BEFORE THE LAND USE COMMISSION

OF THE STATE OF HAWAII

In the Matter of the Petition of)

THE TRUSTEES UNDER THE WILL AND OF THE ESTATE OF JAMES CAMPBELL, DECEASED

To Amend the Agricultural Land)
Use District Boundary Into Urban)
Land Use District For Approxi-)
mately 63.569 Acres of land at)
Honouliuli, Ewa, Oahu, State of)
Hawaii, Tax Map Key Number)
9-1-14: portion of 2

DOCKET NO. A89-648

THE TRUSTEES UNDER THE WILL AND OF THE ESTATE OF JAMES CAMPBELL, DECEASED

FINDINGS OF FACT,
CONCLUSIONS OF LAW, AND DECISION AND ORDER

BEFORE THE LAND USE COMMISSION OF THE STATE OF HAWAII

In the Matter of the Petition of)

THE TRUSTEES UNDER THE WILL AND OF THE ESTATE OF JAMES CAMPBELL, DECEASED

To Amend the Agricultural Land Use District Boundary Into Urban Land Use District For Approximately 63.569 Acres of land at Honouliuli, Ewa, Oahu, State of Hawaii, Tax Map Key Number 9-1-14: portion of 2

DOCKET NO. A89-648

THE TRUSTEES UNDER THE WILL AND OF THE ESTATE OF JAMES CAMPBELL, DECEASED

FINDINGS OF FACT, CONCLUSIONS OF LAW, AND DECISION AND ORDER

The Trustees Under the Will and of the Estate of James Campbell, Deceased (hereinafter the "Petitioner"), acting in their fiduciary and not in their individual corporate capacities, filed a Petition on August 30, 1989 pursuant to Chapter 205, Hawaii Revised Statutes, as amended ("H.R.S."), and Title 15, Subtitle 3, Chapter 15, Hawaii Administrative Rules, as amended ("Commission Rules") to amend the Land Use District Boundary to reclassify approximately 63.569 acres of land situate at Honouliuli, Ewa, Island of Oahu, State of Hawaii, Oahu Tax Map Number 9-1-14: Portion of 2 (hereinafter the "Property") from the Agricultural District to the Urban District to develop maritime industrial uses which would support commercial activity at the adjoining Barbers Point Harbor. The Land Use Commission (hereinafter the

"Commission"), having heard and examined the testimony and evidence presented during the hearings, the stipulated findings of fact, conclusions of law and decision and order of the Petitioner and the Office of State Planning, hereby makes the following findings of fact:

FINDINGS OF FACT

PROCEDURAL MATTERS

- 1. The Commission conducted a hearing on the Petition on December 15, 1989, pursuant to notice published on November 2, 1989 in the Honolulu Star Bulletin.
- 2. The Commission did not receive any application to intervene in the proceeding. No member of the public appeared to testify at the hearing.
- 3. The Commission received a timely public witness statement from the Department of the Navy dated November 16, 1989, and a letter from Charles T. Ane, Land Agent for the Hawaiian Electric Company, dated November 29, 1989.

DESCRIPTION OF THE PROPERTY

- 4. The Property consists of approximately 63.569 acres on the Ewa Plain on the southwest portion of the Island of Oahu. The Property is located about 20 miles west of Honolulu in the vicinity of the James Campbell Industrial Park, and is immediately south of the State of Hawaii property at the Barbers Point Harbor.
- 5. Development and projects in the surrounding areas include Ko Olina (formerly West Beach) to the north, James

Campbell Industrial Park to the east and south, the Chevron USA, Inc. oil refinery complex, the Naval Air Station at Barbers Point, the proposed 813-acre Kapolei Town Center, Housing Finance and Development Corporation's 888-acre Kapolei Village Project, and the Lusk Company's proposed 80 acre residential development (Kapolei Knolls).

