

IN THE CIRCUIT COURT OF THE THIRD CIRCUIT

STATE OF HAWAI‘I

DAISY MITCHELL and REBECCA MELENDEZ,

Petitioners,

vs.

KAMEHAMEHA SCHOOLS (BISHOP ESTATE), HAWAI‘I COUNTY PLANNING
DEPARTMENT,
JEFF DARROW, G70, KAWIKA MCKEAGUE, and MARISSA HARMAN,

Respondents.

Civil No. 3CCV-25-0000438

**DECLARATION OF REBECCA MELENDEZ IN SUPPORT OF HER STANDING
AS A PETITIONER**

June 1, 2026

I, Rebecca Melendez, submit this declaration in support of my standing as a Petitioner in the above-captioned matter. I have a longstanding, continuous, and deeply personal connection to Keauhou Bay — as a resident of many years, and as a maritime worker who has called this bay home professionally since the late 1990s.

**I. MY RESIDENCE AT 78-7108 KAMEHAMEHA III ROAD (APPROXIMATELY 2012 –
AUGUST 2025)**

From approximately 2012 until August 2025, I lived at 78-7108 Kamehameha III Road (also recorded in various documents as 78-7108 A King Kamehameha III Rd. and 78-7108 King Kamehameha III Rd. #A), Kailua Kona, HI 96740. This address sits at the base of Kamehameha III Road, directly on Keauhou Bay.

I did not leave voluntarily or by choice. The family who owned the property needed the studio unit for a granddaughter who had grown up and was ready to live on her own. I vacated the unit in approximately August 2025. My departure was a matter of family circumstance — not a diminishment of my connection to the bay or my stake in this proceeding.

My address at 78-7108 Kamehameha III Road during that period is confirmed by Amazon shipping records. Attached as Exhibit D-1, Exhibit D-2, and Exhibit D-3 are screenshots from my Amazon order history for the years 2016, 2020, and 2025, each showing orders shipped to 78-7108 Kamehameha III Road. Attached as Exhibit D-4 is a 2014 Amazon order showing my P.O. Box address, demonstrating that both addresses were active in my account simultaneously, which explains the zip code discrepancy discussed below. These records establish that I maintained this address continuously for over a decade — from approximately 2012 through August 2025.

This is the only record I have because I used my P.O. Box for most of my mailing needs.

II. MY PROFESSIONAL HISTORY AT KEAUHOU BAY BEGINNING IN 1997

My connection to Keauhou Bay began long before I moved to 78-7108 Kamehameha III Road. It began in approximately 1997, when I was hired as a deckhand aboard the Fair Wind II, operated by Fairwind Inc. The Fair Wind II departs from and returns to Keauhou Bay on its snorkel and dive tours along the Kona Coast. As confirmed in the attached letter of Captain Mitch Stauffer (Exhibit D-5), I worked for Fairwind Inc. as crew for over two years beginning around 1997.

During those same years and throughout the years that followed, I also worked as a deckhand, snorkel guide, and lifeguard aboard other vessels and operations based at or operating from Keauhou Bay, including Hawaii Island and Ocean Adventures whom I worked for at different years. I worked as a deckhand manta ray night guide for them. I also worked for Dolphin Discoveries, and Sea Quest. These operations have since changed ownership, but during my time working on them, all operated out of Keauhou Bay, and when I moved into 78-7108 Kamehameha III Rd. address, I was able to then walk to work in the bay.

My professional connection to Keauhou Bay has continued throughout my adult life. Between approximately 2010 and 2012, I worked as a kayak guide and paddleboard rental operator with Ocean Safaris Kayak Adventures, which was based at Keauhou Bay. From approximately 2014 through 2025, I served as a SNUBA instructor and guide aboard Fairwind Inc. vessels — the Fair Wind II and the Hula Kai — both of which operate out of Keauhou Bay. This is corroborated by the letter of Brian Heustis, SNUBA operator, attached as Exhibit D-6, and the letter of Chuck Lathrop, attached as Exhibit D-7.

III. THE NATURE OF MY STANDING

I have worked on the water at Keauhou Bay, in multiple roles and across multiple operations, for the better part of three decades. I lived on the bay at 78-7108 Kamehameha III Road for approximately thirteen years, vacating only in August 2025 due to family circumstances beyond my control. Prior to living there, I worked there. During my years there, I lived and worked there in Keauhou Bay.

The proposed development at issue in this proceeding is not an abstract concern to me. It is a direct threat to the bay that has been the center of my professional life since 1997 and my home for over a decade. I have a direct, substantial, and longstanding stake in the preservation and proper stewardship of Keauhou Bay. My heart has been in this bay for many years.

