

Pre-Final Environmental Impact Statement
For
Kona Golf Course
Keel, South Kona, Hawaii
Department of Parks and Recreation
County of Hawaii

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PRE-FINAL ENVIRONMENTAL IMPACT STATEMENT

FOR

KONA GOLF COURSE

KEEI, SOUTH KONA, HAWAII

(Pursuant to Governor's Executive Order Dated August 23, 1971)

By

Department of Parks and Recreation

County of Hawaii

December 1973

ENVIRONMENTAL IMPACT STATEMENT

FOR

KONA GOLF COURSE

KEEI, SOUTH KONA, HAWAII

DEPARTMENT OF PARKS AND RECREATION

COUNTY OF HAWAII

INTRODUCTION

The County of Hawaii through its Department of Parks and Recreation has proposed to develop a public golf course at Keel, South Kona, as part of a planned recreational complex which would include the Palemano Point area. The purpose of this complex is to provide increased recreational opportunities and facilities for the West Hawaii region. By extension, it would also serve to increase the availability of such opportunities and facilities throughout the County.

Public recreational areas and facilities are seriously lacking in the West Hawaii region in relation to the size of the population.¹ In addition, the geographic distances involved in traveling to existing public recreation areas and facilities are quite great. The proposed complex of which the golf course is a part would help to correct the region's recreational deficiency while being in a location more central to the existing population distribution.

The golf course project is one of many recreational facilities proposed for the Kona region. By developing various facilities at the same time, a range of recreational opportunities can be provided and different recreational interests can be served.

PROJECT DESCRIPTION

Historical Background

The proposed project was planned early in the 1960's. Several long-range plans have called for the development of a recreational complex, including a public regional golf course in South Kona, to serve the needs of the West Hawaii region. These include:

- A Plan for Kona, by Harland Bartholomew and Associates, 1960.

Until the 1971 revised General Plan was adopted by the County Council, A Plan for Kona served as the general plan for the Kona region. In this plan, nine resort centers, concentrated along the coast to the north and south of Kailua were described. One center was suggested at Palemano Point with a golf course just to the south. It should be noted here that in the 1971 revised General Plan, the Palemano Point area was not designated for resort use.

- West Hawaii Highway Corridor Study (Environmental and Urban Design Proposals for Hawaii: West Hawaii Project), prepared by Belt, Collins and Associates for the National Foundation on the Arts and Humanities, the State Department of Transportation, and the County of Hawaii, June, 1968.

This study refers to a joint State-County memorandum outlining a planning study for the "Kealahou Historic Conservation Area". The memorandum states in part that "(the coastal areas from Kaawaloa to Honaunau) should be developed under a common plan...." It calls for the "Development of a municipal golf course and recreation center in the area mauka of the present Keeki road."

- Park Development Plans: Kalapana-Kaimu, Hookena, Palemano Point, Kiholo Bay, by Sanford C. Hill for the Department of Parks and Recreation, County of Hawaii, 1968.

An 18-hole golf course is one of the recreational facilities planned for a South Kona Coast complex of historical and recreation areas. This plan also calls for a park at Palemano Point.

- The South Kona Coast Historic and Recreation Area, Island of Hawaii, by the Offices of Thomas Creighton and George Walters for the Lieutenant Governor, February, 1969.

This plan outlines a scenic corridor along Kealahou Bay which loops past a golf course mauka of Mokuakae Bay and ends at Honaunau Bay.

- General Plan, County of Hawaii, 1971.

Under the Courses of Action for the Recreation element, South Kona district, the plan states "Develop a regional public golf course."

- State Comprehensive Outdoor Recreation Plan (SCORP), Department of Planning and Economic Development, State of Hawaii, 1971.

The 1971 SCORP notes that a County golf course is planned in South Kona. In the 1969 SCORP the Keeki-Palemano Point area was delineated as a potential recreation service center, i.e., an area with the potential to be "a regional, multi-purpose complex which is planned and developed as a unit...."

The policy decision to proceed with the project as planned is reflected by CIP appropriations made by the 1969, 1970, and 1971 Legislatures and by the Hawaii County Council. These appropriations are:

- ACT 155, SLH 1969: \$200,000 for the Keeki Golf Course; construction of first "nine" of 18-hole public golf course (supplement to local appropriation).
- ACT 187, SLH 1970: \$200,000 (\$350,000 local matching); Kona (Keeki) Golf Course; incremental construction of a regulation 18-hole municipal course, complete with clubhouse and driving range facilities.

- ACT 197, SLH 1971: \$250,000; Kona (Keei) Golf Course development; incremental construction of a regulation 18-hole municipal golf course; design and construction of clubhouse, driving range and parking facilities (to supplement prior appropriation and to be supplemented by \$250,000 local matching).
- ORDINANCE 192: adopted January 15, 1968; \$25,000.
- ORDINANCE 327: adopted June 17, 1970; \$375,000.
- ORDINANCE 409: adopted June 16, 1971; \$250,000.

The above ordinances refer to a Kona (Keei) Golf Course and are actually the budgets adopted by the County Council for Capital Improvement Projects.

In implementing the policy decision to develop the golf course at Keei, William Bell, golf course architect, was hired by the County in 1970 to develop the golf course design. In 1971, Anthropological Research International was contracted to conduct an archaeological investigation.

The policy decision to develop a public golf course at Keei and the realization of the proposed project was interrupted by two transitional changes in State regulations. The first of these is the State Land Use Commission's revised regulations. Under the old SLUC regulations, golf courses were considered permitted uses in an Agricultural District. The revised regulations amended on August 4, 1969, deleted golf courses as permitted uses in the Agricultural District. It has, therefore, been necessary to apply for a Special Use Permit for the proposed golf course. A Permit Application has been filed with the Hawaii County Planning Commission. Action on the application has been pending the acceptance of this document.

The second change was the requirement of environmental impact statements for any project involving State funds and/or lands under the Governor's Executive Order of August 23, 1971. This requirement is being fulfilled by this document.

Recreational Aspects

In the past decade golf has become an increasingly popular sport with all segments of the population on both a national and state level. As a result, there has been a corresponding demand and need for golf courses, especially public ones which enable people to participate at a minimal cost.

Golf is one of several recreational activities which are regarded as "suppressed" in that participation is limited by the supply of facilities. SCORP statistics show a low participation rate for golf. These statistics may reflect the lack of golf facilities for "as revealed by survey data recreational behavior is contingent upon availability and accessibility, in other words, it is supply generated."² The 1971 SCORP cites golfing as a new activity which "residents throughout the State express a desire to try...."³ It should be pointed out here that Kona is in a transition from an agriculturally based economy. This transition gives people more leisure time in that many residents will be working the usual 8-hour day rather than the agricultural day which extends beyond 8 hours. The lack of school teams, junior golfers, etc., in the Kona area may also reflect the lack of a reasonably priced golf facility.

Presently, there is one public golf course in the County of Hawaii. It is located in Hilo, the population, commercial and governmental center of the island. The large size of the island, coupled with the existing characteristics of population distribution, present situations for the County of Hawaii which are unlike those of the other islands in the State. Such situations often require the duplication of County-provided facilities so as to serve the various areas of population concentration. A single facility in one part of the island almost never adequately serves the entire population.

The Palemano Point recreational complex is foreseen as the major beach and picnicking area for North and South Kona. Because prime beach areas, especially sandy ones, are extremely rare due to the relative geologic youth of the island, the proposed Palemano Point complex is also expected to be used by residents from throughout the island as well as by visitors. The proposed 18-hole golf course, which would be mauka of Puuhonua Road, is intended to round out the recreational complex by providing a range of activities.

Except for the Hilo Municipal Golf Course, all of the existing courses on the island, of which there are seven, are private courses open to the public. Two of these are 9-hole courses. There are also plans for the proposed construction of additional private courses.

The Hawaii Island Golf Association (HIGA) is the coordinating organization for most of the various golf clubs and activities on the island. The functions of HIGA are to oversee golf activities, in particular those relating to the public course, and to assign handicaps to members of the association and participating clubs. Participation in tournaments is limited to those golfers with registered handicaps in the association. An estimated 1,500 golfers belong to various golf clubs and approximately twice that number participate but do not belong to clubs.

One of the basic purposes of the proposed golf course at Kei is to provide increased recreational opportunities in West Hawaii. Although there is a private course in the Keauhou area of North Kona, the proposed public course will make it possible for the many people who cannot afford the higher costs of the private courses to become active participating golfers. This is borne out by the differing costs of public and private courses.

At the Keauhou-Kona Country Club, green fees for residents and guests staying in the Keauhou area are \$7.50 per person. Rentals for carts are \$8.00 and these are mandatory in that the course is made for riding. Annual single membership is \$364 and \$464 for family membership. Annual membership entitles members to unlimited play, however, cart fees are still mandatory for each round of play. At the Hilo Municipal Golf Course, basic green fees on weekdays are \$2.00 per person and \$3.00 on weekends. Cart rentals are \$7.00, but these are optional in that the course has been designed for walking and most golfers do walk. Monthly cards are also available for \$10.00 and the golfer may play an unlimited number of times during the month on his card. In addition, reduced rates are available for students and retired persons. Students less than 18 years of age can play at any time for a 50¢ green fee. They can also obtain monthly cards for \$4.00. Retirees pay a \$1.00 fee on weekdays and a \$1.50 fee on weekends. These fees cover the entire day. Monthly cards for retirees cost \$5.00.

This points out a great difference in the expenses incurred at a private course as compared with a public one. To golf on a Saturday would cost a resident twosome \$23.92 (green fees, mandatory cart and tax) at Keauhou. The same twosome would pay a fee of \$6.00 at the Hilo Municipal Golf Course (without cart), or 67¢ if they have monthly cards on a prorated basis. For students and retirees, the daily prorated costs based on monthly cards are 13¢ and 17¢ respectively. The fees listed are the current ones and are subject to change. The minimal costs at a public course can be expected to stimulate greater participation in the sport.

Opponents of the golf course claim that the high initial costs, compounded by maintenance costs, cannot justify the construction of one. Admittedly, operation and maintenance costs at the Hilo Municipal Golf Course are greater than its income. The operation of a public facility at a loss is also common to beach parks, athletic fields and gymnasias, swimming pools, and tennis courts. Stadia and arenas, and other municipal recreational facilities would not be justifiable on the basis of active participants (football, baseball, basketball, boxing, etc.), however, upon considering the number of passive participants (spectators) as well as the added benefits of the facility to the community, such projects become more reasonable to the public's eye.

At the present time, the provision of the aforementioned facilities for public use supersedes a profit motive. The Department of Parks and Recreation feels that the assessment of user fees may tend to discourage the participation of many people at public facilities. For example, the Mauna Kea Beach Hotel charges \$2.00 for guests of the hotel, and \$5.00 for non-guests to play on its tennis courts and, similarly, the Kona Surf charges \$2.00 for guests and \$4.00 for non-guests. The County provides similar facilities at no cost to the players.

It should be noted here that golf is the only recreational activity sponsored by the County for which there is a charge to the participants. In a sense, the golfer is "subsidizing" the County in the provision of a public facility.

Further, tourists are given playing priority at private courses, most of which are associated with resort developments. For those courses associated with resort developments, where there are a certain number of rooms with a certain occupancy rate, it can be expected that resident golfers will find it more and more difficult to gain access to such courses as the room inventory and occupancy increase.

The main purpose of the proposed Kona Golf Course is to serve local residents. Operational policies, such as those in force at the Hilo Municipal Golf Course, will favor the local golfers. Monthly cards will be made available, clubs will be allowed to schedule tournaments on an annual basis, and individuals will be able to make reservations on shorter notice, e.g., one week in advance.

Physical Aspects

Proposed facilities for the proposed project are the 18-hole course; a defined, paved parking area; a practice driving range; practice tees and greens; a clubhouse; a maintenance yard; and a nursery. Also included is the spur road off Puuhonua Road which will provide access to the golf course. These are illustrated on the attachment showing the proposed layout of the facility. It should be noted that at this time construction plans for the golf course and irrigation well have been finalized.

Construction of the golf course is estimated to take one and one-half to two years. The commencement of the project is dependent upon the approval of the Special Use Permit application (see "Land Use Regulations") and the approval of the environmental impact statement by the Governor.

Thus far, \$1.3 million have been appropriated for the development of the golf course. These funds are 50% State and 50% County.

Preliminary construction plans for the proposed golf course indicate that the area will be graded to smooth out the rough terrain. No deep grading will occur. The area will be covered with a minimum of eight inches of topsoil. Sand will be used in combination with the topsoil. It is also possible that cinder ash may also be used. An estimated maximum of from 275,000 to 300,000 cubic yards of topsoil will be needed. Pockets of soil are available at the site. It is not yet known where the additional topsoil and sand needed for the construction of the course will be obtained. Possible sources are discussed under the section "Land Ownership". A special permit will be required for quarrying purposes if sources are found in areas designated Agriculture by the State Land Use Commission.

Vegetation for the course would basically be tif dwarf bermuda grass with various kinds of landscaping trees. These trees would include coconut, Norfolk Island pine, African tulip, autograph or Scotch attorney, royal poinciana, fiddle leaf fig, crape myrtle, mokeypod, tecoma, mountain apple, and jacaranda.

During the actual construction of the course, when the terrain is most vulnerable to erosion, precautions will be taken to minimize adverse effects to the surrounding areas. Dry wells will be constructed to retain any possible loss of topsoil. The Department of Agriculture will be consulted during the planting program to insure that sufficient groundcover is planted to minimize future erosion.

In maintaining the course, fertilizers, fungicides, herbicides and insecticides will be applied to the course. The exact composition of the ingredients and the amounts that will be applied are not known at this time. The fertilizer will be a standard composition of nitrogen, phosphorus and potash. The fungicide would most likely be the biodegradable paraquat. The insecticide may be Diazonon, Melathion, Benzine-Hexachloride or Lindane. The fungicide and insecticide would probably be applied once a week on the greens. (Programs similar to those used by the Keauhou and Mauna Kea Beach Golf Courses are anticipated. Their applications are found in the Appendix.) They will be used in accordance with Food and Drug Administration regulations.

As part of the Kona water system, the Department of Water Supply plans to install a trunk line to service the Napoopoo area. The proposed clubhouse would most likely tap into this line for drinking water.⁴

The Department of Parks and Recreation plans to install a well for the purpose of irrigating the course. The water may be brackish which would be satisfactory for irrigation use. Further tests need to be made to determine the water quality and the recharge rate.

The County of Hawaii Sewerage Master Plan proposed a South Kona sewerage system with a 1.2 MGD capacity wastewater treatment facility to be located approximately one mile

south of Kealahou Bay along Puuhoua Road. The plan states that "wastewater reclamation and reuse is considered with effluent being used to irrigate a proposed golf course located above the Palemano Point area."⁵ Until the wastewater treatment facility is constructed, the Department of Parks and Recreation is considering the use of a self-contained sewage unit to serve the proposed golf course facilities.

Electricity is presently available up to one-half mile beyond the village of Napoopoo in the vicinity of the County rubbish dump. One spur off this line serves Keei Beach. The existing line will have to be extended to serve the proposed golf course site.

SITE DESCRIPTION

The Kona region is on the western side of the island of Hawaii, the southeasternmost and youngest of the islands in the Hawaiian Chain. In the Polynesian language system, Kona denotes the leeward or sheltered side of an island.

Location

The proposed golf course site is in the ahupua'a of Keei in the judicial district of South Kona and is described as a portion of parcel 9 of Tax Map Key 8-3-04. The site consists of approximately 220 acres of land mauka of Puuhoua Road and is owned by the Bishop Estate. The actual golf course is expected to occupy about 170 acres of that area. This area lies about midway between Napoopoo and Honaunau. It is to be southeast of Kealahou Bay, which is designated as a marine conservation zone with Class AA waters. Almost all the waters off the Kona coast are classified as AA. The site is also to the north of the City of Refuge National Historic Park.

The western boundary of the proposed course would be approximately 1,500 feet from Mokuakae Bay where it will abut Puuhoua Road for about 1,800 feet. This boundary will curve mauka at a point inland from Keomo Point, where the southwesterly boundary would range from approximately 3,000 to not quite 4,000 feet from the ocean. The course would run from about 40 feet to 320 feet in elevation. The attached map shows this in detail.

Soils

The Soil Conservation Service fieldchecked the proposed site and made the following comments:

The soils on the parcel are Waiaha, extremely stony silt loam, 6 to 12 percent slopes (WHC). Waiaha soils are well drained volcanic ash soils, high in fertility. Effective rooting depth is generally 15 to 20 inches. Erosion hazard is moderate. Lava flows--pahoehoe (rlw) also occur on the parcel. This miscellaneous land type is characterized by a billowy, glassy surface which is relatively smooth. In some areas, the surface is rough and pressure domes are common. There is practically no soil covering the pahoehoe.

....Approximately 50% of the land has the Waiaha soil, the remaining 50% is pahoehoe.⁶

Productivity and Existing Vegetation

Combining soil characteristics with other pertinent factors such as rainfall, the Land Study Bureau has rated the productivity of this areas as "E", or very poor. The land, however, is presently used for cattle grazing. In the mauka area, particularly above the 300-foot elevation, about five head of cattle can be supported on 10 acres of land for about six months of the year. Vegetation in this area consists primarily of ekoa (haole koa), natal redbtop, lantana, some cactus, guinea and bermuda grasses. The soil deposit is greater in this area than at lower elevations. In the lower section of the proposed site the vegetation basically consists of sparse kiawe trees, lantana, and opiuma. For about half of the year, about 25 acres of land in this section can support one head of cattle.

Climate

Kona, being the leeward side of the island, has a mild climate, for which it is well known. The mountain masses of Mauna Kea, Mauna Loa, and Hualalai deflect the prevailing northeasterly tradewinds so that they do not have much direct bearing on the wind system of the Kona area. In fact, the prevailing wind pattern in Kona is a diurnal land and sea breeze circulation. This pattern is primarily due to the differential heating and cooling of land and ocean as well as to the influence of the mountain masses.