- 6. The Property is currently undeveloped with no existing infrastructure improvements. A large coral stockpile from the dredging of the Barbers Point Harbor occupies the lower third of the Property.
- 7. Petitioner owns the Property in fee. The Property is a portion of lots 4021 (formerly 3155) and 3158, Land Court Application 1069.
- 8. The Property is generally flat (average slopes of 1.0 percent) with a gentle slope towards the ocean. Elevations start at approximately four feet and rise to 30 feet above sea level at the northwest boundary.
- 9. The soil type consists of "coral outcrop" which is cemented calcareous sand derived from coral reefs which existed when the ocean was at a higher level. The majority of the site is coral with the remainder being friable, red soil material in cracks, crevices and depressions.
- 10. Under the Land Capability Classification by the United States Department of Agriculture, Soil Conservation Service ("SCS") the soil has the lowest classification. Under

the Overall Productivity Rating by the Land Study Bureau (LSB) of the University of Hawaii, the Property is rated the lowest level. Under the proposed Land Evaluation and Site Assessment (LESA) System by the State of Hawaii Land of Evaluation Site Assessment Commission, the Property would not be designated as important agricultural land.

DESCRIPTION OF PROPOSED DEVELOPMENT

Barbers Point Harbor. Petitioner proposes to develop the Property for maritime industrial uses to support activities at Barbers Point Harbor. These uses include container storage and bulk handling activities. Petitioner represents that the area will most likely be used as a transshipment station where goods are brought into the harbor and stored in facilities outside the harbor area until they could be packaged or repackaged and shipped from that area. The state land will be used to develop dock and terminal facilities and shore area storage yards. A portion of the state property contains a maintenance and repair shed.

DEVELOPMENT TIMETABLE

12. It is anticipated that the proposed development can be completed within 60 months from the date the land is reclassified from Agricultural to Urban. Following the reclassification, the Property will require a zoning map change and subdivision approval before site preparation can commence.

Once all necessary zoning amendments and permits are obtained, site preparation is expected to require eight months.

Improvements to the Property will consist primarily of providing the necessary infrastructure improvements, including utilities, drainage, road access. The Property will then be leased to commercial tenants who will construct additional improvements, such as warehouses and storage facilities, as needed.

13. The proposed project is timed to coincide with the State's program to have in place by the mid 1990's two piers totalling 1,600 feet in length and an adjoining back up area of 30 acres. The 63.569 acre project proposed by the Petitioner will meet the immediate needs for marine related services as the new piers come on line.

PETITIONER'S FINANCIAL CAPABILITY TO UNDERTAKE THE PROPOSED DEVELOPMENT

- 14. Petitioner estimates the costs to prepare the project site for maritime industrial uses to be about \$12 million dollars, comprising \$8 million dollars onsite and \$4 million dollars offsite.
- 15. Petitioner's financial condition as of
 December 31, 1988, consists of assets of approximately
 \$211,485,485; and Liabilities, Undistributed Income and
 Principal totalling \$211,485,485 which consists of \$99,919,015
 in Principal and \$3,051,315 in Undistributed income.

STATE AND COUNTY PLANS AND PROGRAMS

- 16. The Property is within the State Land Use Agricultural District Boundary as reflected on the Commission's official Map O-6, Ewa.
- 17. The development of waterfront industrial lands in the near vicinity of Barbers Point Harbor is consistent with the State's Honolulu Waterfront Master Plan's goal to provide sufficient space and facilities to meet the functional requirements of Oahu's harbor and maritime needs for the economic welfare of the State.
- 18. The proposed development supports several objectives and policies of the City and County of Honolulu's General Plan and the Development Plan concerning population, economic activity, transportation, utilities, physical development and urban design.
- 19. An amendment to the Ewa Development Plan, Land Use Map (Ordinance No. 89-16, dated February 10, 1989) designates the Property for Industrial Use.
- 20. The Property is zoned AG-2, General Agricultural District by the City and County of Honolulu.
- 21. The Property is not located in the Special Management Area.

NEED FOR THE PROPOSED DEVELOPMENT

22. The project site is intended to serve the needs of harbor related industries. A number of studies have been done by government and private organizations which indicate

that Honolulu Harbor is expected to exceed maximum efficient capacity in the near future. The James Campbell Industrial Park management has had discussions with potential tenants desiring industrial land in close proximity to the new harbor. These uses include support areas for container cargo operations, coal storage, automobile storage, underwater cable and equipment storage, and storage of scrapped automobiles awaiting shipment for recycling.

