

IN THE CIRCUIT COURT OF THE THIRD CIRCUIT

STATE OF HAWAI'I

REBECCA MELENDEZ,

Petitioner,

v.

KAMEHAMEHA SCHOOLS (BISHOP ESTATE); HAWAII COUNTY PLANNING, JEFF DARROW
IN HIS OFFICIAL CAPACITY AS DIRECTOR; MARISSA HARMAN, IN HER PROFESSIONAL &
OFFICIAL CAPACITY; G70; KAWIKA MCKEAGUE, IN HIS OFFICIAL CAPACITY; JANE DOES 1-
20; DOE ENTITIES 1-20; DOE GOVERNMENT ENTITIES 1-20,

Respondents.

Civil No. 3CCV-25-0000438

(Declaratory Judgment)

PETITIONER'S NOTICE OF SUPPLEMENTAL FILING REGARDING RESPONDENTS G70 AND
KAWIKA MCKEAGUE'S JULY 16, 2026 ERRATA

CERTIFICATE OF SERVICE

JUDGE: Honorable Kauano Jackson

TRIAL DATE: None

**Electronically Filed
THIRD CIRCUIT
3CCV-25-0000438
24-JUL-2026
09:44 AM
Dkt. 118 NTCE**

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JUL 24 2026

**PETITIONER'S NOTICE OF SUPPLEMENTAL FILING REGARDING RESPONDENTS G70
AND KAWIKA MCKEAGUE'S JULY 16, 2026 ERRATA**

Petitioner Rebecca Melendez, appearing pro se, respectfully submits this Notice of Supplemental Filing to bring correspondence dated July 16, 2026 to the Court's attention. The correspondence was issued by Respondent G70 and signed by Respondent Mark Kawika McKeague, President of G70. Petitioner received this correspondence by email on July 23, 2026. A true and correct copy is attached as Exhibit 1.

**I. THE ERRATA CONFIRMS AN OMISSION PREVIOUSLY ALLEGED IN THE FIRST
AMENDED PETITION**

On July 23, 2026, Petitioner received an email from G70 Planning stating that "[n]otice of this errata will be published in The Environmental Notice on July 23, 2026," with an attached letter dated July 16, 2026, signed by Respondent Mark Kawika McKeague. The attached letter states that "six pages from Chapter 2, Purpose and Need for the Project, were inadvertently omitted" from the published FEIS, and that those pages "are reproduced in full as part of the errata and incorporated into the public record."

Petitioner's First Amended Petition, at pages 30-31, previously alleged that Chapter 2 content was missing from the publicly available FEIS and that the published FEIS repeatedly referenced Section 2.7 even though those pages did not appear in the publicly available document. The July 16, 2026 letter confirms that six pages were omitted from the published FEIS.

II. THE JULY 16, 2026 CORRESPONDENCE IS RELEVANT TO THE PENDING MOTION FOR RECONSIDERATION

The July 16, 2026 correspondence is signed by Respondent Mark Kawika McKeague, President of Respondent G70, and concerns the same Final Environmental Impact Statement ("FEIS") that is the subject of this judicial review proceeding. The correspondence was issued after Petitioner filed the pending Motion for Reconsideration (Docket 111), which contends that Mr. McKeague personally signed and submitted statements regarding the FEIS to governmental authorities, including statements concerning its legal compliance and completeness, and that those personally signed statements are central to Petitioner's request that the Court reconsider its dismissal of Respondents G70 and Mr. McKeague.

III. THE SUPPLEMENTAL FILING IS PROVIDED TO COMPLETE THE RECORD

Respondent G70 was the preparer of both the DEIS and the FEIS for the Project, and the July 16, 2026 letter is Respondent G70's own account of its own work on both documents. Petitioner's Motion for Reconsideration (Docket 111) centers on this same fact — that Respondent McKeague personally signed and submitted statements regarding the FEIS's legal compliance and completeness on Respondent G70's behalf. The July 16, 2026 letter, like the original FEIS transmittal letter, bears Respondent McKeague's personal signature as President of Respondent G70. Petitioner submits that Respondent McKeague's signature, under his own name and title, appears on both the original FEIS transmittal letter and the July 16, 2026 errata correspondence concerning the same FEIS.