Based on information available from the closest rainfall station at Napoopoo, mean annual rainfall in the area of the proposed site is about 38 inches, ranging from a mean monthly low of 2.05 inches in February to a mean monthly high of 4.10 inches in September. The wetter months are May through September.⁸ Rainfall is typically spotty in distribution and highly variable in duration and intensity. The district, however, is subject to high intensity rainstorms that can cause localized flooding. As the soil is highly permeable, most of the rainfall percolates into the basal aquifer. Basal water ultimately escapes into the ocean, but it is not known whether fresh water is flowing into Mokuakae Bay.⁹

August is generally the warmest month with a mean monthly maximum temperature of 84°F.¹⁰ The coolest month is February with a mean monthly minimum temperature of 63°F.

Groundwater

Basal groundwater is found near sea level. It is brackish to saline at the shore and for several thousand feet to several miles inland. Little is known about the groundwater hydrology of this area.¹¹

There are no perennial streams in this region. The only flow which enters the ocean is runoff from intense rains.

Endangered Species

There are no known endangered species in the area.

Historic Sites

The proposed golf course site is located in close proximity to areas of historical importance: Kealakekua Bay, the City of Refuge at Honaunau Bay, and the Moku'ohai Battlefield.

Anthropological Research International surveyed the proposed golf course site area for the Department of Parks and Recreation. More than 22 sites were located. It was recommended that as many sites as possible be preserved and incorporated into the landscape of the golf course, regardless of the evaluation of the sites' value. In their

report, Anthropological Research International stated that:

With regard to golf courses in general--the proposed Keel golf course would probably be the first of its kind with traps and obstacles which could incorporate archaeological phenomenon within its boundaries. In addition, the surrounding area could be restored, through the use of native Hawaiian plants and vegetables, to appear somewhat similar to the early landscape.¹²

The majority of the sites located in the survey consists of walls, platforms, and storage vaults. These sites and supportive research by Anthropological Research International indicate the area to be one of prehistoric and transitional agriculture.

The opinion of the State Preservation Officer was sought to alleviate the potential conflicts over the disposition of historic sites on the proposed site. To date, we have not received a reply. However, the recommendation of Anthropological Research International in the preservation and incorporation of sites into the landscape will be taken. This will be done in compliance with Chapter 6, Hawaii Revised Statutes, to insure that these sites are available should they be determined to be worthy of placement on either the Hawaii Register of Historic Places or the National Register of Historic Places.

LAND USE REGULATIONS

The State Land Use Commission has designated the proposed site area as Agriculture. Under Section II-C-2.14-f of the State Land Use District Regulations, golf courses are not considered a permitted use. A Special Use Permit is therefore needed before the proposed golf course can be developed. As of this date, the Special Use Permit application is pending before the County Planning Commission.

County zoning of the area is Unplanned. This zoning considers a golf course to be a permitted use. The County General Plan Land Use Pattern Allocation Guide Map (see Appendix) delineates the proposed site as Open, which includes open space recreation areas. Surrounding Land Use Allocation designations are Low Density Urban. Makai of Puuhonua Road there are Medium Density Urban designations and scattered Resort designations set back from the shoreline. It should be noted that designated land uses on the General Plan Land Use Pattern Allocation Guide Map are "long-range guides to general location and will be subject to: a) existing zoning; b) State Land Use District; and c) zone guide map and interpretation."¹³

LAND OWNERSHIP

The proposed site, owned by the Bishop Estate, was negotiated for by the County of Hawaii in conjunction with the acquisition of Palemano Point as a beach park area.

In July of 1972, the County of Hawaii and Bishop Estate reduced its negotiations to a written agreement.¹⁴ The agreement contained three separate segments, each dependent on the other.

The first segment required Bishop Estate to dedicate to the County of Hawaii in fee simple land necessary for the right-of-way for the proposed highway between Napoopoo and Honaunau. The County shall accept dedication no later than December 31, 1973, and shall start construction on the roadway by October 1, 1974. Should the County fail to award a contract for construction of the highway within one year after dedication, title to such land shall revert to Bishop Estate.

The second segment required Bishop Estate to dedicate in fee simple 223 acres of land for the Keei golf course, subject to court approval. Dedication of a 60-foot wide right-of-way for access to the golf course site from the Napoopoo-Honaunau road is also required. Failure to enter into a contract to construct the golf course within one year after dedication shall cause title to the land to revert to Bishop Estate. Other conditions are:

1. Dedication by Bishop Estate of an appropriate well site in fee simple, if needed, to irrigate the golf course;
2. Appropriate easements for water and electrical lines and access from well site to reservoir site;
3. Appropriate reservoir site in fee simple;
4. Appropriate water line easements;
5. Bishop Estate to provide utility easements;
6. County shall use materials now existing on site for golf course development. If on-site materials are insufficient, suitable locations shall be explored and Bishop Estate will make materials available to the County for removal and use on the golf course. The County shall restore all borrow sites to an acceptable environmental condition usable by Bishop Estate for any future land use contemplated therefor.
7. Prior to dedication, the County had the option to lease the 223-acre site for 55 years.

The third segment of the agreement refers to Palemano Point Park site which Bishop Estate was to lease to the County for a term of 55 years with an option to purchase during the first five years of the lease term. The pertinent conditions are:

1. All rents paid under the lease up to time of exercise of the option shall be applied to the purchase price.
2. The purchase price after exercise of the option to purchase during the first two years of the term of lease shall be the fair market value of the premises as of October 1, 1972.
3. Appraisal of the premises shall be based on the present condition as of October 1, 1972, that is, the fair market value determined without regard to any anticipated enhancement of value based upon the County's plan of development, including but not limited to the development of the proposed

highway, the golf course, the anticipated future availability of water, utilities and other amenities, landscaping and proposed uses of the County.

In May of 1973, a hearing¹⁵ was held in Honolulu before Judge Masato Doi for court approval of the Trustees' dedication of lands to the County for the Keel Golf Course and the Honaunau-Napoopoo Road. Court approval for the dedication of the lands was granted.

At the present time, dedication of lands for the road and the golf course is held in abeyance, pending the outcome of the EIS acceptance. Negotiations for Palemano Point is also postponed pending the EIS acceptance. The appraisals for Palemano Point have been completed.

Dedication of lands for the road and Keel Golf Course and negotiation for purchase of Palemano Point, at the present time, depends on the acceptability of the golf course EIS.

OTHER PUBLIC IMPROVEMENTS PROPOSED IN THE AREA

In addition to the appropriations made for the proposed golf course, other public improvements have been planned for the area.

Under Act 155, SLH 1969, an appropriation was made to the Division of State Parks for a "Kealakekua Bay State Historical Park". The appropriation was for historical and archaeological research and the acquisition of private lands to combine with State lands. Act 187, SLH 1970, appropriated funds for plans and construction of an underwater park at Kealakekua Bay. The status of both of these projects is unknown at the present time.

Monies have been appropriated for two road projects in the area. The first is the mauka road leading to Napoopoo. Under Act 155, SLH 1969, \$45,000 was appropriated for plans and land acquisition to widen, realign, and improve the road leading from the Belt Highway to the Napoopoo-Kealakekua Bay area. The County provided \$45,000 matching funds and the State/County total was matched with a Federal fund of \$90,000. The total appropriation amounted to \$180,000. Act 197, SLH 1971, provided for a \$100,000 appropriation to supplement the prior appropriation and to be matched by the County for the planning and initial land acquisition for the widening, realignment and improvement to five and one-half miles of road leading from the Belt Highway to Kealakekua Bay. The total of all appropriations for this project is \$380,000.

Appropriations have also been made to improve Puuhonua Road. Act 155, SLH 1969, provided \$15,000 for plans and land acquisition to widen, realign, and improve the coastal road from Napoopoo, Kealakekua Bay to Honaunau City of Refuge. The County matched this appropriation with \$15,000 and the total State/County share was matched with \$35,000 by the Federal Government bringing the total to \$65,000. In 1970, Act 187 provided an additional \$220,000 for land acquisition, plans and construction for the improvement and realignment of the road. A equal amount was matched by the County (\$220,000) and the State/County share matched with \$440,000 Federal funds, thus totaling \$880,000. In 1971, Act 197 appropriated an additional \$250,000 for the project which was supplemented by \$200,000 County funds and \$600,000 in Federal funds bringing a total of \$1,050,000. The entire appropriation for this project to date is \$1,995,000.

Act 197, SLH 1971, made a \$550,000 appropriation to the Department of Land and Natural Resources for the extension of and improvements to the South Kona water system along

the lower government main road from Keokea Junction towards Keei. This project is now in the design stage for the pipeline and reservoir.

\$2,925,000 has already been funded for water and road improvements in the immediate area adjacent to the proposed golf course. Appropriations for an underwater park and a historical park for Kealakekua Bay have also been made. These projects will certainly "urbanize" the area by providing amenities to improve present conditions where they (amenities) are lacking or not up to urban standards. It should be noted that these projects are independent of the golf course proposal and have already been determined to be essential for the area. These projects will benefit not only the residents of the area, but also the residents of the County as well as the State -- users have direct benefit and non-users have indirect benefit in that these projects have made a contribution to our economy.

THE ENVIRONMENTAL IMPACT OF THE PROPOSED ACTION

The proposed golf course will have several different kinds of impact on the environment. For one thing, it will change the land use of the proposed site from low productivity grazing to public recreation. The land would be used more intensely under public recreation and by more persons. The area in which the proposed site is located is relatively undeveloped and the proposed recreational complex is expected to increase the number of persons visiting the area, particularly on weekends.

The proposed project would also change the landscape which is now existing. The area is presently in open space and would still remain as open space should the golf course be developed. It is the character of the open space, however, which would be altered. Existing vegetation would be replaced by that previously described under the subsection on physical aspects in the Project Description.

Some effect on the groundwater hydrology of the area may occur. Because of the limited information available on the ground water system of the area, the extent of the possible effect is unknown. Most likely, if any effect does occur it would be due to the leaching of materials necessary to maintain the course, such as fertilizers and herbicides. Whether this would actually occur and whether these would reach the water table or the ocean has not been determined. The U.S. Soil Conservation Service, Department of Land and Natural Resources and Department of Health were consulted to this effect. (See Appendix) None of their statements are totally conclusive, but they all indicate that sound management practices would minimize unforeseen problems. The Department of Parks and Recreation, in utilizing these sound management practices, shall first consult with the Departments of Agriculture and Health prior to applying fertilizers and biocides. In addition, should there be other agencies' requirements to be met, the Department of Parks and Recreation shall conform to them. Upon receiving the approval of the appropriate agencies a program monitoring the application rate will be conducted.

Should the project be realized, there is no question that slight alterations to the existing topography and terrain would occur. The grading which is expected to be necessary, however, will not be extensive. In addition, the top soil and sand which will be brought in for landscaping will be an alteration to the existing terrain.

The Soil Conservation Service has rated the suitability of the proposed site for golf course use. In a letter to the Planning Director, dated August 2, 1972, the District Conservationist provided the following assessment:

1. Slight: These soils have few, if any, limitations for the use considered.
2. Moderate: These soils have one or more properties that limit their use. The limitation may be overcome by special measures or treatment. This will increase the cost of the development or use over the normal cost expected on soils with slight limitations.
3. Severe: These soils have one or more properties that seriously limit their use. It may be possible to correct these limitations, however, the cost will be high.

The major soil features used to rate the soil for golf fairways are: surface texture, surface stones, depth to bedrock, subsoil permeability, and available water holding capacity.

Most of the soils on the parcel are on slopes 6 to 20 percent. Waiaha soils are rated severe for golf fairways, due to being extremely stony. Lava flows -- pahoehoe -- are rated very severe for golf fairways due to rock outcrops and lack of practically any soil covering.

Properties of soils described pertain to the top 5 feet of soil. No attempt has been made to classify substratum geological material.

Corrections of the above-mentioned conditions are being partially made with the importation of top soil and sand.

There are no conflicts with any other known developments in the area.

There will be minor impact on historical sites within the proposed site as most of them which were located during the survey will be incorporated into the landscape of the golf course.

Bishop Estate plans for development of lands in the area would have a definite impact on the existing character of this area. Such plans include a resort south of the golf course site. Their plans would be subject to the County's General Plan, adopted as Ordinance 439. The General Plan Land Use Allocation Guide Map illustrates the potential development which could occur in this area (see map in Appendix). The map is a guide to future land use and must be reviewed in relation to the General Plan document. It is not intended to be a firm directive but an indication of location for various land uses.

There will be both negative and positive impacts on the social environment of the area. On one hand, a public recreational facility for the residents of West Hawaii will be provided. This facility will be located central to the distribution of population. Other aspects of this facility and its purposes have been previously discussed. On the other hand, development of the facility will have some effect on the existing lifestyles of the area and thereby disrupt to some extent the lives of the residents

of the nearest areas (Napoopoo and Honaunau). Such an impact and/or disruption will occur, however, with already planned and funded projects such as the Kealakekua Bay Historical Park, the Kealakekua Underwater Park, the development of the water system, and the two road improvement projects. Amenities for the area's development will exist even without the County's development of the golf course and the recreational complex will help to increase the rate at which the surrounding area is developed, open space and accessible shorelines, both highly esteemed qualities in developed areas, will be guaranteed to posterity.

ANY ADVERSE ENVIRONMENTAL EFFECTS WHICH CANNOT
BE AVOIDED SHOULD THE PROPOSAL BE IMPLEMENTED

Alterations of the physical terrain which would occur if the proposal were implemented are unavoidable environmental effects. The extent of adverse effects stemming from such alterations would be as minimal as possible. Should any major adverse effects from grading be expected to occur, these would be corrected during the engineering stages of the project.

Use of herbicides, fungicides, insecticides, and fertilizers may be considered an adverse effect of the project. Sound management practices in accordance especially with the Department of Agriculture, Department of Health, and Soil Conservation Service requirements should minimize this adversity. The Department of Parks and Recreation shall consult the aforementioned agencies over the specific use of fertilizers and biocides to minimize the effects of chemical residuals upon the groundwater hydrology or the ocean. A program monitoring the application rates of these specific substances shall be conducted by the Department of Parks and Recreation.

In order to avoid or to minimize direct flow of surface runoff into the ocean or into the surrounding area, precautions will be made to channelize sheet flows and runoff into sumps or siltation basins. Planning for this type of erosion control will be detailed during the preliminary engineering stages of this project. A sound planting program will also enhance this erosion control.

The social environment of the proposed site area may be adversely affected. The planned recreational complex is expected to attract more persons into the area. Upon consulting the personnel of the Hilo Municipal Golf Course and the Planning Branch, Highways Division of the Department of Transportation, an estimate of 250 golfers and 500 vehicles per day on peak days (generally a Saturday or Sunday during the summer) was arrived at. Additionally, there would be the potential for land costs to rise due to the development of amenities. Development of areas general planned for low density urban and resort uses could be encouraged by the construction of the recreational complex. It needs to be noted here, however, that pressures for development in the area already exist and the golf course may not be a major factor in the potential development of the area. In addition, if the golf course is not developed but Palemano Point beach and the roads and water system are, the impact of these developments on the lifestyles of the area would be the same, if not greater. Insofar as real property taxes are concerned, a check with the Hilo Tax Office revealed that persons living around the Hilo Municipal Golf Course are not directly affected by proximity to the golf course in the assessment of the value of their property.

ALTERNATIVES TO THE PROPOSED ACTION

With the alternative of not constructing a golf course at Keeki, the County is also faced with two options -- the development or non-development of Palemano Point as a recreational complex. With the non-development of both the golf course and the recreational complex the present character of the area will be maintained (until the projects - totaling more than \$2.9 million - for the area are completed); the already appropriated \$1.3 million by both the State and County of Hawaii could be "saved" or redirected, but both golfers and non-golfers will be lacking recreational facilities. This alternative does not alleviate the pressure of resort development. State parks and utilities totaling \$2.9 million still have great impact. There is no guarantee that a private golf course would not be built by developers within the areas designated for resort development in the General Plan.

The option of no golf course but continued development of the recreational complex at Palemano would result in the County losing its option to buy the Point lands at the fair market value of October 1, 1972. Should the County desire to purchase the land through condemnation procedures, the then current fair market value must be paid. Only the increase in acquisition costs of these lands may surpass the \$1.3 million "saved" by not building the golf course. The development of the complex will alter the present character of the land along with the already planned and funded access and utility improvements totaling in excess of \$2.9 million. Although on-golfers stand to benefit, golfers will still face the high green fees which tend to discourage local participation at the private courses. Again, resort pressures will not be alleviated and a private course in the area is not precluded.

The next alternative is to consider locating the course in an area not requiring the issuance of a Special Permit by the State Land Use Commission. One such site has been much discussed. This is the State-owned land at Kealakehe, adjacent to the Honokahau Small Boat Harbor, currently designated Urban by the State Land Use Commission. Although this site is located closer to the resort area of Kailua, the area has been placed on the National Register of Historic Places. Location of the golf course in this area could disrupt just as many sites of historical significance as at the proposed Keeki site. The integrity of the historic landmark could be jeopardized by the proposed project at Honokahau. Large quantities of brackish water are discharged along the coastline near the small boat harbor. The impact of a golf course with regard to water quality could be at least similar to that at Keeki. Additionally, there is no soil available at the site and borrow sites would not be as readily available as they are with the Keeki proposal. Mean rainfall for the Honokahau area is less than 20 inches as compared to the approximately 40 inches (38 inches at the closest station in Napoopoo) at Keeki.¹⁶ This means an additional irrigation load for the proposed Honokahau-Kealakehe golf course.

The State also has proposed plans for the use of their lands mauka of the Queen Kaahumanu Highway in the same Kealakehe area. The County is presently negotiating land acquisition for the development of a regional spectator sport complex to coincide with the State's residential development. A golf course is not a part of the combined plans as sufficient land (approximately 200 acres) is not readily available. Furthermore, no timetable has been set for this proposal.

The acquisition of the former Pacific Empress Golf Course has been suggested as an alternative action. Presently, the golf course is unkept and over-grown with vegetation. Approximately 170 acres is the minimum requirement for a regulation sized 18-hole golf course. This former golf course was for nine holes so sufficient land for an additional nine holes is required. Being in Kailua, a conservative estimate of \$15,000/acre would require approximately \$2.5 million just for acquisition costs. Additional monies must be appropriated for the construction of the golf course itself. Here, the acquisition costs of privately-owned land would be prohibitive. Additionally, the local golfers could face some competition from the tourist golfers for play.