ECONOMIC IMPACTS

- 23. The proposed development will generate construction employment incident to approximately \$12 million of construction costs. Long term employment has been estimated at 200 workers, or approximately 3 workers per acre.
- 24. The Barbers Point Harbor will be the second commercial port for Oahu, and in concert with Honolulu Harbor, will provide port facilities to meet Oahu's shipping needs for the next 50 years. Because of limited expansion room around Honolulu Harbor, it is expected that a number of water businesses currently in Honolulu wishing to expand or to reduce operating costs will relocate to Barbers Point Harbor area. Petitioner's proposed project will provide maritime industrial sites for the Barbers Point Harbor.

IMPACT UPON RESOURCES OF THE AREA

Agricultural Lands

25. Reclassification of the Property from
Agricultural District to Urban District will have negligible

impact on current or future agricultural activity. The extremely poor agricultural quality of the soil is indicated by its low rating on the four classification systems used in Hawaii.

Vegetation and Animal Life

26. The Property has no vegetation and there are no known rare or endangered species of wildlife inhabiting the Property.

Historic and Archaeological Resources

27. There are no known archaeological features on the Property. The Property has recently been cleared and grubbed and no archaeological remains were found.

Unique and Natural Features

28. There are no unique natural features on the Property. The Property is flat with coral as the basic soil type.

Open Space

29. The Property does not possess any unusual open space qualities. It is a barren coral shelf with no inherent characteristics that warrant preserving the Property as a natural open space resource.

ENVIRONMENTAL QUALITY

Noise

30. Noise will be generated as a result of construction activities associated with site preparation and

from the operation of the industrial users. No unusual construction noise is expected since the Property is free of structures which would require demolition. Industrial users are not anticipated to create unusual noise. The Property will be used primarily for storage related to the harbor activities. Air Quality

impacts on air quality. During construction, site grading will create dust which can be mitigated by wetting down procedures. In addition, heavy equipment required for site preparation will emit diesel fumes. Long term impacts on air quality will occur as a result of introduction of traffic pollutant emissions generated by vehicle traffic to and from the Property. However, since the Property is on the leeward side of the island and adjacent to the ocean, carbon monoxide emissions from vehicles should be easily disbursed by trade winds. Air quality will conform to state and national air quality standards.

Hazardous Waste

32. Petitioner represents that all of its leases have strict requirements for the management of hazardous waste. Petitioner will comply or will require its tenants to comply with lease conditions, covenants, and reservations that are imposed to insure that all Federal, State and County conditions are met regarding hazardous waste.

Compatibility with Surrounding Environment

- 33. The proposed industrial project will be compatible with surrounding environment. The Property adjoins the state land serving the Barbers Point Harbor and will be available for maritime users. The Property is within the vicinity of the James Campbell Industrial Park, the Chevron Oil Refinery, and the State of Hawaii maintenance and repair shop. The Property is ideally situated to provide space for container storage or other bulk handling needs.
- 34. The Property is adjacent to the Naval Air Station at Barbers Point, and is within an area where tall structures, such as towers could be a hazard to Navy air operations. The Navy has requested that no structures which exceed 197 feet in height be permitted in the petition area.
- 35. Petitioner represented that the 197 feet height limitation is compatible with the proposed uses, and that it is aware of the overflight requirements of the Navy and of the Federal Aviation Administration (FAA). Petitioner represents that the only time there would be a necessity for cranes in the area would be during construction of some of the improvements that the tenants might require. Petitioner proposes to advise prospective tenants of the need to advise the FAA and Barbers Point Naval Air Station of a temporary crane in the area.
- 36. The Navy has represented that the proposed industrial development is located approximately between the

55-60 Ldn noise contours and is compatible with the Navy's Air Installations Compatible Use Zones land use guidelines pertaining to noise exposure.