Petitioner further notes that the original FEIS transmittal letter, dated August 26, 2025, is signed "Mark Kawika McKeague, AICP," while the July 16, 2026 errata letter is signed "Mark Kawika McKeague, FAICP." Both letters are signed by the same individual, in the same role as President of Respondent G70, regarding the same FEIS. Petitioner submits that this is relevant because it shows that Respondent McKeague has continued, across nearly a year and across two separate official communications concerning the FEIS at issue in this proceeding, to sign such communications under his own name and his own professional credentials.

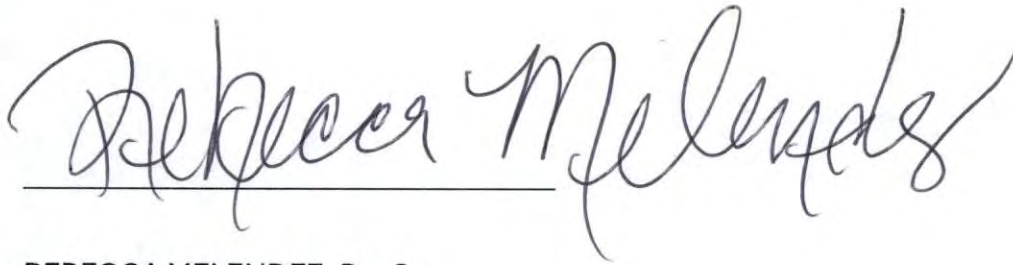
Petitioner submits this correspondence so that the Court has the complete and current record before it while Petitioner's Motion for Reconsideration remains pending, and

because it concerns issues already raised in the First Amended Petition and Motion for Reconsideration.

IV. CONCLUSION

Petitioner respectfully submits this Notice so that the Court has the complete and current record before it in connection with Petitioner's pending Motion for Reconsideration and the underlying judicial review proceeding.

DATED: Kailua-Kona, Hawai'i, 724, 2026.

A handwritten signature in cursive script, reading "Rebecca Melendez", written over a horizontal line.

REBECCA MELENDEZ, Pro Se

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was duly served upon the following parties by depositing the same in the United States mail, postage prepaid, on 7-24, 2026:

CALVERT G. CHIPCHASE, ESQ.

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Honolulu, Hawai'i 96813

Attorneys for Respondents Trustees of the Estate of Bernice Pauahi Bishop dba

Kamehameha Schools and Marissa Harman

SHERILYN K. TAVARES, ESQ.

Deputy Corporation Counsel

Office of the Corporation Counsel

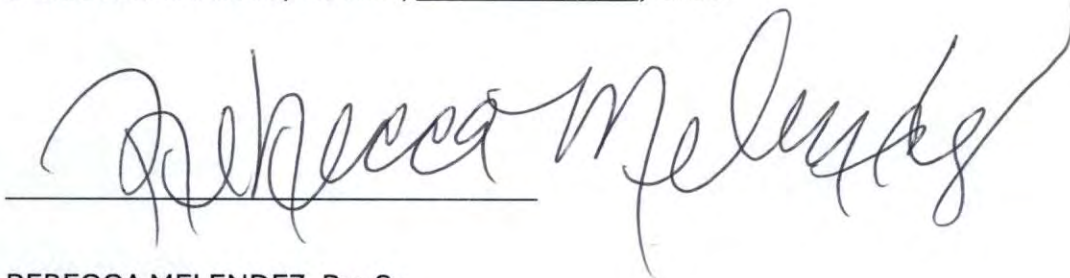
County of Hawai'i

101 Aupuni Street, Suite 325

Hilo, Hawai'i 96720

Attorney for Respondent County of Hawai'i

DATED: Kailua-Kona, Hawai'i, 7-24, 2026.

A handwritten signature in cursive script, reading "Rebecca Melendez", is written over a horizontal line. The signature is fluid and extends to the right of the line.

REBECCA MELENDEZ, Pro Se

EXHIBIT 1

This exhibit is a true and correct copy of the July 16, 2026 letter issued by Respondent G70 and signed by Respondent Mark Kawika McKeague, President of G70, on behalf of Kamehameha Schools, regarding an errata to the Final Environmental Impact Statement for the Keauhou Bay Management Plan. Petitioner received this letter, and the email to which it was attached, on or about July 23, 2026.