The following alternative considers constructing the golf course in a district other than North or South Kona. South Kohala and Kau Districts being the borders of the Kona Districts are the logical considerations. Building a golf course outside of the Kona Districts does not support our basic premise that public recreational facilities are needed in Kona. A greater distance factor is introduced by going out of the district. A minimum of 35-40 miles is added by having to golf in South Kohala; much greater distances must be travelled in order to reach Kau.

The idea of subsidizing local golfers' green fees at private courses could also be considered, but this alternative would be short-termed rather than long-ranged as it would be extremely expensive to implement this for any length of time. In essence, the Hilo Municipal Golf Course provides this subsidy for the Hilo golfers with rates lower than those found at private courses. At this course, however, golf carts are not mandatory. Even with a green fees subsidy, the local golfers would not receive the benefit of scheduling on an annual basis and the mandatory cart requirement must still be contended with.

One point stressed at the Public Hearing and at the Planning Commission's Workshop was that the residents of South Kona are not really anti-golf, but anti-golf course at Kei. This sentiment is based upon an anti-development of resorts at Kei. However, the pressures of resort development are the same whether or not the golf course is developed at Kei, as the Kealahou Bay State Historical Park, two road improvement projects, and one water system project have already been planned and funded for the area. Although the golf course will increase the rate of residential or resort development (urbanization) by adding to the distribution of amenities -- water, sewerage treatment, and better roads, the implementation of the golf course/recreational complex guarantees the preservation of open space and shorelines at "bargain" costs. This same guarantee does not exist with the aforementioned alternatives.

The environmental and social impact expected to occur from the golf course project would be the same regardless of where the golf course were to be located.

RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

The proposed golf course and recreational complex will benefit long-termed environmental concerns. Golf courses are open space and in that sense it would positively enhance the ecology and natural beauty of the environment. Possible future development poses a threat to open space. Short-term uses of the environment under this proposed project would basically tie into the long-term productivity mentioned above. The greatest value of the proposed project is that a large area will be assured of being maintained as open space for public use.

ANY IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF
RESOURCES WHICH WOULD BE INVOLVED IN THE PROPOSED ACTION

The major commitment of resources would be the top soil and sand involved in developing the golf course. Other resources would include water for irrigation purposes, land and labor. All of these resources, however, might be viewed as recycled to another area than being irretrievably or irreversibly committed.

We also commit ourselves to the area's population growth and development. This combination of archaeological sites, open space and recreation has been determined to be the best choice (by the County) to enhance this commitment.

ECONOMIC AND SOCIAL ANALYSIS

The proposed golf course project has been a controversial one. Various individuals and organizations have expressed the opinion that should the golf course be developed, then land in the South Kona area will almost immediately be developed, thereby destroying the existing lifestyles of the area. It has also been contended that the course would be more for tourists than for residents. The objective of the project, however, is to provide additional recreation opportunities and facilities in the Kona area. It is expected that more persons will be able to participate in this suppressed sport if the facility were developed.

A survey of Konans was not conducted by the County to determine preferences and needs. It is felt that surveys are not the most valid tool unless great expense and energy is devoted in this regard. There is great difficulty in designing surveys to insure that reliable input and conclusions are generated. However, a survey was conducted by Joyce Crisafi and Friends in July 1973 in Kona, Hawaii. A preliminary picture of recreational preferences is perceivable, but the results remain inconclusive due to its sampling methodology. Portions of this survey are included in the Appendix. On October 11, 1973, a Planning Commission workshop was held at the Konawaena High & Intermediate School Cafetorium. In addition to the views expressed at the earlier public hearing, the participants had an opportunity to discuss the County's negotiations with the B. P. Bishop Estate. These negotiations have already been discussed under Land Ownership.

Under the Resort element of the General Plan, the direction of development outlined for South Kona is that of small hotels and minor developments.

Economically speaking, the estimated cost for developing the proposed course, practice range, and other facilities is between \$1.5 and \$1.8 million. The Palemano Point plan is estimated to cost in the neighborhood of \$5 million or more.

As golf is one County-sponsored activity for which there is a charge, some revenue, albeit small, is expected from the course. It should be noted, however, that one of the functions of government is to provide facilities on a non-profit basis. Operating costs for the Hilo Municipal Golf Course in fiscal year 1971 were \$128,165.74 while revenue totaled \$69,842.25 for the same time period. The difference between these figures represent the function of government as carrying part of the burden of providing a public facility. The Hilo Municipal employs 17 persons and a similar number of persons would most likely eventually be employed at the Kona course.

FOOTNOTES

- 1 General Plan, County of Hawaii, 1971, pp. 67-68.
- 2 SCORP, 1971, p. 117.
- 3 Ibid, p. xii.
- 4 The South Kona Water System is presently supplied by two wells at Keeki at the 766-foot elevation. These have a total capacity of 0.86 MGD and a safe capacity of 0.43 MGD. Average usage is 0.12 MGD and on days of heavy usage may go as high as 0.18 MGD. According to the Department of Water Supply, more wells can be installed at Keeki should the need arise. If all lands zoned less than one acre were to be developed, the Department of Water Supply estimates that the demand would be about 0.63 MGD, excluding the Napoopoo area.
- 5 Sewerage Study for all Urban and Urbanizing Areas of the County of Hawaii, prepared by Sunn, Low, Tom, and Hara, Inc. for the County of Hawaii, September, 1970, p. 34.
- 6 Letter to Planning Director from District Conservationist, Kona Soil & Water Conservation District, August 2, 1972.
- 7 Information from University of Hawaii Extension Service agent.
- 8 Basic Water Resources Data: Island of Hawaii, DLNR Report R34, 1970, p. 49.
- 9 Preliminary Report on the Water Resources of the Kona Area, Hawaii, Dan A. Davis & George Yamanaga, USGS in cooperation with DLNR, June, 1968.
- 10 Basic Water Resources Data: Island of Hawaii, p. 93.
- 11 Preliminary Report on the Water Resources of the Kona Area, Hawaii.
- 12 An Archaeological Investigation of Lands for the Proposed County Golf Course in Keeki, South Kona, Hawaii, prepared by Anthropological Research International for the Dept. of Parks and Recreation, County of Hawaii, 1972, pp. 1-2.
- 13 General Plan, County of Hawaii, p. 77.
- 14 Memorandum of Agreement on Proposed Napoopoo-Honaunau Road, Keeki Golf Course and Palemano Point Park, Keeki, South Kona, Hawaii, July 24, 1972.
- 15 Civil No. 38360, Circuit Court of the First Circuit.
- 16 Basic Water Resources Data: Island of Hawaii, DLNR Report R34, 1970.

APPENDIX

SUMMARY OF PUBLIC HEARING HELD AUGUST 3, 1972, AT
KAINALIU, KONA, ALLOWING A SPECIAL PERMIT TO
DEVELOP THE KEEI MUNICIPAL GOLF COURSE

PRO:

- I. To complement an overall recreational plan of integrated regional park and recreational complex at Palemano Point.
- II. To provide ample recreational opportunities for the general public, within a non-prohibitive price range.
- III. A second municipal golf course is needed for the 1500 registered and 3000 non-registered golfers on the island. Moreover, a population increase adds to this demand.
- IV. The site is well suited, being part of a recreation complex where land is available at practically no cost to the County, where the terrain is appropriate, where rainfall is adequate, and where an appreciative amount of soil is available.
- V. To broaden the tax base in Kona by aiding tourism in the Keel area.
- VI. To bolster the declining membership and participation in golf clubs in the Kona area.
- VII. To boost the school golf programs.
- VIII. To increase the income of the B.P. Bishop Estate through effective use of Estate lands.
- IX. Since preparatory work has been completed, the site is better prepared for development compared to alternate sites.
- X. The Keel site is closer to the majority of prospective users than Kealakehe.

CON:

- I. Proposed site is not best choice; cheaper, State-owned sites closer to population center are available, these sites have soils less important to agricultural production.
- II. A golf course is low on list of priorities for Kona area.
- III. The proposal is a misuse of taxpayers funds since it is prejudicial -- in favor of middle class and upper class people, immigrants and tourists, while being against the interests of the majority of local people.
- IV. Golf course would subsidize expansion of tourist industry.

- V. The Palemano Point area is rich in historical sites which must be preserved.
- VI. The sport is offensive and alien to Hawaiian culture.
- VII. The present B.P. Bishop's will is invalid.
- VIII. Great social disruption resulting from construction and change in population.
- IX. Golf course and resort development are detrimental to preservation and protection of agriculture and agricultural lands.
- X. Planning Commission not represented by Kona Commissioner and hence not representative of Kona interest.

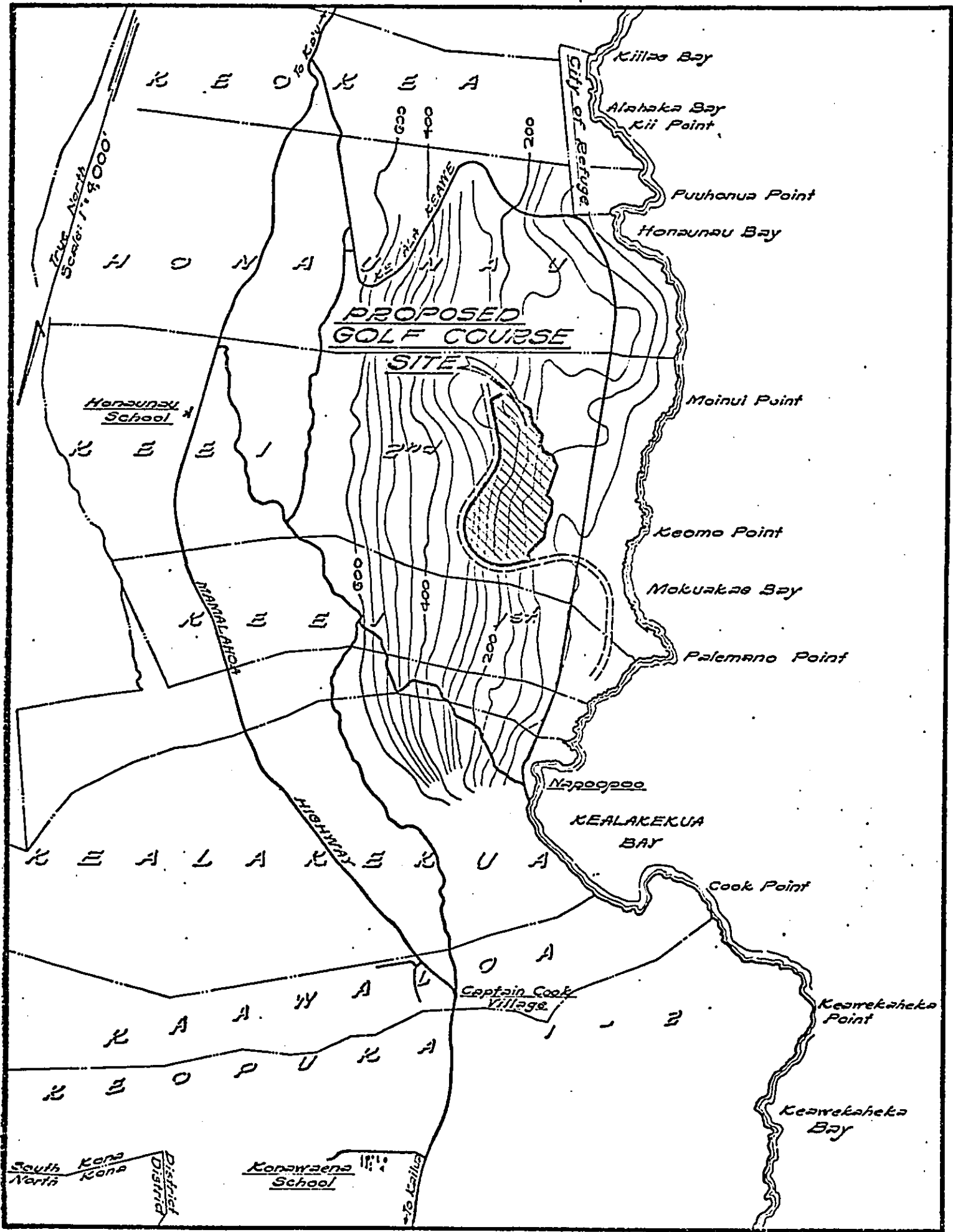
SUMMARY - PLANNING COMMISSION WORKSHOP
OCTOBER 11, 1973 KONAWAENA HIGH & INTERMEDIATE SCHOOL CAFETORIUM

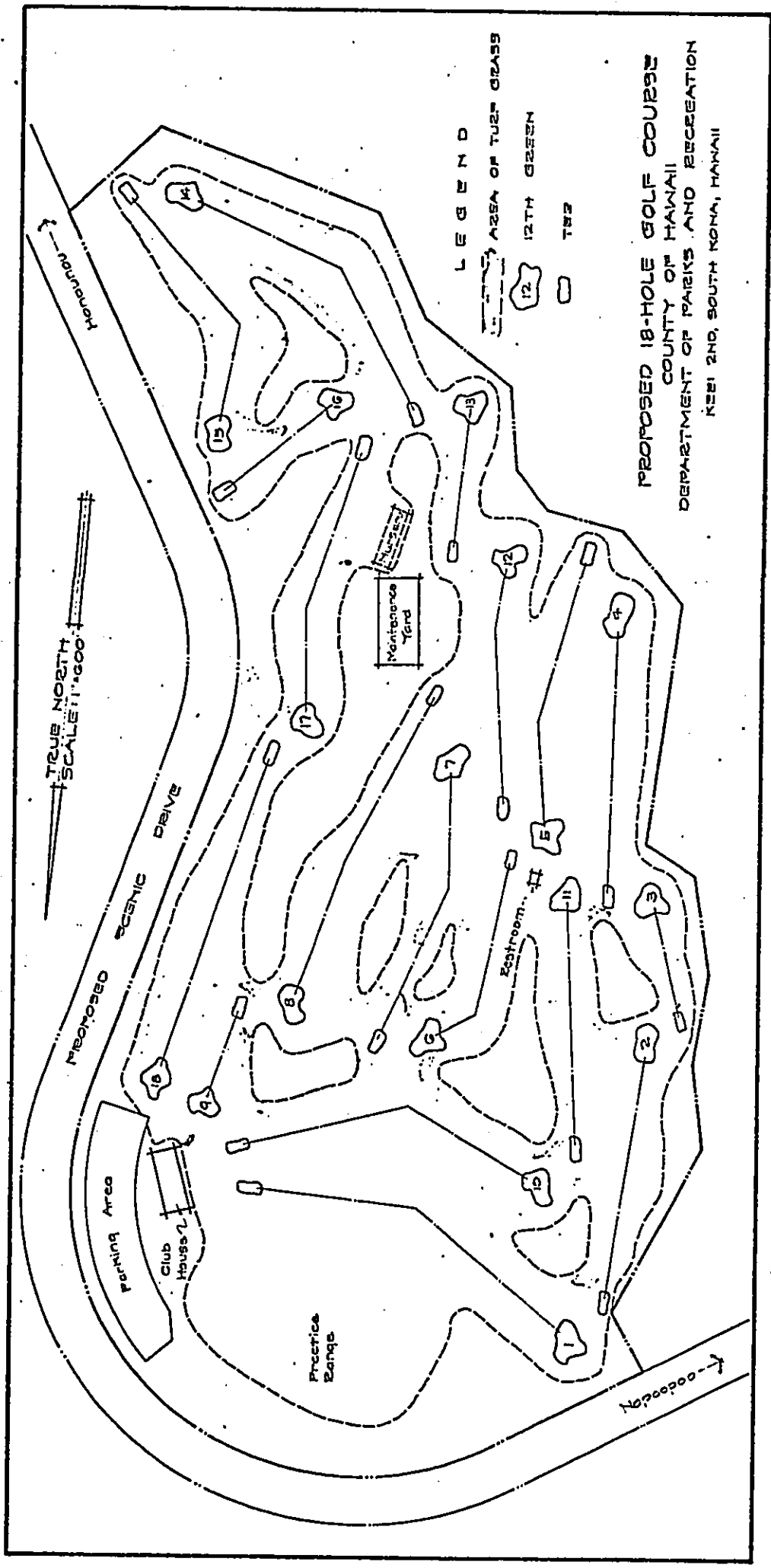
PRO:

1. The golf course, lands for road development, and land for Palemano Point recreational complex although appearing to be separate are so intimately related that, in essence, they should be considered as one entity. The acquisition/development of this "package" is more economically advantageous than the acquisition/development of the same as separate entities.
2. Already appropriated State and County funds may be "matched" by the Bureau of Outdoor Recreation should the golf course and the Palemano Point area be developed as a complex.
3. Although the development of resorts is a separate issue, the County's General Plan earmarks such development close by and the denial of a municipal golf course may not discourage the development of these lands.
4. The community is to gain due to increased revenues from the development of a golf course.
5. Golf participation will increase due to lower green fees.
6. Keel is the best location, open space as an aesthetically pleasant golf course - is guaranteed.

CON

1. Even if it is more expensive, obtain only the Palemano Point lands.
2. Kealakehe is a better site, it is closer to the population center, a golf course and resort development are already planned there and this proposal for Keel will only duplicate the situation.
4. The ambient air will be polluted due to an increase of vehicle emissions, the golf course and resorts will generate this increased traffic.
5. The existing lifestyles of the community are threatened.
6. The marine environment may be damaged.
7. Historical sites will be destroyed.
8. Golf is a prejudicial sport; due to its high costs only a few may participate.