ADEQUACY OF PUBLIC SERVICE AND FACILITIES

Roadway and Highway Services and Facilities

- 37. The Property is accessed by Malakole Road west of Kalaeloa Boulevard. Kalaeloa Boulevard is a divided roadway from the Palailai interchange with the H-1 freeway, to just south of its intersection with Malakole Road and it is currently the only access into Campbell Industrial Park. Kalaeloa Boulevard consists of two lanes in each direction. Petitioner originally projected that it would take about six years to remove the portion of the coral stockpile that was encumbering the southwest portion of the Property and interfering with access from Malakole Road. Petitioner states that it is using that area of the stockpile faster than originally projected, and that by the time all the land planning and land use changes are completed, that portion of the coral stockpile will be completely removed. There will be no problem with access from Malakole Road.
- 38. Petitioner's traffic study concludes that "while project traffic contribution is relatively small, improvements to Kalaeloa Boulevard will be needed as the Campbell Industrial Park continues to expand."

The State Department of Transportation notes the following comments:

"Malakole Road has a limited drainage system, designed only to handle local runoffs;

Future improvements to the Malakole Road and Kalaeloa Boulevard intersection may include signalization;

Roadway improvements should be coordinated with the Ewa Highway Master plan."

The Office of State Planning believes that Petitioner should, in the event that the petition is approved, comply with the recommendations contained in the Ewa Highway Master Plan being developed, including committing to those roadway improvements as may be required by the Ewa Highway Master Plan. Water Service

39. The James Campbell Industrial Park is provided water by the Board of Water Supply. The closest pipeline to the project is a 20-inch main in Malakole Road, which terminates approximately 3,500 feet from the project site. Distribution lines will be extended to serve the project. The existing transmission mains were designed to accommodate the Property and the proposed Kapolei Business-Industrial Park, adjacent to the east. The entire off-site water system, including source, storage and transmission will be adequate to handle the initial phases of the Property.

Wastewater Disposal

40. The Kapolei Business-Industrial park, including the Property, will ultimately be serviced by an underground sewer system discharging to the Honouliuli Wastewater Treatment

Plant. The Property itself is expected to generate an average wastewater flow of approximately 0.18 million gallons per day (mgd) with a peak flow of approximately 0.84 mgd. Currently the Honouliuli Wastewater Treatment Plant is operating near its 25 mgd capacity. A plant expansion to a 38 mgd capacity is currently being designed and expected to be completed by 1994. In the event the plant expansion is not completed before the proposed Business-Industrial Park requires sewage treatment service, temporary treatment facilities will be implemented and coordinated with the Department of Health.

Flood Control and Area Drainage

41. An on-site drainage system consisting of catchbasins, manholes and pipe culverts will be installed to collect runoff generated on-site and to convey it to the major drainage channel proposed to serve much of the proposed Kapolei Business-Industrial Park.

This main drainage channel will be designed to accommodate runoff from a watershed encompassing approximately 2,400 acres, extending to the crest of the Waianae Mountain Range. Peak runoff from this watershed will be approximately 5,000 cubic feet per second (cfs), but this condition is not expected to occur in the near future. The channel can be initially excavated to accommodate the existing pipe culverts, and then be incrementally increased as the proposed Business-Industrial Park and the mauka watershed develop.

Solid Waste Disposal

42. Solid waste will be collected and disposed by private collection services. The area is in close proximity to the H-Power Plant and the Waimanalo Gulch landfill facility. Both facilities are expected to be in operation prior to the development of the Property.

Police Protection

43. Police protection for the James Campbell Industrial Park is provided by the Pearl City Police Substation. The proposed development will not substantially increase the need for added staffing as it is anticipated that industrial users will provide their own security measures. A new police station will be located in Kapolei on land provided by the Petitioner.

Fire Protection

44. The Makakilo and Nanakuli fire stations are, respectively, four and seven miles from the Property. The Ewa Development Plan Public Facilities Map indicates an undetermined site for a fire station in the area of the Property. The fire station is proposed for construction within six years. The land will be provided by the Petitioner.

Electrical and Telephone Service

45. Overhead power and communication lines currently run along Malakole Road. Electrical and telephone service are available in the James Campbell Industrial Park and can be extended to serve the Property.

