



December 19, 2025

VIA U.S. MAIL AND EMAIL DBET.LUC.WEB@HAWAII.GOV

Mr. Daniel Orodener
Executive Officer
Land Use Commission
State of Hawaii
P.O. Box 2359
Honolulu, HI 96804

Re: State Land Use Commission Docket No. A04-747
Petitioner: Kamehameha Investment Corporation
Subject: Comprehensive Annual Report 2014 - 2025 per Condition No. 21
Tax Map Key Nos. (3) 7-8-005:001, 006, 027, and 7-8-007:004,
7-8-010:006 and 009; N. Kona, Hawaii

Dear Mr. Orodener:

This letter will serve as a response to your letter to Kamehameha Investment Corporation ("**KIC**") dated September 5, 2025 informing KIC that the annual reports required for submittal to the State Land Use Commission ("**Commission**") pursuant to Condition No. 21 of the Findings of Fact ("**FOF**"), Conclusions of Law, and Decision and Order under Docket No. A04-747, filed on August 1, 2005 ("**A04-747 Decision and Order**") pertaining to the above-referenced properties (the "**Properties**"), were delinquent.

KIC sincerely apologizes for the inadvertent failure to submit the annual reports. Future annual reports will be filed in a timely fashion. A summary of each stated condition of the A04-747 Decision and Order is attached hereto for your review.

Please note that the Tax Map Key ("**TMK**") numbers listed in your September 5, 2025 letter included TMK Nos. (3) 7-8-005-007, -028, -037 and -038. However, TMK No. (3) 7-8-005-007 does not exist; we believe the proper reference should be (3) 7-8-005-001 and thus, we included that parcel in this report. Additionally, TMK Nos. (3) 7-8-005-028, -037 and -038 (and -039, which was not listed in the September 5, 2025 letter) were excluded from the boundary

amendment by agreement in the A04-747 Decision and Order, and thus this response does not address those properties. *See* A04-747 Decision and Order, FOF 18 and n.3.

As background, the Properties were a part of a much larger Keauhou master planned project area that was originally conceived in the 1970s, spanning over 2,000 acres and covering the entire ahupua'a of Kahalu'u, Keauhou 1st and 2nd, makai (west) of Kuakini Highway. The Keauhou project area was envisioned at the time as a mixed use development consisting of ample residential, commercial, recreational and educational opportunities, fully integrated within a resort-type setting.

On December 26, 2000, Special Management Area Use Permit No. 413 ("SMA 413") and Use Permit No. 183 ("USE 183") were issued by the County of Hawaii for the development of a new 27-hole golf course, driving range, clubhouse, related maintenance support facilities, and associated improvements and infrastructure. The A04-747 Decision and Order reclassifying approximately 455.746 acres from the State Land Use Agricultural District to the State Land Use Rural District was primarily for the development of a single-family residential subdivision which incorporated the permitted golf facilities and related amenities.

While a substantial amount of archaeological work was completed for the Properties, Kamehameha Schools ("KS") has not developed the golf course project set forth in SMA 413 and USE 183.

As the years passed, the KS leadership team sought to sharpen the focus of the Keauhou master plan by placing more of an emphasis on development within Keauhou that serves to enhance the area's rich historical and cultural significance. To this end, in 2013, KIC, as the for-profit subsidiary of KS, consolidated some of the day-to-day land management activities in West Hawaii to allow for direct control and management of these assets under KS. This reorganization was intended to facilitate a more holistic approach for KS to plan and implement even more educational, cultural and community programs and activities within the region, including Keauhou.

As you are aware, the implementation of a master plan of this scale requires a significant level of time and resources to ensure that each project element is carefully evaluated, designed, and deployed. Despite having to navigate multiple economic recessions, in addition to other significant events that ultimately affected KS's ability to find partners on a few of the remaining undeveloped land areas within Keauhou, we continue to push forward to carry out the vision for a cohesive mixed use development harmonious with the historical and cultural foundations of the area.

More recently, KS has focused its efforts on the closure (2013) and demolition of the Keauhou Beach Hotel (2017-2019) and redevelopment of the Kahalu'u Ma Kai educational center (2019-2023), in addition to working with numerous area stakeholders to develop a master plan to guide sensible redevelopment along Keauhou Bay (2016-present). Although our present focus is on these other important areas within Keauhou, the Properties remain a component of the Keauhou master plan despite being in an undeveloped state. KS is currently analyzing and

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re-evaluating its plans for the area, and at this time it is premature to indicate whether its renewed plans will include the golf course project.

Please let us know if you need further information or have any questions.

Sincerely,



Benjamin Salazar
President

cc: State Office of Planning and Sustainable Development
County of Hawaii Planning Department
encl.

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