LEGEND

- - - - - AREA OF TUFF GRASS
- 12TH GREEN
- TSS

PROPOSED 18-HOLE GOLF COURSE
 COUNTY OF HAWAII
 DEPARTMENT OF PARKS AND RECREATION
 KEEI 2ND, SOUTH KOHA, HAWAII

TRUE NORTH
 SCALE 1"=600'

PROPOSED SCENIC DRIVE

Parking Area
 Club House

Practice Range

Maintenance Yard

Egstrom

Napoo



	All involved	41-over (34)	20-40 (21)	15-25 (55)
Booth Park	14	14	14	2.2
Boat Ramps	9	9	6	4
Drag Strip	3	3	2	1.7
Golf Course	10	10	7	7
Greenwell	15	15	11	2.4
Historic	4	4	4	8
Neighborhood	11	11	13	1.6
Shoreline	3	3	7	1.3
Swimming	23	23	2.2	1.3

All involved

- Swimming Pool - 95
- Greenwell Park - 50
- Booth Park - 50
- Neighborhood Park - 42
- Golf Course - 23
- Shoreline Trails - 23
- Boat Ramps - 19
- Drag Strip - 19
- Chief Historic Park - 17

41-over

- Swimming Pool - 20
- Greenwell Park - 15
- Booth Park - 14
- Neighborhood Park - 11
- Golf Course - 10
- Boat Ramps - 9
- Historic Park - 4
- Drag Strip - 3
- Shoreline - 3

Boating affairs
Public transit center

26-40

Swimming Pool - 22
Beach Park - 14
Neighborhood Park - 13
Greenwell Park - 11
Golf Course - 7
Shoreline - 7
Beach Ramps - 6
Historic Park - 4
Dixie Strip - 2

15 - 25

Swimming Pool - 45
Greenwell - 24
Beach Park - 22
Neighborhood - 15
Dixie Strip - 14
Shoreline - 13
Historic - 8
Golf Course - 7
Beach Ramps - 4

SURVEY ON RECREATIONAL NEEDS ..

CLIFFORD HIRAI

Name, if so desired

Circle age bracket

15-25 26-40 41-over

CAPT. COOK, SENIOR

Current address

Circle sex

M F

Below you will find some of the recreational needs of the Kona community. Please mark with an X, three (3) of the recreational projects listed below that you will use.

Please feel free to add any other comments at the bottom of the page.

- Beach park at Palemano Point (Keei Point)
- Boat ramps
- Drag strip
- Golf course at Keei
- Greenwell Park expansion
- Historic park at Kaloko
- Neighborhood parks
- Shoreline trails
- Swimming pool at Konawaena

Other comments:

August 7, 1973

Mr. Sunao Kido, Chairman and Member
Board of Land and Natural Resources
State of Hawaii
P. O. Box 621
Honolulu, Hawaii 96809

As you may realize, the County of Hawaii has proposed to develop a public golf course in Keci, South Kona, TRK 8-3-04:pcr. 9. Recently, an environmental impact statement was submitted to the Office of Environmental Quality Control for the proposed project. Among the comments received as a result of the EIS review process concerned how archaeological sites within the proposed project area should be handled.

When the Keci site was being investigated as a location for a public golf course, this department undertook an archaeological survey to determine whether any sites of significance existed in the area. The results of the survey indicated an absence of significant sites. Nevertheless, we thought that the mere existence of sites presented a unique design opportunity. We therefore planned to design the golf course in such a manner as to utilize the existing sites as part of the landscaping scheme. We would assure that the incorporation of the sites into the landscaping would be tastefully and sensitively accomplished.

Some of the reviewers of the EIS, however, feel that some of the archaeological sites should be preserved in total. In your capacity as State Preservation Officer, we are requesting your official opinion in order to help alleviate potential conflicts over the disposition of the subject sites. A copy of the report prepared for us by Roy Nishiyama and Chris Lothian, entitled "An Archaeological Survey of Keci Golf Course Lands", has been sent to the Division of State Parks Historic Section. It should also be noted that the sites in the proposed golf course area have not, to our knowledge, been covered by the Statewide Inventory.

We look forward to your kind consideration of this request and hope for an early reply so we may complete the final EIS. We thank you in advance for your cooperation.

ROBERT T. FUKUDA
Director

cc: Office of Environmental Quality Control
Planning Department

August 10, 1973

Mr. Sunao Wido, Chairman and Member
Board of Land and Natural Resources
State of Hawaii
P. O. Box 621
Honolulu, Hawaii 96809

Mr. Fred Houghton, State Conservationist
United States Dept. of Agriculture
Soil Conservation Service
440 Alexander Young Building
Honolulu, Hawaii 96813

Dr. Walter B. Quisenberry, Director of Health
Department of Health
State of Hawaii
P. O. Box 3373
Honolulu, Hawaii

In the draft environmental impact statement we prepared for the proposed public golf course at Keefi, South Kona, we indicated that it is not known whether or not the proposed project would have an effect on the water table or coastal waters due to the use of fertilizers, pesticides and herbicides. The Office of Environmental Quality Control has suggested that we contact you for detailed comments as to whether or not there is a real danger of water contamination.

As we do not know application rates for the proposed golf course, should the project be realized, we have contacted the Keauhou Beach & Country Club and the Mauna Kea Beach Hotel Golf Course to find out their rates of application for fertilizers, pesticides and herbicides. We have also found out their irrigation rates for maintenance of the golf courses. This information is contained on the attachment with a map of the proposed site.

Mr. Sunao Kido
Mr. Fred Haughton
Dr. Walter B. Quisenberry
Page 2
August 10, 1973

We realize that Kealahou and Mauna Kea are established courses and that application rates for a new course would differ. Further, localized geologic and climatic conditions vary. If, however, you could possibly give us an indication of the possibility of contamination to groundwater and/or nearby coastal waters, it would be sincerely appreciated. Your technical expertise in such matters would certainly assist us in making an environmentally sound decision.

We look forward to your cooperation and hope for an early reply so we may expedite the decision-making process. We thank you in advance for accommodating our request.

ROBERT T. FUKUDA
Director

cc: Office of Environmental Quality Control
Planning Department

att: Site Map
Application Rates

FERTILIZER AND INSECTICIDE APPLICATIONS

KEAUHOU BEACH & COUNTRY CLUB (155 acres)

Urea, composed of straight nitrogen, is the main fertilizer used. About 125 pounds per acre is applied to the fairways and the areas surrounding the greens and tees from 8 to 10 times a year.

Another fertilizer, Turf Supreme (16-6-8 $\frac{1}{2}$ and trace elements) is also used. 250 pounds per acre is applied to the fairways (110-120 acres) four times a year.

17.4-17.4-10 (with trace elements) was used last year to remedy certain deficiencies in the soil. 250 pounds per acre was applied to the greens (3.54 ac.) every three months.

In response to public concern over the use of insecticides and fungicides, the Club has, in the past year, changed its policies on the use of such chemicals. Insecticides and fungicides are now used only when problems with disease or insects occur. The program is a remedial rather than a preventive one.

Previously, Dibrom and Spotret were used. One quart of Dibrom was mixed with 200 gallons of water and sprayed on the greens once a week. It was also occasionally used on the fairways for spot treatments. Nine pounds of Spotret, a fungicide, was mixed with 200 gallons of water and sprayed on the greens once a week.

Irrigation rates are 1.0 inch of water per week on the fairways and 1.5 inches per week on the greens. During the summer about 600,000 gallons of water per day are used; the volume drops to about 450,000 gallons per day during the winter.

MAUNA KEA BEACH HOTEL GOLF COURSE

Fertilizers are applied to the fairways and tees (150 acres) once every five to six weeks as follows:

- 1) First 5-week period: one application 16-4-8 at the rate of 250-300 pounds per acre.
- 2) Second 5-week period: one application of sulfate of ammonia (21% nitrogen) at the rate of 250-300 pounds per acre.
- 3) Third 5-week period: repeat application of sulfate of ammonia.
- 4) Fourth 5-week period: repeat application of 16-4-8.

Once a week Urea (61% nitrogen) is applied to the greens. One-fourth pound of actual nitrogen (i.e., .41 pounds of urea) is applied per 1,000 square feet. The total area of the greens is about 180,000 square feet or about 4.13 acres.

The insecticide Dy-syston is used on this course. It is an organic phosphate in granular form. Forty pounds per acre is applied once a year.

Irrigation rates are 2 acre inches per week. This is equivalent to two inches of rainwater on one acre per week. One million gallons per day are used during the summer and 700,000 gallons per day during winter.

September 11, 1973

Mr. Sunao Kido, Chairman and Member
Board of Land and Natural Resources
State of Hawaii
P. O. Box 621
Honolulu, Hawaii 96809

RE: Proposed County of Hawaii Golf Course at Keel, South Kona
Tax Map Key 8-3-04:por 9

As a result of the EIS review process, we had recently requested the opinion of the State Preservation Officer regarding the disposition of historical sites at the proposed site (letter dated August 7, 1973). We had also requested detailed comments as to whether or not there is real water contamination from the use of fertilizers, herbicides and pesticides (letter dated August 10, 1973).

Perhaps these requests have been overlooked due to other pressing matters. We would appreciate receiving these comments by September 24, 1973, as we are in the process of preparing our final EIS.

We look forward to your reply and thank you for your cooperation.

ROBERT T. FUKUDA
Director

cc: Office of Environmental Quality Control
Planning Department

September 11, 1973

Mr. Fred Haughton, State Conservationist
United States Dept. of Agriculture
Soil Conservation Service
440 Alexander Young Building
Honolulu, Hawaii 96813

RE: Proposed County of Hawaii Golf Course at Keel, South Kona
TMK 8-3-04:por 9

As a result of the EIS review process, we had recently requested detailed comments as to whether or not there is real danger of water contamination from use of fertilizers, pesticides and herbicides (letter dated August 10, 1973).

Due to other pressing matters, our request may have been overlooked. We would appreciate receiving your comments by September 24, 1973, as we are in the process of preparing our final EIS.

We look forward to your reply and thank you for your cooperation.

ROBERT T. FUKUDA
Director

cc: Office of Environmental Quality Control
Planning Department

September 11, 1973

Dr. Walter B. Quisenberry, Director of Health
Department of Health
State of Hawaii
P. O. Box 3378
Honolulu, Hawaii

RE: Proposed County of Hawaii Golf Course at Keel, South Kona
TMK S-3-04:por 9

As a result of the EIS review process, we had recently requested detailed comments as to whether or not there is real danger of water contamination from use of fertilizers, pesticides and herbicides (letter dated August 10, 1973).

Due to other pressing matters, our request may have been overlooked. We would appreciate receiving your comments by September 24, 1973, as we are in the process of preparing our final EIS.

We look forward to your reply and thank you for your cooperation.

ROBERT T. FUKUDA
Director

cc: Office of Environmental Quality Control
Planning Department

JOHN A. BURNS
GOVERNOR OF HAWAII



DIVISIONS:
CONVEYANCES
FISH AND GAME
FORESTRY
LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
P. O. BOX 621
HONOLULU, HAWAII 96809

September 12, 1973

Mr. Robert T. Fukuda, Director
Dept. of Parks and Recreation
25 Aupuni Street
Hilo, Hawaii 96720

Dear Mr. Fukuda:

Your letter of August 10, 1973, asks for detailed comments on the danger of water contamination stemming from the use of nutrients and biocides to develop and maintain the proposed Keeki Golf Course.

We do not have detailed geological information of the area in question, but we feel confident that because of the volcanic origin of the area, one can expect high percolation rates and that water applied to the golf course will tend seaward. We understand that the golf course site was selected because of relatively better soil conditions, and therefore expect that percolation would be less than that of surrounding areas.

Because of expected seaward flow and because of distance from the Keeki Wells, we would not anticipate contamination of this public water source. We have little information on wells located makai of the proposed golf course, but we expect that such wells would be brackish and would be surprised to find it used as potable water sources.

We are aware that nutrients and biocides are commercially available which are used on food crops. We would expect that such chemicals can safely be used on the golf course. As a matter of added precaution, you may wish to consult with the State Department of Agriculture on any chemical for which use is contemplated, particularly with respect to persistency, lethal dosage ratings, and applications. We caution against use of certain household chemicals.

Mr. Robert T. Fukuka

-2-

September 12, 1973

With the possible exception of Kealakekua Bay, we believe that coastal waters have ample diurnal circulation and form a sufficiently large body of receiving waters. We are unaware of adverse effects on marine and avian life in this area attributable to concentration of chemicals via biological food chains. We include in this, the waters offshore of the Keauhou Golf Course. You may wish to acquire help in analyzing samples of waters from Kealakekua Bay to Honaunau in order to establish a baseline of trace elements prior to construction of the golf course; this to be compared with a follow-up analysis after the golf course has been well established.

We do expect that development of the golf course will alter percolation, run-off and evapotranspiration rates of the site. We do not foresee how these changes will affect lands and biota makai of the site. Because irrigation and nutrients are contemplated, it would not be surprising to find later that the site's biomass had increased and eventually organic detritus built up.

We would urge judicious application of irrigation water to augment rainfall. Such practice would not only serve to conserve available water supplies in the area, but also minimize any inadvertent adverse effects which may result from leaching.

In general, we feel that your proposal bears some of the features of land reclamation and on that basis, is deserving of support. We suggest, however, that the major environmental effects are the economic and social changes that the project may abet and the resultant demands upon public services and resources. On such questions, we believe we should yield to the concerns of residents of the area.

We regret that our reply to you is not supported by empirical data and that we are not confident enough to venture comments on possible long-term changes to substrata.

Very truly yours,

BOARD OF LAND AND NATURAL RESOURCES



SUNAO KIDO
Chairman and Member

UNITED STATES DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE

440 Alexander Young Building, Honolulu, HI 96813

September 12, 1973

Mr. Robert T. Fukuda
Director, Dept. of Parks
& Recreation
County of Hawaii
Hawaii County Bldg.
25 Aupuni Street
Hilo, Hawaii 96720

Dear Mr. Fukuda:

Subject: Comments Pertaining to the Draft Environmental
Impact Statement for the Proposed Kona Golf Course
at Kei, South Kona, Hawaii

The above environmental impact statement was reviewed in this office and forwarded to Dr. Marland's office on May 22, 1973. It has been reviewed again in light of your letter of August 10, 1973.

Because of a lack of research information on vertical water movement in the proposed area, we are unable to determine whether or not there would actually be any real danger of water contamination due to the use of fertilizers and pesticides on the golf course.

Reduction in the percolation of water below the rooting zone will diminish the chances of ground water contamination by agricultural chemicals. Therefore, we would suggest that good management practices, such as applying irrigation water, fertilizer and pesticides in adequate but not excessive amounts, would help reduce the potential of ground water contamination. The danger to the ground water can also be reduced by use of chemicals that tend to be absorbed in the soils and are only moderately persistent.

We appreciate the opportunity to review and comment on this proposed project and regret that we cannot definitely state whether there will be any danger of water contamination from the use of fertilizers and pesticides in this project.

Sincerely,


Francis C. H. Lum
State Conservationist



JOHN A. BURNS
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HAWAII 96301

WALTER B. QUISENBERRY, M.P.H., M.D.
DIRECTOR OF HEALTH

WILBUR S. LUMMIS JR., M.S., M.D.
DEPUTY DIRECTOR OF HEALTH

RALPH B. BERRY, M.P.H., M.D.
DEPUTY DIRECTOR OF HEALTH

HENRI P. MINETTE, M.P.H., DR.P.H.
DEPUTY DIRECTOR OF HEALTH

October 1, 1973

Mr. Robert Fukuda
Department of Parks and Recreation
County of Hawaii
25 Aupuni Street
Hilo, Hawaii 96720

Dear Mr. Fukuda:

Re: Proposed County of Hawaii Golf Course at
Keei, South Kona, TMK: 8-3-04: 9

Reference is made to your letter of September 11, 1973 concerning
the subject project.

Although there is no inherent danger of the use of fertilizers,
pesticides and herbicides, the misuse by excessive application of such
chemicals can be a real danger to the marine environment as well as
public health. Therefore, we recommend that any substantial application
of such chemical include a conscientious program to monitor rate of
chemical applications and water quality and other environmental effects.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Shinji Soneda".

SHINJI SONEDA, CHIEF
Environmental Health Division

DT/WW/mh

ATTACHMENTS

JOHN A. BURNS
GOVERNOR



RICHARD E. MARLAND, PH.D.
INTERIM DIRECTOR

TELEPHONE NO.
548-6915

STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
OFFICE OF THE GOVERNOR
~~STATE CAPITOL BUILDING~~ 550 HALEKAUWILA STREET
ROOM 4361 ROOM 301
HONOLULU, HAWAII 96813

July 25, 1973

Mr. Robert Fukuda, Director
Department of Parks and Recreation
County of Hawaii
25 Aupuni Street
Hilo, Hawaii 96720

Dear Mr. Fukuda:

Thank you for allowing us to review and process the draft environmental impact statement for the proposed Kona Golf Course, Keei, South Kona. We are very pleased to have received both favorable as well as adverse responses from the reviewers. It is our belief that this type of active public participation will serve the community's interest by alerting the public decision-makers of all environmental concerns, especially the immediate concerns of the local communities.

The purpose of this letter is to assist you in your efforts in arriving at a final impact statement which both State and County officials can rely upon as a valuable source of information to facilitate arriving at a final decision on the matter of the golf course. It should be noted that the recommendations made in this letter are based on review of the attached responses and our staff's research on this proposed golf course project.

We believe that there should be further clarification of the following major topics in order to develop an adequate impact statement.

Water Quality: As indicated in the EIS, it is not known whether or not the proposed golf course could have an affect on the water table or the adjacent coastal waters due to the use of fertilizers, pesticides and herbicides for maintaining the golf course. 1/In the analysis of this possible problem it would be useful to describe the estimated quantity, type and application rates of these chemicals. It is suggested that a pesticides and fertilizer analysis of similar golf courses along the Kona Coast be conducted and this information could then be transmitted to the Department of Land and Natural Resources, Department of Health, and the Soil Conservation Service for their detailed comments as to whether or not there is a real danger of contamination. With

regard to soil erosion, it may be possible to channelize runoff into sumps siltation basins and to sheet flows in order to avoid direct flow into the ocean. A preliminary inspection of the site by a civil engineer may provide valuable insights as to the feasibility of this type of erosion control. In making these suggestions for further study, we are assuming that the State and County decision-makers are determined to preserve the existing groundwater and coastal ecology of the site.