CONFORMANCE WITH THE HAWAII STATE PLAN

46. The proposed reclassification of the Property addresses the following goals, objectives, policies and priority guidelines of the Hawaii State Plan, Chapter 225, H.R.S.:

Section 226-6(b)(6)

Strives to achieve a level of construction activity responsive to, and consistent with, State growth objectives; Section 226-17(b)(4)

Provides for improved accessibility to shipping, docking, and storage facilities;

Section 226-17(b)(8)

Increases the capacities of airport and harbor systems and support facilities to effectively accommodate transshipment and storage needs;

Section 226-103(d)(5)

Encourages and assists with the development of a waterborne and airborne freight and cargo system capable of meeting the needs of Hawaii's agricultural community;

Section 226-104(b)(2)

Makes available marginal or non-essential agricultural lands for appropriate urban uses while maintaining agricultural lands of importance in the agricultural district.

COASTAL ZONE MANAGEMENT

47. The Property is not within the Special Management Area (SMA), and the proposed development will not adversely affect any coastal zone management objectives or policies.

CONFORMANCE WITH LAND USE POLICIES OF THE CITY AND COUNTY OF HONOLULU

48. This proposed reclassification responds to the City and County of Honolulu's recognition that urban Honolulu has limited growth potential and is becoming increasingly congested. The City and County of Honolulu has designated Ewa as Oahu's secondary urban center in the General Plan. The proposal to develop 63.569 acres for maritime industrial use supports the following objectives of the General Plan:

<u>Population</u>: Encourages the development of a secondary urban center in the West Beach-Makakilo area to relieve developmental pressures in the urban-fringe and rural areas.

Economic Activity: Encourages the growth and diversification of Oahu's economic base; encourage the development in appropriate locations on Oahu of trade, communications, and other industries of nonpolluting nature; encourage the development of ocean-related industries; maintain sufficient land in appropriately located commercial and industrial areas to help ensure a favorable business climate on Oahu.

Transportation and Utilities: Facilitates the development of a second deepwater harbor to relieve congestion in Honolulu Harbor.

Physical Development and Urban Design: Provides for more compact development and intensive use of urban lands where compatible with the physical and social character of existing communities; locate new industries and new commercial areas so that they will be well related to their markets and suppliers, and to residential areas and transportation facilities; encourage the development of a major residential, commercial, and employment center within the secondary urban center; encourage the continuing development of Barbers Point as a major industrial center; cooperate with the State and Federal governments in the development of a deepwater harbor at Barbers Point.

49. The Ewa Development Plan, Land Use Map was amended on February 10, 1989 (Ordinance No. 89-16) to designate the Property for industrial use. The City's development policy for the Property already reflects the Petitioner's requested industrial use.

CONFORMANCE WITH URBAN DISTRICT STANDARDS

50. The proposed reclassification conforms with the Urban District Standards set forth in Hawaii Land Use Commission Rules, Section 15-15-18. The proposed maritime industrial uses are consistent with an "urban" character, the Property is located in proximity to an industrial park, a

harbor, and employment centers, and is of suitable topography for industrial uses.

DEVELOPMENT TO BE SUBSTANTIALLY COMPLETE WITHIN 5 YEARS

51. It is expected that development of the Property will be completed before five years after the date of final county zoning approval.

RULING ON STIPULATED PROPOSED FINDINGS OF FACT

Any of the stipulated proposed findings of fact submitted by the Petitioner or the other parties not already ruled upon by the Commission by adoption herein, or rejected by clearly contrary findings of fact herein, are hereby denied and rejected.

Any conclusion of law herein improperly designated as a finding of fact should be deemed or construed as a conclusion of law; any finding of fact herein improperly designated as a conclusion of law should be deemed or construed as a finding of fact.

