boundaries to facilitate future roadway connections with adjoining properties and nearby roadway systems. The northeast (makai) roadway stub-out shall not apply should TMK: 1-6-003:081 (Lot 1-A) be acquired by the Hawai'i Health Systems Corporation (HHSC) for the purpose of developing a proposed medical center.
- H. All development generated runoff shall be disposed of on site and shall not be directed toward any adjacent properties. A drainage study shall be prepared by a professional civil engineer licensed in the State of Hawai'i and submitted to the Department of Public Works. Any recommended drainage improvements, if required, shall be constructed meeting with the approval of the Department of Public Works prior to receipt of Final Subdivision Approval.
- I. All earthwork and grading activity shall conform to Hawai'i County Code Chapter 10, Erosion and Sedimentation Control, and Chapter 27 Flood Control.
- J. A National Pollutant Discharge Elimination System (NPDES) permit and an Underground Injection Control (UIC) permit, if required, shall be secured from the State Department of Health before the commencement of construction activities.
- K. The method of sewage disposal shall meet with the requirements of the State Department of Health.
- L. In the event that surface or subsurface historic resources, including human

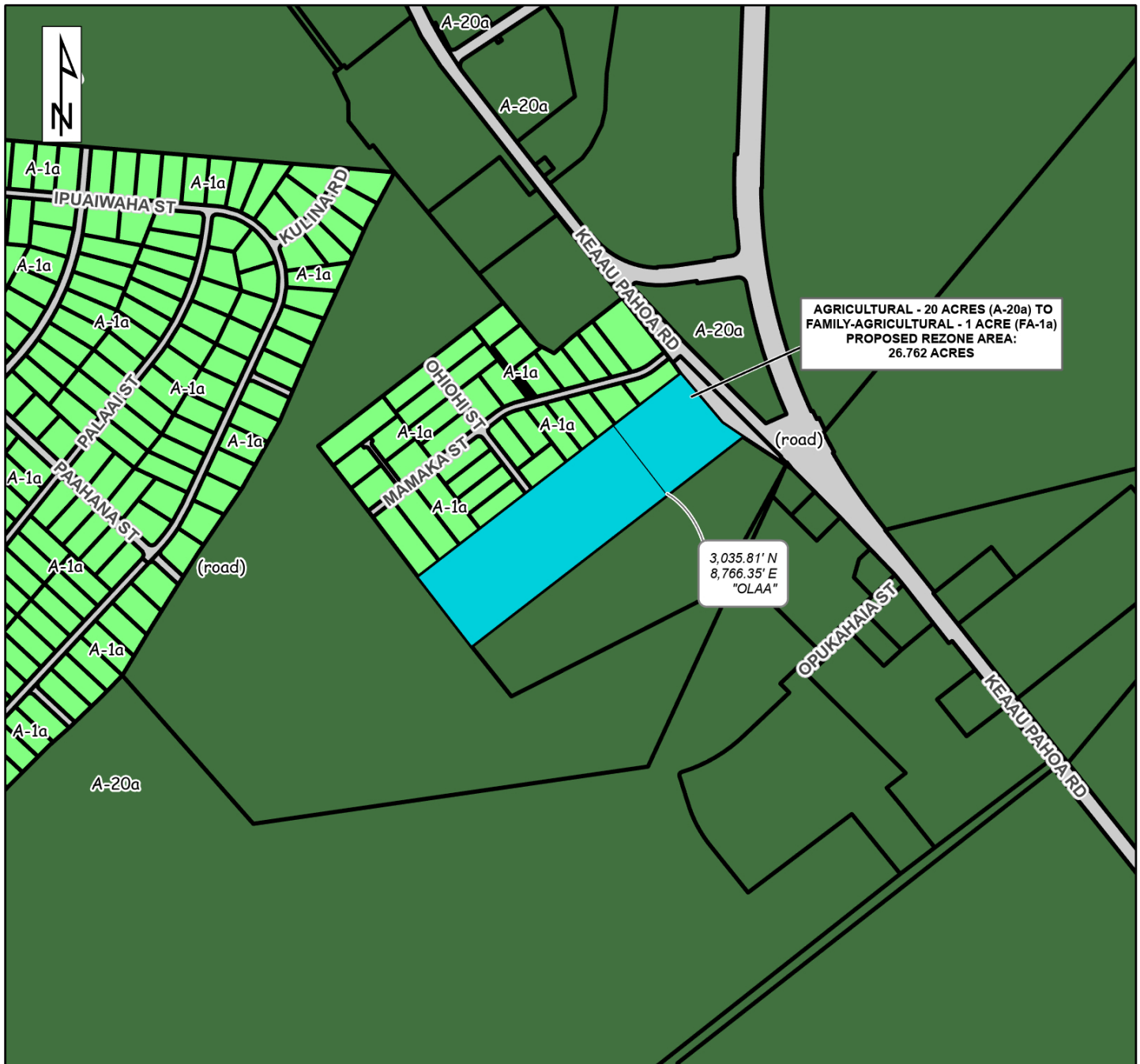
skeletal remains, structural remains (e.g., rock walls, terraces, platforms, etc.), cultural deposits, marine shell concentrations, sand deposits, or sink holes are identified during the demolition and/or construction work, the Applicant shall cease work in the immediate vicinity of the find, protect the find from additional disturbance and contact the State Historic Preservation Division at (808) 933-7651. Subsequent work shall proceed upon an archaeological clearance from DLNR-SHPD when it finds that sufficient mitigation measures have been taken.