Need for the Golf Course: It appears that the major concern over this project is the question of who is the golf course for-- the local residents or the tourists? The EIS tended to indicate that the objective for the proposed project is primarily to cater to the local residents. 2/We believe that there should be some clarifications to substantiate this thesis. The following analysis may be used to indicate the types of users that would be likely to be attracted to the proposed facility.

Income and Tributary Area Analysis: Through the use of the census information, it may be possible to obtain pertinent information such as income, type of employment, education, etc., and generalize on the extent of public participation by residents of local communities within reasonable travel times from the Kona region. It may also be possible to ask some of the local golfers for an indication of what can be considered as reasonable travel distances.

Policies Regarding the Use of the Proposed Golf Course: It is indicated in the EIS that monthly passes are used at the Hilo Golf Course. 3/Policies such as this monthly pass system may favor greater participation by the local residents rather than from the tourists since visitors would be less likely to subscribe, and would be able to schedule starting times on a regular basis. Other policies such as giving priority to golf clubs, school organizations and community groups can similarly tend to favor the local residents. We believe that this type of discussion on policies (and possible policies) should be included in the statement to clarify what groups will be using the golf course complex.

Resident Surveys: It may not be totally possible to arrive at a definite demand figure through the census information alone. A resident survey probing attitudes, leisure time, income, recreational priorities, alternatives, etc., may be conducted to indicate the present recreational demand for the golf course and other facilities. It may also be possible to survey the local citizen groups on their position concerning the proposed golf course. If such surveys are used, documentation of all survey methodologies will be essential.

Analysis of Existing Golf Courses: A strong indicator of the demand for golf courses is the number of players which are turned away due to overloads. It may be possible to check with existing golf courses to get an estimate of the number of players which are turned away.

Interpretation of SCORP: Through the public review of the EIS, some reviewers of the statement indicate that SCORP shows a low priority for golf among the local residents in West Hawaii. We recommend your careful review, interpretation, and inclusion of SCORP's data into the final EIS.

It should be noted that no single analysis can truly represent the exact desire and needs of the community and it is not expected that community values are to be the same throughout the realizable future. However, we believe that the State and County decision-makers would feel more secure about the disposition of the golf course if some of the above mentioned analysis were implemented and presented in the final EIS.

Archaeological Values: Some of the reviewers indicate that some of the archaeological sites are perhaps worthy of total preservation rather than to be used as "traps and obstacles". Again, as a means of resolving such conflicts, it appears that the opinion of the State Preservation Officer (Department of Land and Natural Resources) and the Department of Interior would be valuable.

Citizen Participation: Indeed this golf course project is a controversial one. 4/It is noted in the comments offered by Life of the Land and the Kona Conservation group that many groups and individuals have expressed their concerns over this project at public hearings previously held by the Department of Parks and Recreation. It would be helpful for the sake of public review if the hearing proceedings were summarized, presenting the views of both proponents and opponents of this project. This would allow the readers to share the perspectives of others.

Alternatives: Alternative sites and alternative forms of recreation were suggested by some of the respondents. 5/They note that a public golf course is already being planned for the State's recreational complex at Kealahou, and therefore, one would not be necessary at Kei. The validity of this information should be clarified with the appropriate agencies and presented in the final EIS.

Some of the respondents indicated that other forms of recreation should be catered to rather than golf, because, in their opinion, golf serves only a small minority of the public at a great expense. If an accurate demand and cost per capita analysis for golf, as well as other forms of recreation, is presented in the final EIS, we believe that the decision-makers

responsible for the approval of this project could make the appropriate cost allocation determination. Furthermore, if a resident sample survey is used, it may be possible to determine the community's desire for alternative recreational uses such as those mentioned in some of the review comments. The final EIS should also indicate how the cost of maintaining the course will be shared by the County taxpayers.

In pursuing the question of alternatives, it is also very important to address the probability of what would happen to the site if a public golf course was not constructed and the site remained in private hands.

Future Urban Development: The most significant comment, which was received from the reviewers, is the question of how much urban development will be attracted to the region and to lands adjacent to the site as a result of the golf course. Golf courses may tend to provide amenities in the way of open space, which may add to the desirability of locating other forms of urban development within immediate proximity. A recreational facility is normally more likely to occur as a result of demands from existing and anticipated households (resident surveys and census analysis may be used to verify existing demands) rather than the golf course creating the demands for households. ^{6/}However, discussion of the future urbanization is necessary in order to allow the reader to view the proposed project from the perspective of the major regional policies and to allow generalization on the cumulative affects of the proposed project with respect to other major projects within the Kona region. The following indications of future urbanization should be elaborated upon in the final EIS.

General Plan: Perhaps this is the best indicator of future urbanization since the General Plan is bound by County ordinance, and stringent legal procedures must be implemented before any change to the ordinance can be made. As much as possible, the description of the General Plan should indicate the extent, location, and types of industries, households and community facilities. This should be presented in writing as well as in graphic form in the final environmental impact statement, together with careful footnoting as to where the information comes from.

Availability of Public Utilities: Utilities such as water, sewers, highways, access to employment centers, electricity, schools, etc., provide the essential ingredients which make urbanization possible. We find that although there is some discussion of these utilities in the impact statement, the discussion is limited to the golf course users. Some discussion on how these utilities will be used to implement the general plan could be included in the final EIS.

Land Ownership Patterns: In cases where tracts of land are owned by few owners, the probability of urbanization may be greater because parcels do not have to be assembled. Comments on the land ownership patterns for the Keii region may be included.

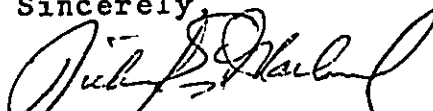
Other Public and Private Projects: Other proposed public and private projects such as parks, schools, general plan change proposals for resorts, and major transportation networks may have a cumulative effect of producing urban development. The final EIS should have a discussion on some of these other proposed developments.

Air Pollution and Traffic Generation: We believe that there should be some statement on the estimated amount of automobile trips that will be generated to the proposed course. The amount of trip generation can then be interpreted to estimate the amount of vehicular emissions.

We hope that we have offered realistic approaches in presenting methodologies and indicators to strengthen the environmental impact statement for this proposed golf course. The analysis presented in this letter only addresses the major concerns which were presented by many of the reviewers. In finalizing the environmental impact statement for this project, we hope that you will send a written response to the agencies and organizations which have offered significant comments to the draft statement and send a copy of your response to our Office. In addition, we recommend that you distribute a pre-final environmental impact statement to those agencies and organizations who have offered detailed comments to this draft statement. Adequacy of the statement will be largely determined by the quality of your responses to these agencies and civic organizations.

Again, thank you for allowing us to review and process this draft environmental impact statement, and we apologize for this delay in getting this response to you.

Sincerely,



RICHARD E. MARLAND
Interim Director

Attachments
cc: Planning Department,
County of Hawaii

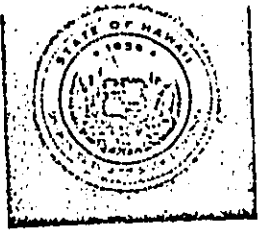
FOOTNOTES

1. Draft EIS for the proposed Kona Golf Course, P. 7.
2. Ibid., P. 4.
3. Ibid., P. 4
4. Ibid., P. 13.
5. See attached comments from the Kona Conservation Group and Life of the Land.
6. It is indicated on Page 13 of the EIS that the Hilo Golf Course employs about 17 persons. This figure in income, together with the total expenditures for golf equipment and services to the golf course (utilities, transportation, etc.) can be used as the estimated demand for increased urbanization since this dollar flow will be used to create jobs in the Kona region. For all practical purposes, this can be considered small when compared to other forms of employment. For example, according to the Hawaii tourism impact plan, hotels create employment at a rate of 1.8 jobs per hotel room.

SUMMARY SHEET

List of agencies and civic organizations offering comments.
(The date of the letter is written in parenthesis.)

1. Department of Planning and Economic Development (July 11, 1973)
2. Department of Land and Natural Resources (June 19, 1973)
3. Department of Agriculture (May 30, 1973)
4. County of Hawaii, Department of Public Works (May 25, 1973)
5. Dr. Reginald H. F. Young (May 25, 1973)
6. Soil Conservation Service (May 22, 1973)
7. U. S. Army Corps of Engineers (June 18, 1973)
8. Environmental Center (June 19, 1973)
9. Department of Transportation (June 27, 1973)
10. Department of the Air Force (July 6, 1973)
11. County of Hawaii Planning Department (May 22, 1973)
12. Hawaiian Telephone Company (July 9, 1973)
13. Legal Aid Society of Hawaii (June 15, 1973 and July 11, 1973)
14. Department of Health (June 19, 1973)
15. Congressman Spark Matsunaga (June 18, 1973)
16. Senator Hiram L. Fong (June 19, 1973)
17. Captain Cook Community Association (June 15, 1973)
18. Life of the Land (June 13, 1973)
19. Kona Conservation Group (June 4, 1973 and June 17, 1973)



STATE OF
HAWAII

DEPARTMENT OF PLANNING
AND ECONOMIC DEVELOPMENT

P. O. BOX 2359 • HONOLULU, HAWAII 96804

July 11, 1973

JOHN A. BURNS
Governor

SHELLEY M. MARK
Director

EDWARD J. GREANEY, JR.
Deputy Director

Ref. No. 9226

MEMORANDUM

TO: Dr. Richard E. Marland, Interim Director
Office of Environmental Quality Control

FROM: SM Shelley M. Mark, Director

SUBJECT: Draft Environmental Impact Statement for Proposed Kona Golf Course
at Keei, South Kona

We appreciate this opportunity to review this draft and offer the following comments in regard to the substantive contents.

Recreational Aspects. Development of this facility would be consistent with the Statewide goals reflected in the State Comprehensive Outdoor Recreation Plan.

Mining of Top Soil. It is evident that any mining of top soil for the subject project should not only proceed in strict accord with County grading ordinances and soil conservation measures but minimized as much as possible for flood control and erosion prevention concerns.

Water Resources, Honaunau Aquifer. Due to past occurrences of droughts and a continuing water shortage in the Kona area, the applicant may be interested in being kept informed of the Hawaii Water Resources Regional Plan now being developed by the Department of Land and Natural Resources. This plan may be helpful in determining whether or not aquifer limits will impose constraints on future urban developments in the Honaunau area.

We hope these comments may be of some help in planning for the orderly growth of South Kona in balance with the natural environment.

JOHN A. BURNS
GOVERNOR OF HAWAII



DIVISIONS:
CONVEYANCES
FISH AND GAME
FORESTRY
LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
P. O. BOX 621
HONOLULU, HAWAII 96809

June 19, 1973

MEMORANDUM

TO: Hon. Richard E. Marland, Interim Director
Office of Environ. Quality Control

FROM: Sunao Kido, Chairman and Member
Board of Land and Natural Resources

SUBJECT: Environmental Impact Statement for the Proposed
Kona Golf Course, Keel, South Kona, Hawaii

The Impact Statement covering the proposed 18-hole golf course, to be constructed on approximately 170 acres of Bishop Estate property at Keel, Kona, Hawaii, has been reviewed by this department.

We have no objections to the project as outlined in the impact statement, but we would appreciate being furnished more detailed information as to which of the historic sites in the 170 acres will be incorporated in the landscaping of the golf course, and the plan of disposition of the balance of problematical sites.

The Division of State Parks of this department may be of some assistance to the County of Hawaii in making a determination of these categories.

BOARD OF LAND AND NATURAL RESOURCES

SUNAO KIDO
Chairman and Member

JOHN A. BURNS
GOVERNOR



FREDERICK C. ERSKINE
CHAIRMAN, BOARD OF AGRICULTURE

WILLIAM E. FERNANDES
DEPUTY TO THE CHAIRMAN

STATE OF HAWAII
DEPARTMENT OF AGRICULTURE
1428 SO. KING STREET
HONOLULU, HAWAII 96814

May 30, 1973

MEMORANDUM

TO: Dr. Richard E. Marland, Interim Director
Office of Environmental Quality Control

SUBJECT: Draft Environmental Impact Statement for the Proposed
Kona Golf Course at Keeli, Hawaii

The Department of Agriculture recognizes that some low productivity grazing lands will be lost but this loss is not a serious concern. Rainfall (20 - 45") and soil quality (mostly pahoehoe) are poor for a grazing operation. The land use classification is Class C for grazing which implies a carrying capacity of 5 - 10 acres per animal unit year (AU). Up to 40 AU would be lost from production which is in agreement with the EIS.

The Department does not foresee a serious loss or interference with agricultural activities.

Frederick C. Erskine
Frederick C. Erskine
Chairman, Board of Agriculture

SHUNICHI KIMURA
MAYOR

EDWARD K. HARADA
CHIEF ENGINEER



BUREAUS AND DIVISIONS:

AUTOMOTIVE EQUIPMENT & MOTOR POOL
BUILDING CONSTRUCTION AND INSPECTION
PLANS AND SURVEYS
ROAD CONSTRUCTION AND MAINTENANCE
SEWERS AND SANITATION
TRAFFIC SAFETY AND CONTROL

COUNTY OF HAWAII
DEPARTMENT OF PUBLIC WORKS
25 AUPUNI STREET
HILO, HAWAII 96720

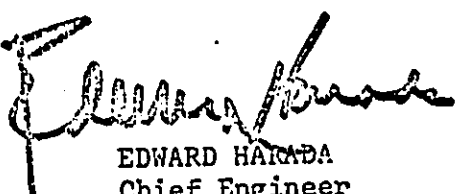
May 25, 1973

Dr. Richard E. Marland
Interim Director
Office of Environmental Quality Control
550 Halekauwila Street, Room 301
Honolulu, HI 96813

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE
PROPOSED KONA GOLF COURSE AT KEEI, SOUTH KONA, HAWAII

Thank you for the opportunity to offer comments on the subject draft statement.

This department supports the Department of Parks and Recreation's proposed golf course project. One minor comment, as a matter of clarification, is the addition of the words "access road off" between the words "abut" and "Puuhonua" in the second line of the second paragraph under Sight Description - Location. The golf course site abuts the proposed access road off Puuhonua Road and not the existing Puuhonua Road itself.


EDWARD HARADA
Chief Engineer

cc: Mayor Kimura
Dept. of Parks & Recreation
Planning Department

UNIVERSITY OF HAWAII

Department of Civil Engineering

MEMORANDUM

May 25, 1973

MEMO TO: Richard E. Marland
Interim Director, OEQC

FROM: R. H. F. Young ^{EAJ}
Associate Professor

SUBJECT: Draft EIS for Kona Golf Course

The statement indicates a need for importation of top soil and sand for construction of the golf course. The location of the borrow areas for these materials and the impact on the environment removal of the borrow merits as much concern as the need for and impact of the golf course itself.

Some additional clarification on the total membership in the golf clubs represented by the Hawaii Island Golf Association and the estimated active and potential golfers who would use the new facility would be helpful.

UNITED STATES DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE

440 Alexander Young Building
Honolulu, Hawaii 96813

May 22, 1973

Dr. Richard E. Marland
Interim Director
Office of Environmental
Quality Control
550 Halekauwila St.
Honolulu, Hawaii 96813

Dear Dr. Marland:

Subject: Draft Environmental Impact Statement for the
Proposed Kona Golf Course at Kei, South Kona,
Hawaii

This well prepared statement has been reviewed in this
office.

The statement recognizes and provides for control of the
hazards involved in grading and movement of soil. We
would expect no adverse effects on natural resources if
the project is carried out as described.

We appreciate the opportunity to review and comment on
this proposed project.

Sincerely,

Fred Haughton
Fred Haughton
State Conservationist





PODED-P

DEPARTMENT OF THE ARMY
HONOLULU DISTRICT, CORPS OF ENGINEERS
BUILDING 96, FORT ARMSTRONG
HONOLULU, HAWAII 96813

18 June 1973

Office of Environmental Quality Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Gentlemen:

We have reviewed the Draft Environmental Impact Statement for the Proposed Kona Golf Course at Keei, South Kona, Hawaii and have the following comments.

Response on Functional Areas of Responsibility of the Corps of Engineers.

The final EIS should describe the irrigation and drinking water budgets of the proposed project and the available water resources of the area in order to assure that sufficient water supplies are maintained. This concern is raised because the draft EIS indicates that sufficient drinking water may not be maintained if full allowable development occurs in the area (draft EIS:5, footnote 3).

The final EIS should describe the proposed sewage treatment facilities and provide assurances that the quality of coastal waters will not be degraded by effluent discharge.

The final EIS should describe the types, application rates, and handling procedures of fertilizers, fungicides, herbicides, and insecticides to ensure that nearshore water, ground water, and soils are not contaminated and that workers are protected.

The final EIS should describe the location of borrow sites and the measures to be taken to prevent erosion at the borrow and project sites.

Response on Public Disclosure Aspects.

The final EIS discussion of costs (draft EIS:4) should include a statement of projected user costs of the facility. The public costs of providing such a facility should be discussed with regard to other recreational needs of the area. The costs of golf equipment and a discussion of residents' abilities to pay should also be included.

PODED-P
Office of Environmental Quality Control

18 June 1973

In the final EIS the need of West Hawaii residents for a golf course should be specifically assessed in comparison with other public recreation needs which have been identified for the area. The use of SCORP as justification for a controversial project with potential development impacts is questionable. Localized resident surveys designed to provide information on needs and opinions regarding the specific project would assist in resolution of the controversy.

Adverse effects on the social environment from the project should be more fully considered in the final EIS. In particular the impacts of development which may be associated with the construction of the golf course should be stated. The effects of State and County zoning of the area should be made clear since the project will be in an Agriculture Land Use District yet the county has general-planned the area for urban and resort uses (draft EIS:12). This apparent land use planning conflict should be resolved for the benefit of social impact assessment in the final EIS.

The final EIS should include, as an alternative, a recreation project which does not include a golf course and which fulfills other public recreation needs of the area.

Sincerely yours,



BERNARD J. ROTH
LTC, Corps of Engineers
Deputy District Engineer

UNIVERSITY OF HAWAII

Environmental Center

Office of the Director

June 19, 1973

TO: Richard Marland
FROM: Jerry M. Johnson
SUBJECT: EIS for Kona Golf Course

I have attached a WRRRC review of the draft EIS for your information.