CONCLUSIONS OF LAW

Pursuant to Chapter 205 of the Hawaii Revised

Statutes, as amended, and the Commission Rules, the Commission

finds upon a preponderance of evidence that the

reclassification of the Property, as approximately shown on

Exhibit "A" attached hereto and incorporated herein by

reference, consisting of approximately 63.569 acres of land

situate at Honouliuli, Ewa, Island of Oahu, State of Hawaii,

identified as Oahu Tax Map Key Nos.: 9-1-14: portion of 2,

from the Agricultural District to the Urban District, subject to the conditions in the Order, is reasonable, not violative of Section 205-2, Hawaii Revised Statutes, as amended, and is consistent with the Hawaii State Plan set forth in Chapter 226, Hawaii Revised Statutes, as amended, and with the criteria established pursuant to §205-16, 205-17, and Chapter 205A, Hawaii Revised Statutes as applicable.

ORDER

IT IS HEREBY ORDERED that the Property, consisting of approximately 63.569 acres, being the subject of Docket Number A89-648 by the Trustees Under the Will and of the Estate of James Campbell, Deceased, situated at Honouliuli, Ewa, Island of Oahu, State of Hawaii, identified as Oahu Tax Map Key 9-1-14: portion of parcel 2, and approximately identified on Exhibit "A", attached hereto and incorporated by reference herein, shall be and hereby is reclassified from the Agricultural District to the Urban District, subject to the following conditions:

- 1. Petitioner shall develop the subject Property for maritime industrial uses in support of and compatible with activities at Barbers Point Harbor in substantial compliance with the representations made before the Commission.
- 2. Petitioner shall provide its pro rata share in the funding and construction of present and future transportation improvements as outlined in the proposed Ewa

Highway Master Plan and by the State Department of Transportation.

- 3. Petitioner shall fund and construct the project's wastewater disposal systems acceptable to the State Department of Health.
- 4. Petitioner shall provide water source and transmission to service the subject project.
- 5. Petitioner shall provide drainage improvements in the Property and shall coordinate off-site improvements with adjoining landowners and developers and/or other federal, State, or City agencies.
- 6. Petitioner shall dispose of any hazardous or noxious waste generated by the proposed project in accordance with Federal and State guidelines and shall fund mitigation measures, should adverse impacts occur.
- 7. Petitioner shall participate in an air quality monitoring program as specified by the State Department of Health.
- 8. Petitioner shall provide its equitable pro rata share for police and fire facilities based on such public service needs directly emanating from Petitioner's development of the subject Property.
- 9. Petitioner shall immediately stop work and contact the State Historic Preservation Office should any archaeological resources such as artifacts, shell, bone or

charcoal deposits, human burial, rock or coral alignments, paving or walls be encountered during the project's development.

- 10. Petitioner shall coordinate with the Department of Navy to assure that development of the subject Property will be compatible to the operations of Barbers Point Naval Air Station.
- 11. Petitioner shall notify the Commission of any intent to sell, lease, assign, place in trust, or otherwise voluntarily alter the ownership interest in the Property prior to visible commencement of construction of the Property.
- 12. Petitioner shall provide annual reports to the Land Use Commission, The Office of State Planning and the City and County of Honolulu, Department of General Planning in connection with the status of the project and Petitioner's progress in complying with the conditions imposed.
- 13. The Commission may fully or partially release these conditions as to all or any portion of the Property upon timely motion, and upon the provision of adequate assurance of satisfaction of these conditions by the Petitioner.

DOCKET NO. A89-648 - THE TRUSTEES UNDER THE WILL AND OF THE ESTATE OF JAMES CAMPBELL, DECEASED

Done at Honolulu, Hawaii, this <u>22nd</u> day of March 1990, per motions on March 14, 1990 and March 20, 1990.

LAND USE COMMISSION STATE OF HAWAII Chairman and Commissioner FREDERICK P. WHITTEMORE Vice Chairman and Commissioner By Jamence 7. C LAWRENCE F. CHUN Commissioner By SHARON R. HIMENO Commissioner By ALLEN K. HOE Commissioner By Commissioner EUSEBIO LAPENIA Commissioner Ву JAMES M. SHINNO /Commissioner