- M. Should any state or federally listed or endangered species be found on the subject property, the Applicant shall comply with all applicable requirements of Department of Land and Natural Resources- Division of Forestry and Wildlife and/or the United States Fish and Wildlife Service.
- N. To ensure that the Goals and Policies of the Housing Element of the General Plan are implemented, the applicant shall comply with the requirements of Chapter 11, Article 1, Hawai‘i County Code relating to Affordable Housing Policy. This requirement shall be approved by the Administrator of the Office of Housing and Community Development prior to Final Subdivision Approval.
- O. The Applicant shall make its fair share contribution to mitigate the potential regional impacts of the property with respect to parks and recreation, fire, police, solid waste disposal facilities and roads. The fair share contribution shall become due and payable prior to receipt of Final Subdivision Approval. The fair share contribution for each lot shall be based on the number of lots developed. The fair share contribution may be adjusted annually beginning three years after the effective date of this ordinance, based on the percentage change in the Honolulu Consumer Price Index (HCPI). The fair share contribution shall have a maximum combined value of **\$16,641.15** per single family residential lot. The fair share contribution per single family residential lot shall be allocated as follows:
 - A. **\$8,024.66** per single family residential lot to the County to support park and recreational improvements and facilities;
 - B. **\$387.11** per single family residential lot to the County to support police facilities;

- C. **\$764.59** per single family residential lot to the County to support fire facilities;
- D. **\$334.75** per single family residential lot to the County to support solid waste facilities; and
- E. **\$7,130.04** per single family residential lot to the County to support road and traffic improvements.

In lieu of paying the fair share contribution, the Applicant(s) may contribute land and/or construct improvements/facilities related to parks and recreation, fire, police, solid waste disposal facilities and roads within the region impacted by the proposed development, subject to the review and recommendation of the Planning Director, upon consultation with the appropriate agencies and approval of the County Council pursuant to Section 2-162.1(a) of Hawai‘i County Code.

- P. Should the Council adopt a Unified Impact Fees Ordinance setting forth criteria for imposition of exactions or the assessment of impact fees, conditions included herein shall be credited towards the requirements of the Unified Impact Fees Ordinance.
- Q. The Applicant shall comply with all applicable County, State and Federal Laws, rules, regulations and requirements.
- R. An initial extension of time for the performance of conditions within this ordinance may be requested in accordance with Section 25-2-44, subsections (c) and (d), of the Hawai‘i County Code.
- S. If the Applicant fails to fulfill any conditions of the zone change within the specified time limitations, the Planning Director or County Council may initiate the process for enactment of an ordinance reverting the affected property back to its original zoning designation or a more appropriate zoning designation in accordance with Section 25-2-43 of the Hawai‘i County Code.



AMENDMENT TO THE ZONING CODE

AMENDING SECTION 25-8-22 (PUNA DISTRICT ZONE MAP)
 ARTICLE 8, CHAPTER 25 (ZONING CODE) OF THE
 HAWAII COUNTY CODE 1983 (2016 EDITION AS AMENDED),
 BY CHANGING THE DISTRICT CLASSIFICATION FROM
 AGRICULTURAL - 20 ACRES (A-20a) TO FAMILY-AGRICULTURAL - 1 ACRE (FA-1a)
 AT KEA'AU PUNA, HAWAII

MAP PREPARED BY:
 COUNTY OF HAWAII, PLANNING DEPARTMENT

TMK: (3) 1-6-003:081 and 129

DATE: July 24, 2024

EXHIBIT "A"

Higashi
 Map: 1464