Our additional comments relate specifically to two areas of concern: the erosion hazard involved in placing the thin layer of top-soil on the exposed pahoehoe and the impact of cover material removal on the borrow areas.

The erosion hazard of the Waiaha soils is described as moderate. The potential for erosion from the imported top-soil layer to be placed over the bare pahoehoe would be somewhat greater. Acting as a perching member the pahoehoe underlying the imported soil would tend to retard the rate of surface water percolation. During periods of high intensity rainfall, the soil may become saturated and therefore more prone to erosion. Eroded soil may then be transported to coastal areas.

We recommend that imported soil be provided plant cover as quickly as possible. In addition, if the project is approved, it is advisable that this construction be carried out during the drier season.

The impact of the soil removal from the borrow areas has not been discussed. Yet, 275, 000 to 300,000 cubic yards of soil, sand and possibly cinders will be needed. The impact of that amount of cover material removal on borrow areas needs to be assessed before the total environmental impact of the proposed project can be adequately evaluated.

Jerry M. Johnson (BRS)

Jerry M. Johnson.
Assistant Director

Attachment
cc: R.H.F. Young
WRRRC

UNIVERSITY OF HAWAII

Water Resources Research Center
Office of the Director

MEMORANDUM

June 12, 1973

JUN 14 1973

MEMO TO: J. M. Johnson
FROM: R. H. F. Young ^{PHD}
SUBJECT: Comments on EIS: Keel Golf Course

1. Water Quality

The Kona Coast on the leeward side of Hawaii from Kawaihae to Hoo-kena contain many submarine springs along the shoreline areas. During the development and subsequent dredging of Honokohau boat harbor by the harbors division, fresh water springs on the sides of the harbor entrance were seen. Stearns reported that Keauhou Bay had two springs that yielded 75 GPM (108,000 GPD) at low tide and Honaunau Bay had a spring yielding 243 GPM (350,000 GPD) (H. T. Stearns and G. A. MacDonald, "Geology of Ground-water Resources of the Island of Hawaii", Honolulu: Territory of Hawaii, Division of Hydrography, 1946). With a high soil porosity and the proximity of the course to the coastal waters, fresh water percolating to the basal ground water supply will eventually enter the ocean.

Because of the uncertainty of the groundwater hydrology, more consideration should be given to the type of insectide applied to the golf course. Benzene hexachloride and its gamma isomer, Lindane, are classed as persistent chlorinated hydrocarbons. They are slow in being biodegraded, and are toxic to fish and other aquatic life and should not be used where there is any possible entry into coastal waters.

Reference has been made to the golf courses at Keauhou and Mauna Kea and the fact that the water quality has not appeared to have been affected detrimentally. Has any water quality sampling been done to support the statement or is this a generalized presumption?

2. Demand for Golf Course

The economic justification for this golf course project is based on a notion that golfing is a "suppressed" recreational activity. That is, participation is limited to a few because of the general lack of facilities at user costs within the budgets of many "residents throughout the State (who) express a desire to try...." (p. 3). References are made to the SCORP studies (1969 and 1971) and other

planning documents to promote golfing in general but little hard evidence is taken from these documents to show the specific need for the proposed project in Keel.

There are seven golf courses on the Big Island. Only one is wholly public, the Hilo Municipal Golf Course. All the others are privately run but nevertheless open to the public for play at higher user costs than the Hilo Municipal Golf Course. The EIS should provide statistics on public participation rates at all these courses to demonstrate the general lack of facilities. Projections should be made to show how bad the situation is expected to become in the future both with and without the proposed project.

It might be useful to test the so-called "suppressed" demand for its actual existence by an experimental program of subsidizing public participation on private courses at equivalent fees to the Hilo Municipal Golf Course. Such an experimental program should be allowed to run for a sufficiently long period to allow the expressed preferences to run its course for perhaps 2-3 years, with full publicity of the opportunities to participate but without promotion above that normally given for the Hilo Municipal Golf Course. In the Kona area such arrangements should be attempted at both the Mauna Kea and Keauhou Golf Courses in order to provide for a range of choices.

Subsidy rates should bring the user costs to the anticipated fee levels at the proposed new Keel course. Care, however, should be taken not to have all the subsidy payments go the participating private courses. Equitable cost distribution arrangements should be negotiated with the respective private clubs in order to prevent unjust benefits to the private clubs at the expense of the general tax payers.

In short, not enough evidence is given to justify public expenditure of 1.5 M (1/2 County, 1/2 State) and presumably all the operating costs by the County. Very likely much less than 50% of annual operating costs will be covered by revenues and over the long haul fees must be steadily increased. What then will happen to the so-called "suppressed" demand?

JOHN A. BURNS
GOVERNOR



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813

E. ALVEY WRIGHT
ACTING DIRECTOR
LAWRENCE F. O. CHUN
DEPUTY DIRECTOR
MUNNY Y. M. LEE
DEPUTY DIRECTOR
DOUGLAS S. SAKAMOTO
DEPUTY DIRECTOR

IN REPLY REFER TO:
ATP 8.2274

June 27, 1973

M E M O R A N D U M

TO: DR. RICHARD E. MARLAND, INTERIM DIRECTOR
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

FROM: E. ALVEY WRIGHT, ACTING DIRECTOR
DEPARTMENT OF TRANSPORTATION

SUBJECT: DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE
PROPOSED KONA GOLF COURSE AT KEEI, SOUTH KONA,
HAWAII

We have reviewed the subject draft environmental statement and following are our comments:

1. Page 4 - comparable cost (fee) of other private golf courses should be noted. What is anticipated charges (fee) for the proposed development?
2. Page 5 - location of spurroad to serve development should be shown on the plans. What is overall project cost and schedule?
3. Page 8 - attach land use and zoning maps for references.
4. Page 10 - no mention of Air and Dust Pollution Controls.
5. Page 12 - isn't a golf course proposed under the State Development Plan for Kealakehe?
6. Appendix - attach island location map.
7. Plans for the golf course should be coordinated with the planning project for the Hawaii Belt Road, Kainaliu to Papa.

E. Alvey Wright
E. ALVEY WRIGHT

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 15th AIR BASE WING (PACAF)
APO SAN FRANCISCO 96553



REPLY TO
ATTN OF: DE

8 JUL 1973

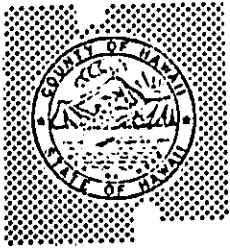
SUBJECT: Draft Environmental Impact Statement

TO: Office of Environmental Quality Control
Office of the Governor
550 Halekauwila Street
Tani Office Building, Third Floor
Honolulu, Hawaii 96813

1. Reference is made to your letter of 17 May 73, subject as above.
2. This office has no comment to render relative to the draft environmental impact statement for the Proposed Kona Golf Course at Keeli, South Kona, Hawaii.

A handwritten signature in cursive script, appearing to read "Allan M. Yano".

ALLAN M. YANO
Asst Dir Comd for Civil Envtl



COUNTY OF
HAWAII

PLANNING DEPARTMENT

25 AUPUNI STREET • HILO, HAWAII 96720

SHUNICHI KIMURA
Mayor

RAYMOND H. SUEFUJI
Director

May 22, 1973

Dr. Richard E. Marland
Office of Environmental Quality Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Thank you for the copy of the draft EIS for the proposed Kona
Golf Course at Kei, South Kona.

We have no comments to offer.

Sidney M. Juce

Raymond H. Suefuji
Director

McG:mh

HAWAIIAN TELEPHONE COMPANY

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June 7, 1973

Dr. Richard E. Marland
Interim Director
Office of Environmental Quality Control
550 Halekauwila Street
Tani Office Bldg., Room 301
Honolulu, Hawaii 96813

Subject: Draft Environmental Impact Statement for: The Proposed Kona Golf Course at Kei, South Kona, Hawaii

Ref: Your Memorandum dated May 17, 1973

Dear Dr. Marland:

We have reviewed the Draft Environmental Impact Statement and have no objections to the project, nor to the content of the Environmental Impact Statement.

Very truly yours,

R. Mau
Richard Mau
General Outside Plant Engineer

HAWAII LEGAL SERVICES PROJECT
LEGAL AID SOCIETY OF HAWAII

SUITE 208 HILO PLAZA
180 KINOOLE STREET
HILO, HAWAII 96720
TELEPHONE 935-5265

OAHU
SUITE 201, COMMUNITY SERVICE CENTER BLDG.
200 NORTH VINEYARD BOULEVARD
HONOLULU, HAWAII 96817
TELEPHONE 536-4302

KAUAI
KAUAI CIRCUIT COURT BLDG.
1019 UMI STREET
LIHUE, KAUAI, HAWAII 96766
TELEPHONE 241-2781

MAUI
2287 MAIN STREET
WAILUKU, MAUI, HAWAII 96793
TELEPHONE 244-5356

June 15, 1973

Mr. Richard E. Marland
Interim Director
Office of Environmental
Quality Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Mr. Marland:

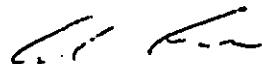
Re: Kona Golf Course at Keeli,
South Kona, Hawaii

Thank you for sending to me, for review and comments,
the draft environmental impact statement for the Kona Golf
Course at Keeli.

I have been contacted by low-income people in Kona
who are very much opposed to the golf course being built
at Keeli. My examination of the impact statement has,
therefore, been more critical than might otherwise be the
case. Nevertheless, even from an objective standpoint
the statement seems to be inadequate in numerous respects.

For a project that has raised such strong feelings of
opposition, I would hope that a much more thorough study
would be in order. As presently constituted, the impact
statement would almost certainly face a court challenge.
Hopefully this can be avoided by efforts through your
office to insure an adequate and objective final draft of
the impact statement.

Yours truly,



ANDREW LEVIN
Resident Counsel

AL:svk

HAWAII LEGAL SERVICES PROJECT
LEGAL AID SOCIETY OF HAWAII

SUITE 208 HILO PLAZA
180 KINOOLE STREET
HILO, HAWAII 96720
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OAHU
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200 NORTH VINEYARD BOULEVARD
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TELEPHONE 116-4102

KAUAI
KAUAI CIRCUIT COURT BLDG.
3019 UMI STREET
LIHUE, KAUAI, HAWAII 96746
TELEPHONE 241-2761

MAUI
2287 MAIN STREET
WAILUKU, MAUI, HAWAII 96793
TELEPHONE 244-5356

July 11, 1973

Mr. Richard E. Marland
Office of Environmental Quality Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Re: Environmental Impact Statement on
the Keeki Golf Course

Dear Mr. Marland:

Thank you for your letter of June 26, 1973.

I believe that the analysis of the above Environmental Impact Statement submitted by Life of the Land, and the article entitled "Impact Study Lacks Honesty" which appeared in West Hawaii Today on June 7, 1973 (a copy of which is attached), thoroughly cover the inadequacies of the draft statement. I would therefore defer to those two opinions, as anything further would probably cover the same ground.

Yours truly,



ANDREW LEVIN
Resident Counsel

AL:svk

cc: Dept. of Parks and Recreation

study lacks honesty

THE ENVIRONMENTAL impact statement prepared by the Kailua County Planning Department on the proposed Keel golf course is essentially an argument in favor of construction rather than an objective look at the possible effects the recreational facility will have on South Kona. And the County Planning Commission, which has before it a request for a special permit for the golf course, should refuse the permit until an honest, thorough study is completed by an independent agency.

The two major faults in the study are its incompleteness and lack of factual material, and its erroneous conclusion that other projects planned for South Kona will have as much, if not greater, impact on the area as the golf course.

ALTHOUGH the study lists other projects proposed for the area, it contains no information on when these projects will be completed.

The omissions were probably not accidental, since some of the projects are very long-range and dependent upon a healthier fiscal situation on both the county and state levels.

One such proposed project is the Kealahou State Historic Park. A bay was designated as an underwater park by the state legislature in 1970 and according to the impact statement, funds (but not very much) were allocated.

BUT THE MOST glaring omission of the study are plans by Bishop Estate to develop an area it owns in Honanau as a resort. The County General Plan designates the land for resort development.

In a recent news story, an official for Bishop Estate said development will not begin for another five years. He said the estate is negotiating with a Mainland firm to develop 1,141 acres of estate-owned land as a resort.

The impact statement makes no mention of the proposed development.

Since the proximity of Bishop Estate is essential to the development of the golf course and the beach park at nearby Palomono Point, the study obviously could not ignore plans for the resort development. The estate has agreed to loan the county some \$20 million.

NO GAS TODAY — K. Wakayama, owner of the K&W Chevron Service Station in Waimea has approached the gas shortage with a sense of humor. When he runs out of gas, he simply covers his pumps as shown above. The pumps at the station were covered the last four days in

May when the station ran out of gas until its June supply was delivered. Other stations in West Hawaii are refusing to sell gas to non-regular customers and many are closing early and on Sunday because they have already sold their allotted supply for the day or week. —WHT Photo

today

Vol. 10 — No. 23 Thursday, June 7, 1973 15 Cents

County plans Kona to Hilo bus service

A COUNTY-operated bus service between Kona and Hilo along the northern route, with stops at points in between, may be

operational within six months at a cost of about \$4 million for a round trip.

Newly-hired mass transit director for the County of

Hawaii, Walton E. Woods, said the county plans to contract the rural service to a private bus company. Bids will probably be

advertised later this month and opened within 45 to 60 days.

The rural service is the first of three phases in the county's long-range mass transit system. Phase two will be the inauguration of bus service in Hilo, but this operation won't begin until after the county purchases its own buses.

ALTHOUGH a firm schedule has not been adopted, the rural bus service will originate in Kona and travel to Hilo, returning on the same day.

A one-way trip will cost about \$2 and a round-trip \$4.

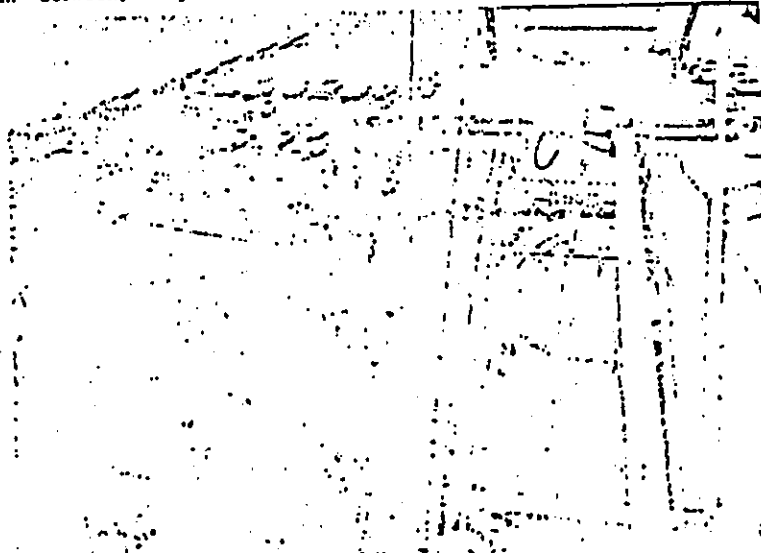
Here is the tentative schedule:

—Leave Captain Cook at 6:30 a.m., return at 4:30 p.m.

—Leave Kailua at 7 a.m., return at 4 p.m.

—Leave Waimea at 8:30 a.m., return at 2:30 p.m.

—Arrive Hilo at 10 a.m., leave on return trip at 1 p.m.



IT'S A LONG WAY UP — Several thousand persons flocked to the old Kona airport last weekend for the annual Kona Lions Club Carnival in ride the E.K. Fernandez vehicles. This shot was taken from atop the ferris wheel, a perennial favorite. —WHT Photo.

quietly buying property

FOR MORE THAN six months, Japanese interest have been purchasing large tracts of property in Kona, but because the corporations and their local representatives are fearful of adverse publicity, most have gone unreported.

The exceptions, of course, were the larger purchases of the former William A. (Doc) Hill property at Keauhou Bay and the home of the late Gen. Erik H. Nelson.

Total purchase price for these two properties was in excess of \$2 million.

MARK ONAKA of Gold Coast Realty and Surizo Nakashima have acted as agents for Japanese interest, but neither is willing to talk about the deals.

Mr. Nakashima is known to be involved in a large purchase near Kailua, but has requested no publicity be given the sale until development plans are announced.

Mr. Onaka has confirmed he is involved in purchases being made by Taiyo Fudasan Kogyo Co., Ltd., of Yokohama, Japan, but has declined to give details of the purchases.

Last weekend, officials of the Japanese firm were in Kona with State Sen. Stanley Hara, who apparently is not directly involved in the purchases, but who was serving as host to the group.

IT IS now estimated that Kogyo has purchased or is in the process of buying at least 50 acres of land in Kailua and Kona at an estimated value of \$5 million.

Eventually, all of the facts will become available as the land deals are registered with the State Department of Regulatory Agencies.

In addition to the Hill and Nelson properties, Kogyo is reported to have acquired or to be in negotiations for the following property:

—A one-acre lease which is the site of Rufus Spelling's former home. The property is located near the Hill residence. Price is reported at \$100,000.

—32 acres mauka of Kahaluu Beach, probably the Gomes property, near the Kamehameha Development Co. Purchase price is reported at about \$1.5 million.

—5.3 ACRES fronting the

Kooi study not objective

FROM PAGE ONE
 acres at \$1 a year for 55 years. The golf course will be one time to pay this land.
 The estate has also agreed to have the county acquire the Palomares Point and give the county a three-year time period in which to exercise an option to purchase the property and appraised value. That point the first three years would apply to the purchase price.
 Since Bishop Estate is by law in the business of making a profit with which to operate King Kamehameha School, it is safe to assume the trustees would be so generous if the estate was not to obtain a long-term economic benefit.

AND NOW TO THE erroneous conclusions:
 The projects now planned for the Kooi area include the state underwater park, improvement of the road from Mamalahoa Highway to

Napepe Bay, widening of the Puhimua road, extension of the water system to South Kona and the Palomares Point park.
 It is difficult to see how any of these projects could have any real, significant social or much economic impact on the area.
 The road improvement project will make the area more accessible, but their impact will probably not be very significant if the golf course is not in existence.
 Extension of the water system will probably result in some additional home construction, but to say it will have the same or greater impact on the golf course is an exercise in imagination.