By

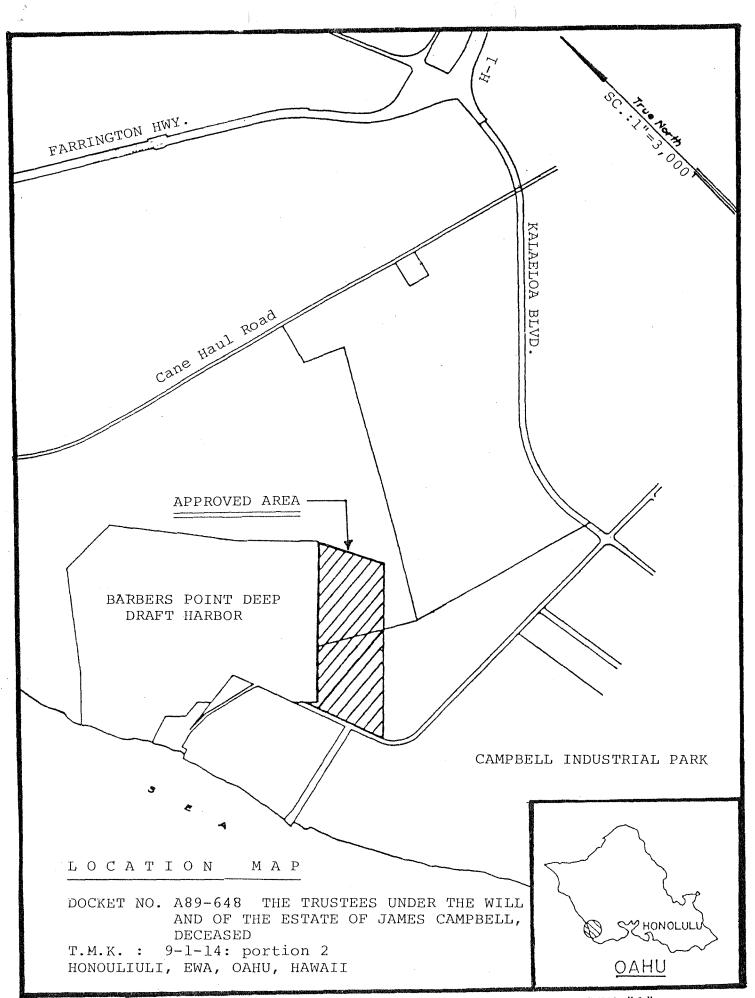
ELTON WADA Commissioner

Filed and effective on

Executive Officer

Certified by:

March 22 , 1990



BEFORE THE LAND USE COMMISSION

OF THE STATE OF HAWAII

In the Matter of the Petition of)

THE TRUSTEES UNDER THE WILL AND OF THE ESTATE OF JAMES CAMPBELL,

DECEASED

To Amend the Agricultural Land Use District Boundary Into Urban) Land Use District For Approximately 63.569 Acres of land at Honouliuli, Ewa, Oahu, State of Hawaii, Tax Map Key Number 9-1-14: portion of 2

DOCKET NO. A89-648

THE TRUSTEES UNDER THE WILL AND OF THE ESTATE OF JAMES CAMPBELL, DECEASED

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Findings of Fact, Conclusions of Law, and Decision and Order was served upon the following by either hand delivery or depositing the same in the U. S. Postal Service by certified mail:

> HAROLD S. MASUMOTO, Director Office of State Planning State Capitol, Room 410 Honolulu, Hawaii 96813

BENJAMIN B. LEE, Chief Planning Officer Department of General Planning

City and County of Honolulu CERT.

650 South King Street Honolulu, Hawaii 96813

IVAN LUI-KWAN, ESQ., Attorney for Petitioner CERT.

Carlsmith, Wichman, Case, Mukai & Ichiki

2200 Pacific Tower 1001 Bishop Street

Honolulu, Hawaii 96813

DATED: Honolulu, Hawaii, this 22nd day of March 1990.

> ESTHER UEDA Executive Officer

DOCKET NO. A89-648 - THE TRUSTEES UNDER THE WILL AND OF THE ESTATE OF JAMES CAMPBELL, DECEASED

A copy of the Land Use Commission's Findings of Fact, Conclusions of Law, and Decision and Order was served upon the following by regular mail on March 22, 1990.

MR. DAVID W. RAE Campbell Estate 828 Fort Street Mall Suite 300 Honolulu, Hawaii 96813