I respectfully submit that my standing as a Petitioner in this matter is firmly established by the facts set forth above and the documentary evidence attached hereto as Exhibits D-1 through D-7.

Photo below showing the address on the house Rebecca Melendez lived in for around 13 years.

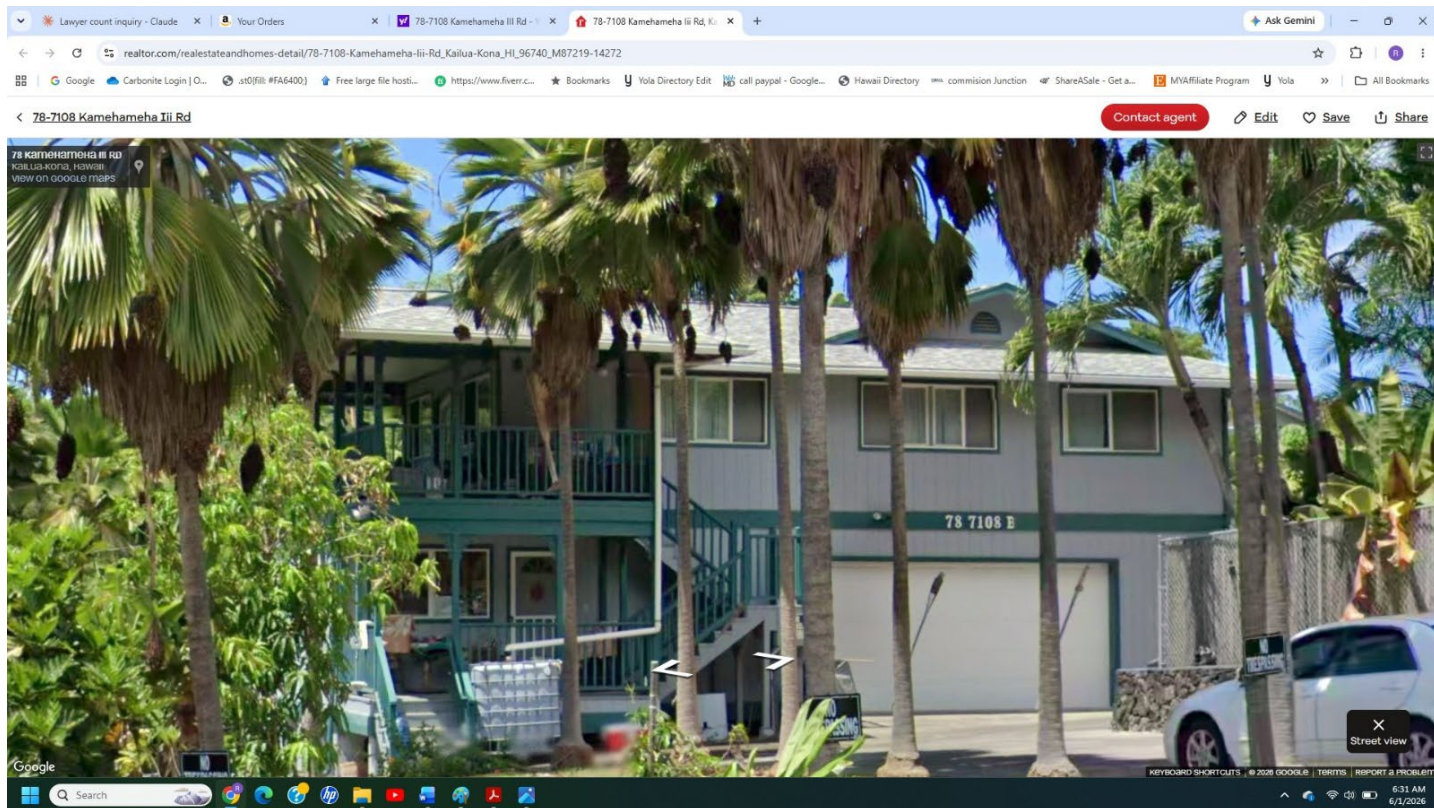
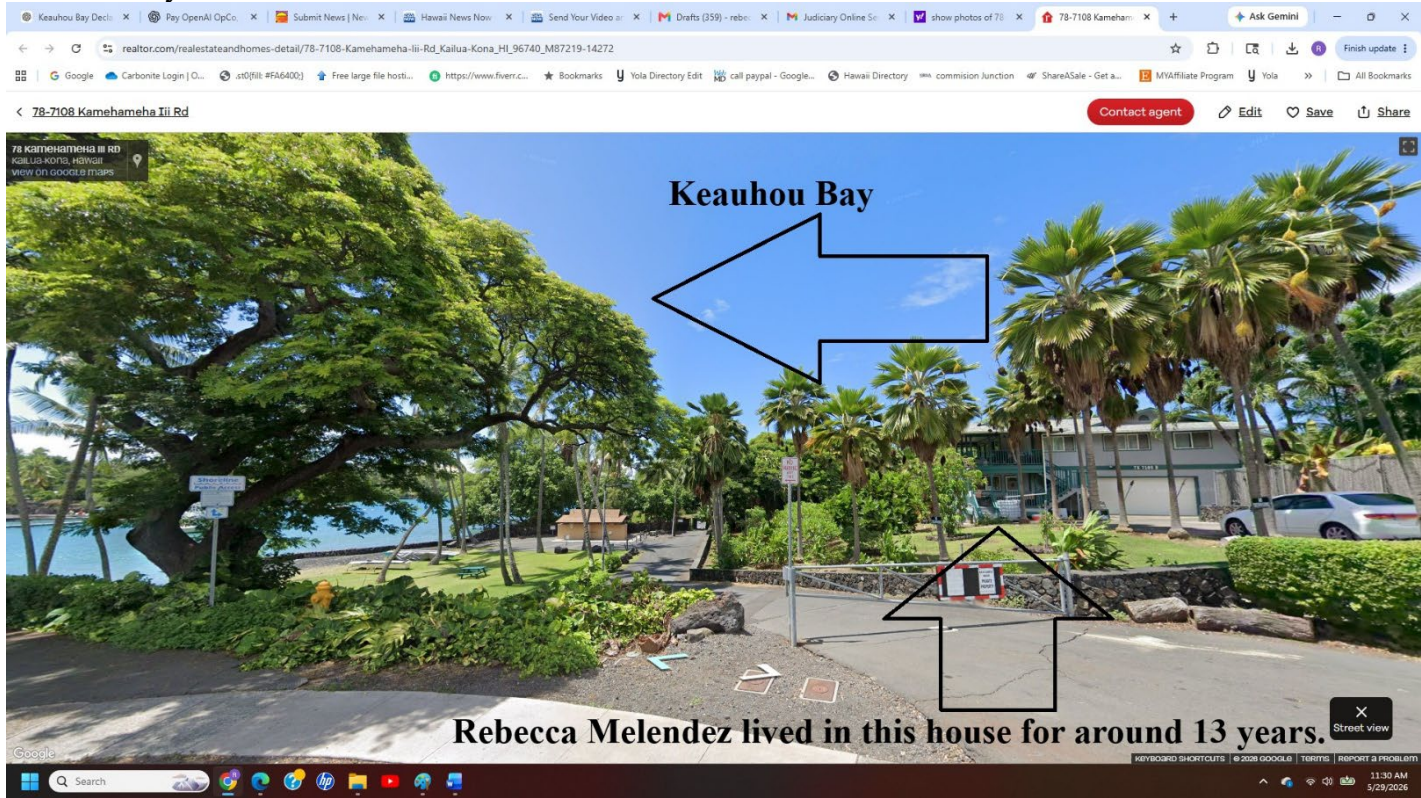