As for Palomares Point, it is doubtful Bishop will be willing to give up the land without greater compensation unless the golf course is constructed.

THE STUDY does admit the golf course will cause some disruption, but

passes off the changes such a territorial development will have on the life styles and property values with that simple statement.
 The study also says construction of amenities to serve the golf course would cause some adverse effect, but did not in-

Bus . . .

FROM PAGE ONE
 The bus will also make stops in Hanalei and other points on the Kooi Coast.
 The service is tentatively planned to operate five days a week.

DURING THE fiscal year beginning July 1, the Mayor Chiechi Kuniura has asked for \$200,000 for the mass transit system.
 The county is also receiving \$223,699 from the federal government.

Later this year, Mr. Woods said, the county hopes to purchase 10 21-passenger buses and five 15-passenger buses.
 Cost of the larger buses are estimated at \$79,000 and the smaller vehicles will probably cost around \$20,000.

investigate the matter any further.

It is obvious to even a layman that pressures for the construction of condominiums and apartments adjacent to the golf course will be strong.

Although much of the land surrounding the golf course is now zoned in agriculture, it only takes planning commission and council action to change the designation.

Regardless of the conclusions of any study, the price of land in South Kona will increase significantly if the golf course is constructed and the pressures for urban development will increase at least 10-fold.

IN AN EFFORT to minimize the effects the

Land . . .

FROM PAGE ONE
 Casa de Emdeko for a purchase price of \$2.3 million plus. The deal involves four parcels.

Another major Japanese company is reported to be making purchases in Kona, but to date the company and its activities have been able to remain unknown to the public.

course would have on land values, the writers of the statement checked with the Hilo Tax office and reported that the office "revealed that persons living around the Hilo Municipal Golf Course are not directly affected by proximity to the golf course in the assessment of the value of their property" — which is probably true since the course was built in an essentially urban area.

Land prices in Kona subdivisions are basically

stable and will probably remain so. Speculation is rampant, however, in the raw land market.

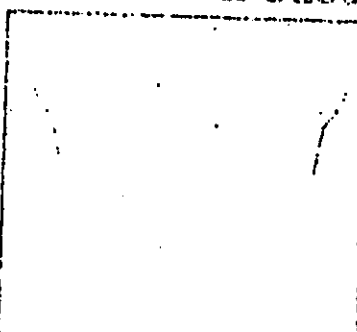
There are many more holes in the impact statement.

However, the above are probably the most glaring. If an impact statement is undertaken, it may well be the county can present a solid case for construction of the golf course.

But based on the current study, the county's argument is pretty flimsy.

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The Gemstone Shop
 SEASIDE HOTEL SHOPS 1001 KONA BLVD.

from the coconut wireloss

(A column of concerned, casual and caustic commentary.)

NO TRAIN MAKERS—The Kona Lions Club, number one in the State of Hawaii, has just successfully completed its annual community project—Kona rain. It happens every year without fail. The day the Lions open their annual carnival, Kona is drenched with rain, which, incidentally, was not welcome this year, since it put an end to the drought which plagued the district since last November.

NO TONG FOR GOVERNOR—Senator Hiram L. Fong announced last week he definitely would not give up his congressional seat to run for governor in 1974—a move he said he was considering.

Many observers interpret the move as a signal that former Gov. William F. Quinn, defeated 10 years ago by Gov. John A. Burns by a narrow margin, is considering cutting out of retirement and making the governor's race. Meanwhile, Robert Fukuoka, the outspoken United States attorney for Hawaii, who recently resigned, announced last week he may run for lieutenant governor, particularly if Mr. Quinn enters the campaign.

However, he appeared less enthusiastic about his possible candidacy if State Senator Andy Anderson or Fred Kelling were GOP gubernatorial candidates.

Lava rock boom . . .

OH, JUST BOUGHT SIGHT UNSEEN—The state has finally begun to move against Honolulu firms promoting land sales in the Kāʻiʻa-Pūna area, often through the use of mid-air advertising.

Circuit Court Judge Maato Del has issued a preliminary injunction against International Syndications, Inc., a land investment firm which has been promoting lots located 30 miles south of Kona near Hawaiian Ocean View Estates in Kāʻiʻa.

The court action was initiated by the State Consumer Protection Office after it received complaints from investors.

It is estimated the firm has sold \$2 million in real estate since it went into business 10 months ago, selling at a one per cent undivided interest for 21-acre parcels at about \$2,000.

A hearing will be held later to determine whether or not

SIDE GLANCES

by Gill Fox



"NOW will you believe what Walter Cronkite has been telling you?"

a permanent injunction should be issued by the court. **QUINCY TIME** state needs laws which would place more control over the alienation of real estate through state-wide and out-of-state promotions.

One Honolulu firm continuously advertises property in Kāʻiʻa, using a map of the Kāʻiʻa coast which shows Ke-Alole Airport and the Kona Coast and touts the economic boom taking place in Kona. The implication is that one is buying land adjacent to a booming tourist area where future prosperity is assured.

What the advertisement neglects to point out, however, is that the subdivision is 40 miles from Kona and connected by some of the worst roads in the state.

Only a person unfamiliar with the Big Island would purchase a house lot in a remote area like Kāʻiʻa on a lava flow thinking he was near a populated, booming area.

This advertisement, and several others that have been shown on television, are obviously deceptive and the state ought to take measures to prevent such practices.

Dent logic . . .

OIL, THE ICEMAN COMETH—In its environmental impact statement on the proposed Keel golf course, the county argues in favor of the course's construction by saying: "Golf is one of several recreational activities regarded as 'suppressed' in that participation is limited by the supplies of facilities."

The statement goes on to say that a 1971 state study (SCOTF) to determine the recreational requirements of Hawaii residents concluded: "Residents throughout the state express a desire to try new activities," and on that list of activities was golfing, which was rated number six behind horseback riding, beach camping, tennis, sailing and mountain climbing.

The above list reflects a compilation of the state-wide surveys.

Another survey report in the same study dealing with totals from residents of the neighbor islands carries a list which set a different priority.

Number one on the list was a desire to "attend outdoor, cultural and educational facilities" with 17 per cent of those polled favoring this activity.

The recreational activity listed in third place was snow skiing, with 11 per cent of the respondents expressing an interest in trying the recreational activity.

Number 10 on the neighbor island list was golfing, with only seven per cent of those surveyed showing an interest. If the county was to follow the logic of its own argument

with 2-21 credits this issue with

HONOLULU Advertiser columnist Bob Krauss provided the information for the story on the recreation of the expedition made by Rev. William L. Dyer 100 years ago. The story ran Page 2 of this issue.

JETT GIBSON provided photographs of cast members in the upcoming production of "Plaza Suite" by the Kona Community Players, and Barbara Nott provided the publicity material.

in the impact statement, then it should dump plans of Keel and abandon all plans for a golf course.

In the news . . .

PRACTICE MAKES PERFECT—Last week, those involved in the recent disaster drill at Keolu Airport to test the response of the Kona hospital staff and other emergency facilities met at the hospital to evaluate their performance.

The conclusions: More first aid training is needed for airport personnel because of the time it takes for hospital personnel and doctors to arrive at the airport, primarily because of the distance involved.

That when a real emergency occurs, outside help will probably be needed because of the limited capacity of the hospital and the number of doctors available in Kona.

Other recommendations are needed: One doctor said he thought the person who called him about the drill said "Kehala" instead of "Ke-Alole."

Overall, the response to the drill was rated as excellent.

MURGER OFF—Apparently the merger between Sunset Coffee Cooperative and Pacific Coffee Cooperative has been abandoned. The merged co-op would have been known as the Kona Farmers Cooperative and a listing for it appears in the telephone book.

According to news reports, officials of both cooperatives were not inclined to discuss the reason why the merger was abandoned.

AGRICULTURAL TAX BREAK—Sometimes the most important pieces of legislation pass and are signed into law with little fanfare while less important items grab headlines.

Such is the case with an agricultural tax bill signed into law last week by Gov. John A. Burns. The law, sometimes referred to as the "green preserve bill" allows agricultural land to be taxed on the basis of its use rather than on the basis of the value of property surrounding it.

The legislation was sponsored by the Burns administration and is designed to keep farmers from being forced off their land by high taxes.

In the past, if a parcel of agricultural land was purchased and developed for urban use—such as a shopping center—the equivalent of adjacent town lots for tax purposes would automatically increase, often making it more economically attractive for the farmer to sell the remainder on the land.

Priorities on oil . . .

OIL, DOES THE GAS SHORTAGE SMALL FRY?—A news story appearing last week quoted Bob Merritt, assembly speaker in California, as saying oil companies are stockpiling unprocessed oil.

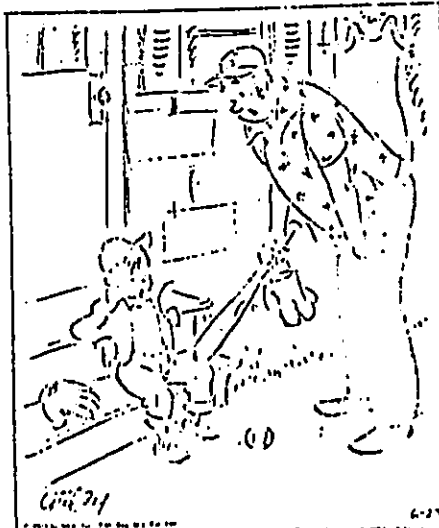
Mr. Merritt said there is evidence that while the country is suffering from a gasoline shortage, the stockpile of unprocessed oil has increased 20 per cent over last year.

"We have been led to believe by the oil industry," he said, "that there is a fuel shortage and that high gasoline

See page five

SIDE GLANCES

by Gill Fox



"What do you mean, you aren't going to play ball? Don't you want to grow up and see our products?"

JUN 13 1973

WEST HAWAII TODAY

PAUL NISHIMUTA
General Manager

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Editors: Don Eggerman
Circulation: Scotty Milne

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WESTERN MEDIA

JOHN A. BURNS
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HAWAII 96801

June 19, 1973

WALTER B. QUISENBERRY, M.P.H., M.D.
DIRECTOR OF HEALTH

WILBUR S. LUMMIS JR., M.S., M.D.
DEPUTY DIRECTOR OF HEALTH

RALPH B. BERRY, M.P.H., M.D.
DEPUTY DIRECTOR OF HEALTH

HENRI P. MINETTE, M.P.H., DR.P.H.
DEPUTY DIRECTOR OF HEALTH

MEMORANDUM

To: Dr. Richard E. Marland, Office of Environmental Quality Control

From: Acting Director of Health

Subject: Addendum to the Draft Environmental Impact Statement for the Proposed Kona Golf Course at Keeki, Hawaii

Comments from the Department of Health are as follows:

Air Sanitation

1. During the landscaping and construction phase of the development, no burning of waste materials will be permitted.
2. Although the location of the proposed development is somewhat isolated, care still must be taken to minimize the fugitive dust emissions during the landscaping and construction phases.

Sanitary Engineering

1. Care should be taken during construction to prevent erosion from becoming a major problem.
2. The type of sewage treatment for a comfort station will depend on the comfort station's location.

A handwritten signature in cursive script, reading "Wilbur S. Lummis, Jr.".

Wilbur S. Lummis, Jr., M.D.

SPARK M. MATSUNAGA
1ST DISTRICT, HAWAII

WASHINGTON OFFICE:
442 CANNON BUILDING
20515

HONOLULU OFFICE:
218 FEDERAL BUILDING
96813

Congress of the United States
House of Representatives
Washington, D.C. 20515

DEPUTY MAJORITY WHIP

MEMBER
COMMITTEE ON RULES
COMMITTEE ON AGRICULTURE
STEERING COMMITTEE

June 18, 1973

Dr. Richard E. Marland
Interim Director
Office of Environmental Quality Control
550 Halekauwila Street
Honolulu, Hawaii 96813

Dear Dick:

Thank you for your communication regarding the environmental impact statement for the proposed golf course at Keei, South Kona, Hawaii.

I appreciate your thoughtfulness in providing me with this information and keeping me informed of the merits of the proposed golf course.

Aloha and best wishes.

Sincerely,


Spark Matsunaga
Member of Congress

JOHN L. MCCLELLAN, ARK., MAN
 WARREN G. MAGNUSON, WASH.
 JOHN C. STENNIS, MISS.
 JOHN D. PASTORE, R.I.
 ALAN BIRLE, NEV.
 ROBERT C. BYRD, W. VA.
 GALE W. MC GEE, WYO.
 MIKE MANSFIELD, MONT.
 WILLIAM PROXMIRE, WIS.
 JOSEPH M. MONTOYA, N. MEX.
 DANIEL K. INOUYE, HAWAII
 ERNEST F. HOLLINGS, S.C.
 BIRCH BAYH, IND.
 THOMAS F. EAGLETON, MO.
 LAWTON CHILES, FLA.
 MILTON R. YOUNG, N. DAK.
 ROMAN L. HRUSKA, NEBR.
 NORMIS COTTON, N.M.
 CLIFFORD P. CASE, N.J.
 HIRAM L. FONG, HAWAII
 EDWARD W. BROOKE, MASS.
 MARK O. HATFIELD, OREG.
 TED STEVENS, ALASKA
 CHARLES MC C. MATHIAS, JR., MD.
 RICHARD S. SCHWEIKER, PA.
 HENRY BELLMON, OKLA.
 THOMAS J. SCOTT, CHIEF CLERK
 JAMES R. CALLOWAY, COUNSEL

United States Senate
 COMMITTEE ON APPROPRIATIONS
 WASHINGTON, D.C. 20510

June 19, 1973

Dr. Richard E. Marland
 Interium Director
 Office of Enviromental Quality Control
 550 Halekauwila Street
 Honolulu, Hawaii 96813

Dear Dr. Marland:

I am writing to acknowledge receipt of the addendum
 to the Draft Environmental Impact Statement for the Proposed
 Kona Golf Course at Keeki, Hawaii.

Your courtesy in sending me this addendum is ap-
 preciated.

With kind regards and aloha,

Sincerely yours,

Hiram L. Fong
 Hiram L. Fong

HLF:vlh

June 15, 1973

Richard E. Marland, Interim Director
Office of Environmental Quality Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Mr. Marland,

The Captain Cook Community Association Board of Directors has reviewed as individual Directors and discussed as a body the Environmental Impact Statement for the Kona Golf Course, Keei, South Kona, Hawaii.

The proposed golf course at Keei and proposed park at Palemano Point have been two goals toward which the Captain Cook Community Association has strived for a number of years. This Association has felt that these are two very needed recreational facilities for this area. In reading the Environmental Impact Statement, it clearly shows that there is little harm and a great deal of good to come in the development of the golf course. No where in the document is there anything which points to hurting the interests of a single individual. It may change the life style slightly and, perhaps, the surrounding environment of a few, but in no harmful way. In fact, it can do nothing but help to make living a little more convenient and a little easier for those affected. The benefits that a golf course and a park will bring to many, many people of South Kona, and of North Kona, are tremendous. Golfing for the permanent residents of Kona is almost nonexistent. These enthusiasts are priced out of the private courses and, soon, those few who can afford it will be forced out by lack of playing space because of priority to hotel guests.

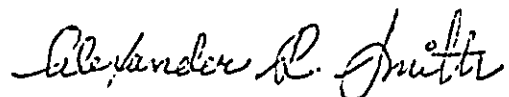
This Association cannot understand the motives of those very few individuals who are so vocal in their opposition to these projects. They cannot argue that it will hurt anyone and their position that it should be in the North Kona area near Kailua is certainly not to the benefit of the present true residents of the Kona area and could only benefit the influx of new residents of future years. We sometimes wonder about the objectives of these individuals as they are the same vocal objectors to every project that is presented to the community. To bow to their vocalism at every step would bring any progress, any improvements, any benefits to the residents, to the young people, to the area, itself, to a complete standstill.

Richard E. Marland, Interim Director
June 15, 1973
Page 2

This body has gone on record as agreeing with the Environmental Impact Statement for the Keei Golf Course and urging the government of the County of Hawaii to take immediate steps to implement the construction of both the golf course and Palemano Park.

Yours very truly,

CAPTAIN COOK COMMUNITY ASSOCIATION



Alexander R. Smith, President

ARS/nhc



Wednesday 13 June 1973

Dr. Richard Marland
Interim Director
Office of Environmental Quality Control
550 Halekauwila Street, Room 301
Honolulu, Hawaii 96813

Dear Dr. Marland:

Life of the Land is pleased to supply these comments in regard to:

Environmental Impact Statement
Kona Golf Course
Kee1, South Kona, Hawaii.

1) Life of the Land supports and agrees with the analysis of this E.I.S. presented to your office by the Kona Conservation Group through its president, Slim Tyler. It behooves your office to look carefully and seriously at the objections to the project from these local residents. They seem to have a much greater grasp of what the impact will be on this area than the County's Department of Parks and Recreation.

2) On page 1, paragraph 2, the E. I. S. states: "Public recreation areas and facilities are seriously lacking in the West Hawaii region. . ." We agree with this statement. However, the E.I.S. goes on to say that the golf course would, in part, "help to correct the region's recreational deficiency. . ."

We do not believe that this statement follows logically from the first. The E.I.S. presents no evidence that a golf course would be a desirable recreational facility given the life-styles of the people in the area. Golf is not the answer to the recreational problems of the area. Golf may not even be part of the answer. In any event, the County should demonstrate the need for this golf course, not assume it.

3) On page 2, paragraph 2, the E.I.S. refers to a joint State-County memorandum outlining a planning study for the Kealahou area. "The memorandum states in part that "(the coastal areas from Kaawaloa to Honaunau) should be developed under a common plan."

Why, indeed, was this not done? This golf course appears to be conceived with no relation what-so-ever to existing or planned uses of the area. The E.I.S. makes no mention of the resort and commercial developments that are now being considered for the area. More importantly, in ignoring such development plans,

Keel E.I.S.

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the E.I.S. fails to consider the catalyst effect the golf course will have in encouraging development in the area.

4) On page 3, paragraph 8, the E.I.S. states: "In the past decade golf has become an increasing popular sport with all segments of the population on both a national and state level."