Final Environmental Impact Sta

mail.google.com/mail/u/2/#inbox/FMfcgzQhYX8mCpPmvzstvnWfJLhQwJK

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Ask Gemini

Search mail

Upgrade

Compose

Inbox1,027

Starred

Snoozed

Sent

Drafts187

Purchases63

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Labels

About Meetings

Comment Letters

Emails from Site

Environment Reviews

General Plan Info

Island Emails

Keauhou Bay

Lamaku

Personal

Final Environmental Impact Statement Errata for the Kamehameha Schools Keauhou Bay Management Plan

221053-01 KS Keauhou Entitlements

to

Thu, Jul 23, 8:41 AM (23 hours ago)

Dear Participant:

On behalf of Kamehameha Schools, G70 is providing this courtesy notice regarding the publication and availability of an errata to the Final Environmental Impact Statement (FEIS) for the Keauhou Bay Management Plan, located in Keauhou, Hawai'i Island, Hawai'i.

Please see the attached notice for information. Notice of this errata will be published in The Environmental Notice on July 23, 2026.

Sincerely,
G70 Planning

[Message clipped] [View entire message](#)

One attachment • Scanned by Gmail • [Add to Drive](#)

G70

Reply

Forward

3 of 1,898

8:04 AM

7/24/2023



111 S. King Street July 16, 2026

Suite 170

Honolulu, HI 96813

808.523.5866

www.g70.design

Subject: Kamehameha Schools, Keauhou Bay Management Plan
Final Environmental Impact Statement Errata
Tax Map Keys (3) 7-8-012:098; (3) 7-8-012:101; (3) 7-8-012:048; (3) 7-8-010:044; (3) 7-8-012:027; (3) 7-8-012:004; (3) 7-8-012:013; (3) 7-8-012:014; (3) 7-8-012:054; (3) 7-8-012:061; (3) 7-8-012:065; (3) 7-8-012:007; (3) 7-8-010:049; (3) 7-8-012:103
Keauhou, Island of Hawai'i, Hawai'i

Dear Participant:

On behalf of Kamehameha Schools, G70 is providing this courtesy notice regarding the publication and availability of an errata to the Final Environmental Impact Statement (FEIS) for the Keauhou Bay Management Plan, located in Keauhou, Hawai'i Island, Hawai'i. The FEIS was published in *The Environmental Notice* on September 8, 2025. The County of Hawai'i Planning Department, serving as the accepting authority, published its notice of acceptance of the FEIS on September 23, 2025.

Notice of this errata will be published in *The Environmental Notice* on July 23, 2026. The errata will be available on the Environmental Review Program's website at the link below:

[The Environmental Notice | Environmental Review Program](#)

The errata corrects a clerical error in the published version of the FEIS, in which six pages from Chapter 2, *Purpose and Need for the Project*, were inadvertently omitted. Those pages are reproduced in full as part of the errata and incorporated into the public record.

The inadvertently omitted pages were included in the Draft Environmental Impact Statement (DEIS) and were available to the public for review and comment during the 45-day DEIS public comment period. There were no substantive changes to these six pages between the DEIS and FEIS.

The omitted six pages were also included in the FEIS submitted to the County of Hawai'i Planning Department for review and acceptance and formed part of the FEIS considered by the County in making its acceptance determination. Accordingly, incorporation of these pages into the public FEIS record does not alter the environmental analysis, mitigation measures, findings, conclusions, or acceptance of the FEIS.

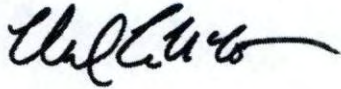
July 16, 2026

Page 2 of 2

Thank you for your participation throughout the environmental review process.

Sincerely,

GROUP 70 INTERNATIONAL, INC., dba G70

A handwritten signature in black ink, appearing to read 'Mark Kawika McKeague', with a stylized flourish at the end.

Mark Kawika McKeague, FAICP
President

cc:
Mr. Alex Roy, Planning Department