Photo below showing the house Rebecca Melendez lived in was the first house right next to Keauhou Bay.



I declare under penalty of perjury under the laws of the State of Hawai‘i that the foregoing is true and correct to the best of my knowledge and belief.

Rebecca Melendez

bigislandtalk@gmail.com

EXHIBIT LIST

Exhibit D-1 – Amazon order history screenshot, 2016: Rebecca Melendez, 78-7108 King Kamehameha III Rd, Kailua Kona, HI 96739

The zip code shown in Exhibit D-1 (96739) reflects a data entry error — 96739 is the zip code associated with my P.O. Box, which was also saved in my Amazon account at that time, and was inadvertently applied to my street address. The correct zip code for 78-7108 Kamehameha III Road is 96740, as reflected in Exhibits D-2 and D-4.

Exhibit D-2 – Amazon order history screenshot, 2020: Rebecca Melendez, 78-7108 A King Kamehameha III Rd, Kailua Kona, HI 96740

Exhibit D-3 – Amazon order history screenshot, 2025: Rebecca Melendez, 78-7108 King Kamehameha III Rd. #A, Kailua Kona, HI 96740

Exhibit D-4– Amazon order history screenshot, 2014: Rebecca Melendez P.O. Box 390041 Keauhou, HI 96739

Exhibit D-5 – Letter of Captain Mitch Stauffer, dated May 21, 2026

Exhibit D-6 – Letter of Brian Heustis (SNUBA operator), dated May 29, 2026

Exhibit D-7 – Statement of Chuck Lathrop, dated May 29, 2026