First, we question the term "all segments" in this context. It is much more broad reaching than it deserves to be. Everyone is not interested in golf. In this group we find particularly those of a low and low-to-middle income bracket. To play golf, one needs money. While the E.I.S. discusses on page 4 the matter of the reduced green fees and other expenses at a public course, these are not the only expenses involved with playing golf. Everything from clubs to social considerations at the "19th hole" make this "suppressed sport" a very expensive one. Those who fish or pick coffee for a living will not be playing golf on this course even if the County lets them play for free.

Second, this course is not being built on a "national or state level." It is being built in South Kona. The popularity of the sport in the area involved must be demonstrated. The broad and over-generalized statement presented is not sufficient.

Accordingly, the following statement in the E.I.S., "As a result, there has been a corresponding demand and need for golf courses, especially public ones which enable people to participate at a minimal cost," is not sufficient. The need for a golf course in South Kona has not been demonstrated. The question of who it will "serve" remains unanswered.

5) On page 3, paragraph 9, the E.I.S. quotes from the State Comprehensive Outdoor Recreation Plan (SCORP). However, the County is very selective in what parts of SCORP it quotes from. The County implies that the SCORP considers golfing a "suppressed sport." This is not the case.

Indeed, golf is very far down on many of lists as a desirable recreational activity. The Kona Conservation Group presented some of the SCORP figures that the County ignored, in its E.I.S. analysis. We could quote numerous SCORP tables and charts showing the need for golf courses (and the interest in golfing) as quite low.

For example: On page 233, SCORP's Table 38 discusses the reason for non-participation in various activities. 82% of the respondents who listed golf as their favorite activity did not participate because they "didn't have enough time." Only 5% did not participate because there were "no facilities nearby."

And, while the E.I.S. quotes page xii of SCORP as listing "golfing as a new activity which residents throughout the state desire to try. . .", a more thorough investigation would lead on to page 234 of SCORP, Table 39. Here, under "new activities

Keel E.I.S.

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respondents desire to try," we find golf in a three-way tie for 10th place (among Neighbor Island respondents). Only 6% of them desire to try golf.

We leave it to your office and the County of Hawaii to revise the EIS so that a more balanced interpretation of SCORP is included.

6) On page 4, paragraph 7, the E.I.S. notes that: "tourists are given playing priority at private courses." Will resident golfers be given priority over tourists on this public golf course? If not, why not? It seems only fair considering the advantage tourists have on private courses.

7) Frankly, we do not see, as noted in point 4, who these golfers (local residents--not tourists) are who need this golf course. There are no studies presented, no figures, no estimates, no nothing.

It is enough to make us wonder if this County golf course is, too, going to be used by tourists, not residents.

8) On page 5, paragraph 4, the E.I.S. states: "The area will be covered with a minimum of eight inches of topsoil. . . . An estimated maximum of 270,000 to 300,000 cubic yards of top soil will be needed."

That, simply, is a lot of soil. The Governor's Executive Order of 23 August 1971 requires that "a detailed statement by the responsible official on the environmental impact of the proposed action" be prepared. This statement discusses none of the possible environmental impacts of either: 1) moving the soil into the golf course area, possible effects of run-off before stabilization with vegetation, effects on hydrology from the change in topography, etc., or: 2) removing the soil from wherever it will be removed from. The County does not even know where the soil will come from. This E.I.S. must be considered inadequate until the environmental effects of such massive soil movements are discussed.

9) On page 8, paragraph 5 and page 11, paragraph 11, the E.I.S. notes: "It was recommended that as many sites as possible be preserved and incorporated into the landscape of the golf course, regardless of the evaluation of the sites' value. . . . (T)he proposed Keel golf course would probably be the first of its kind with traps and obstacles which could incorporate archaeological phenomenon within its boundaries." "There will be minor impact on historic sites within the proposed site as most of them which were located during the survey will be incorporated into the landscape of the golf course."

The County's concern for historic sites seems to be less than serious.

Keel E.I.S.

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Use as an obstacle on the 14th fairway does not seem to be a proper or fitting way to display historic sites, regardless of the site's "value." The Kona Conservation Group reports to us that, in terms of historic sites: a) Kaawa Loa lies to the North; b) the City of Refuge to the South; c) Captain Cook's monument and the State's underwater park at Kealakekua Bay lie seaward and to the North; d) the course itself will cover part of the area on which the Battle of Mokuahae was fought.

All four of these sites are either under Federal or State protection, or there is active concern to place them under such protection. Their unique significance is readily known to the people of the area as well as to others throughout the State. If the concern is for historic sites, would not it make more sense to leave the area as is for now, hoping that at some time in the future we may be able to connect the valuable areas, rather than to separate them with a golf course and talk about historic sites and as "traps and obstacles."

Life of the Land holds this deep historic concern, and hopes that, with time, it will be shared by your office and the County of Hawaii.

10) On page 10, paragraph 4, the E.I.S. notes: "The area in which the proposed site is located is relatively undeveloped and the proposed recreational complex is expected to increase the number of people visiting the area, particularly on weekends."

This comment acknowledges a very important point, but does not go anywhere near discussing the environmental impact of this area population increase. Life of the Land considers this E.I.S. incomplete until it discusses the effect of increased population that will be brought to the area because of the golf course, as well as the effect of increased population that will be brought to the area because of the further development that will be brought to the area by the golf course.

11) On page 10, paragraph 6, the E.I.S. states: "Some effect on the groundwater hydrology of the area may occur. Because of limited information available on the groundwater system of the area, the extent of the possible effect is unknown. Most likely, if any effect does occur it would be due to the leaching of materials necessary to maintain the course, such as fertilizers and herbicides. Whether this would actually occur and whether these would actually reach the water table of the ocean has not been determined."

Life of the Land is happy that the County has been honest with this matter, however, such honesty in regard to a lack of knowledge in this area does not fulfill the requirements for preparing an environmental impact statement. The Governor's Executive Order requires a "detailed statement. . . on the

Keel E. I. S.

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environmental impact of the proposed action." The County has not supplied such a statement. The leaching of such materials to either the water table (read: the drinking water supply for the people of the area) or the ocean (read: the underwater park at Kealakekua Bay) could have serious environmental effects.

The County of Hawaii is required to discuss the impact on hydrology, as noted by the statement in the Governor's Executive Order noted above. The E.I.S. is incomplete until this discussion is included and commented on by the public and various interested agencies. If the County does not know about the hydrology and must make some studies--then so be it. Your office should inform them of this.

This, actually, is one of the purposes of the E.I.S. (That is), to gauge environmental impacts and problems before the proposed project is implemented. Life of the Land demands that hydrological studies be completed and included into the E.I.S. before it is approved.

12) On page 12, the E.I.S. discusses alternatives. Paragraph 4 on that page lists as the first alternative "not to develop the golf course." The County paints this as a most dismal picture. The E.I.S. declares: "This alternative may partially maintain the status quo of the area, but this is probably unlikely. It would also allow for no golf course or additional recreation opportunities in the area."

Page 2, paragraphs 12 and 13, and page 3, paragraphs 1 through 4 discuss the funding for this project. Some \$650,000 in State money and a similar amount in County funds have been appropriated. The list of other possible uses for such large sums of money is almost endless. The alternatives are many and the possibilities are great.

The State is now involved in what has been termed a "financial crisis." There have been cutbacks in teacher and supply funding by the Department of Education, lay-offs proposed for non-tenured faculty and the University of Hawaii, and cutbacks for various other departments and offices. If returned to the State treasury, the \$650,000 in State funds would no doubt be soon put to alternative uses.

Specifically in the South Kona area, \$650,000 or even \$1,300,000 could go a long way towards providing a competent, carefully detailed, community involved, and environmentally sound master plan for the area. Or providing for a detailed study, classification, and preservation of the historic sites mentioned in point 9. Or any of an number of important projects.

We do not expect the County to develop a detailed discussion and

Keel E.I.S.

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analysis along this line of thought for the E.I.S.: If carried too far, such consideration could become useless and approach meaninglessness. Yet, Life of the Land would like to see the County take a more positive stance in regard to alternatives, and not to imply that the money will be "wasted" if not used for this purpose, or that the area will be denied "recreational opportunities."

13) Page 12, paragraphs 5 through 7, and page 13, paragraph 1, discuss a second alternative, that of relocating the golf course to another area. The E.I.S. quickly rejects this alternative. Life of the Land notes, however, that the Kona Conservation Group in their analysis discuss a proposed Kealakehe sports complex as a possible alternative.

We ask that your office and the County look into this possibility and discuss it more fully as an alternative plan. The E.I.S.'s current discussion is inadequate.

14) On page 13, paragraph 2, the E.I.S. discusses the relationship between short- and long-term environmental uses. The E.I.S. states: "Golf courses are open space and in that sense positively enhance the ecology and natural beauty of the environment." While we agree that golf courses are "open space," Life of the Land is not convinced as to their value in "enhancing" ecology, natural beauty, or the environment. We think that this comment is particularly relevant considering that this land will move from one open space use, grazing (source: E.I.S., page 7, paragraph 4), to the new golf course use. It is our opinion that open space values are reduced in the move from pasture land to golf course land.

In the same paragraph noted, the E.I.S. states: "The greatest value of the proposed project is that a large area will be assured of being maintained as open space/or public use." We find this statement somewhat confusing. If the "greatest value" of this project is "maintaining . . . a large area . . . as open space for public use," there are much better ways to do it.

Life of the Land would like to suggest dedication to park use, continued grazing use, agricultural use, or a camping facility complex use as examples of such superior open space uses.

15) Page 13, paragraph 3, of the E.I.S. discusses any irreversible and irretrievable commitments of resources which would be involved in implementing the project. While almost anything can be reversed and reclaimed, many things can get so entrenched into patterns that it is impossible to bring them out. It is this type of resource that, indeed, it would be appropriate to discuss in this section.

Keel E.I.S.

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Life of the Land finds this section of the E.I.S. inadequate. Among the types of resources that will become entrenched in the project will be: money, energy, time, labor, land, top soil, and water. The E.I.S. would do well to discuss these resources and their commitment in both qualitative and quantitative terms.

And, perhaps, the golf course will serve as a catalyst toward moving the most important resource of all--the entire land area and its people--toward a future of "growth", "progress", and "development." Perhaps the County would care to attempt to consider the implications of this commitment of resources.

16) On page 13, paragraph 4, the E.I.S. provides^a social analysis. It first provides a two sentence discussion of opposition to the project. It then continues: "The objective of the project, however, is to provide additional recreation opportunities and facilities in the Kona area. It is expected that more persons will be able to participate in this suppressed sport if the facility were developed."

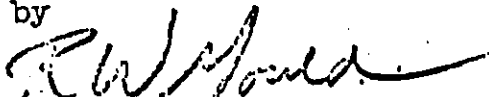
The County has, almost literally, ignored citizen objections to the project. The minutes of the County Planning Commission meeting on the matter show numerous well-presented testimonies from members of the Kona Conservation group, The Hawaiians--Kona Chapter, and various concerned private citizens.

The paragraph noted above should be read vary carefully. It seems indicitive of the County's attitude toward its citizens. Who is being suppressed?

Life of the Land believes that this E.I.S. should not be approved by your office. Total planning for the entire Kona Coast must ensue. We cannot allow the piece-meal demolition of this area-- a golf course here, a resort there, etc. The questions raised in this analysis, the planning implications for the entire coast, and the citizen objections must be dealt with--not ignored. A strong voice from your office may well lend a push in the right direction. Please kokua.

Aloha
Life of the Land

by


Robert W. Gould
Research Staff

rwg

cc: Slim Tyler, President
Kona Conservation Group
Captain Cook, Hawaii 96704

Final input on the Keel Kona Golf Course Impact Statement was received and compiled at the June 3, first-Sunday--of-the-month meeting of the Kona Conservation Group at which 36 attended.

Regarding the ALTERNATIVES section on page 12 of the impact statement:

1. They claim that Keel is more centrally located than is the alternate site/suggested by nine Kona organizations in preference to the Keel one. ^{at Keelakehe, just south of the Honokohau Small Boat Harbor and which was}

However, the location of the proposed Keelakehe Sports Complex is two miles from Kailua-- as opposed to Keel which is approximately 25 miles from Kailua! Therefor, which is more centrally located?

2. They further claim that a golf coruse near the Honokohau Small Boat Harbor might disrupt the historical landmark there.

However, according to their own County Planning Department maps, the Keelakehe Sports Complex, as proposed by the State in both 1962 and 1968 and for which County funds were appropriated, lies outside of and to the south of the Landmark area!

3. They proceed to attack the Keelakehe site by stating that, "The State may also have proposed plans for the use of their lands in this area."

The State most certainly does! It has long-planned a golf course (public) as part of its sport recreational complex there. (see the 123 page, KEELAKEHE DEVELOPMENT PLAN, by Charles Yoon & Assoc., 1968, prepared for the State Department of Land and Natural Resources.)

4. They conclude with the puzzling sentence, " If private lands were to be involved, acquisition costs may be prohibitive."

There are not now, and never have been, any private lands involved in the State plans regarding the Sports Complex at Keelakehe. That entire section is State-owned land.

5. The County has gone along with the State proposal to put the public golf course for Kona in the Keelakehe area. (In 1971 the County appropriated \$150,000. for the Keelakehe Sports Complex, which includes a golf course.)

Despite this, their KONA GOLF COURSE impact statement gives the impression that they know nothing about all of this.. and that the Keelakehe Sports Complex proposal never existed.

COMMENTS & QUESTIONS ON ENVIRONMENTAL IMPACT STATEMENT FOR
KONA GOLF COURSE, KEEI, SOUTH KONA, HAWAII

1. Page 1, Introduction, par. 2:

"Public recreational areas and facilities are seriously lacking in the West Hawaii region in relation to the size of the population."

Agree. But we must establish our priorities of what kinds of recreational facilities we need, and where, how large, etc. Golfing is a minority sport at tremendous cost.

2. Page 1, Introduction, par. 2:

"The proposed complex of which the golf course is a part would help to correct the region's recreational deficiency while being in a location more central to the existing population distribution."

Question: Is it a central location for Kona?

Doesn't South Kona, where the proposed golf course is to be located, have a proportionately higher percentage of low-income people (therefore, non-golfers) than North Kona?

3. page 2, par. 2:

"The West Hawaii Corridor Study states in part that "(the coastal areas from Kaawaloa to Honaunau) should be developed under a common plan" "It calls for the "development of a municipal golf course and recreation center in the area mauka of the present Food road."

This study and all other studies and plans for this area from Kaawaloa to Honaunau should be studied together and reviewed by the public. There should be agreement on the ~~plans~~ plans and coordination of all plans.

4. Page 3, Recreational Aspects, par. 2:

"Golf is one of several recreational activities which are regarded as 'suppressed' in that participation is limited by the supply of facilities. SCORP statistics show a low participation rate for golf. These statistics reflect the lack of golf facilities."

Is this reason, or do many people prefer other kinds of activities?

5. Page 3, Recreational Aspects, par. 2:

"The 1971 SCORP cites golfing as a new activity which "residents throughout the State express a desire to try...."

Page ~~111~~ 111 of SCORP says: "Residents throughout the state express a desire to try new activities. The following new recreation activities are desired: horseback riding, beach camping, tennis, sailing, mountain camping, golfing, fishing, skin diving, and water skiing."

~~XXXXXXXXXXXX~~ On page 254 of SCORP there is a table showing ~~NEW~~ ACTIVITIES RESPONDENTS DESIRE TO TRY, listing responses by State total, Oahu total, and neighbor island total. The neighbor island total

shows, in order of preference: ~~horseback riding, snow skiing,~~

1. attend outdoor cultural and educational facilities	- 17%
2. horseback riding	14
3. snow skiing	14
4. beach camping	10
5. attending outdoor concerts	7
6. bicycling	7
7. fishing - pier, shore	7
8. mountain camping	7
9. skin diving	7
10. golf	6
11. tennis	6
12. hunting	6
13. hiking	5
14. fishing - boat, deep sea	5
15. sailing	4
16. air sightseeing	4
17. waterskiing	0

6. page 4, first paragraph:

"The Palemano Point recreational complex is foreseen as the major beach and picnicking area for North and South Kona. ... (it) is expected to be used by residents from throughout the island as well as by visitors."

Is this what the people who back the park want? A big park like this?

7. Page 4, par. 4:

"One of the basic purposes of the proposed golf course at Keeli is to provide increased recreational opportunities in West Hawaii."

See #1 - question of priorities.

Also, what are the other basic purposes?

8. Page 4, par. 5:

re students paying - look up figures at Hilo Municipal Golf course.

9. Page 4; par. 6:

"The minimal costs at a public course can be expected to stimulate greater participation in the sport."

See #4.

10. Page 5, par. 7: and Page 10, par. 5:

"As part of the Kona water system, the Dept. of Water Supply plans to install a trunk line to service the Napoopoo area. The proposed clubhouse would most likely tap into this line for drinking water."

"Act 197, SLM 1971, made a \$550,000 appropriation to the DMR for the extension of and improvements to the South Kona water system along the lower government main road from Keokea junction towards Keeli. This project is now in the design stage for the pipeline and reservoir."

Question: Are two lines leading to the golf course?

11. page 7, Climate, par. 1:

"In fact, the prevailing wind pattern in Kona is a diurnal land and sea breeze circulation."

Question: What are the effects of development in the area ~~XXXX~~
in terms of air pollution? ~~XXXX~~

Respectfully Submitted,
Alan J. Juler, President K.C.G.

June 17, 1973

Dear Dr. Marland,

Please clip these on to the first increment
of materials we sent you.

Thank you,

Alan Tyler.

P. S. So that I can become more proficient at this in the future,
I would like to attend your workshop on E.I.S. this month. Can you
let me know right away if:

- 1) admission is open to conservation leaders?
- 2) will I have to pay all of my own expenses?

Looking forward to seeing you soon,

AT

12. Page 8, under Historic Sites, the quote from Anthropological Research International:

"With regard to golf courses in general - the proposed Keel golf course ~~XXXXXX~~ would probably be the first of its kind with traps and obstacles which could incorporate archaeological phenomena within its boundaries."

Is preservation? The general public can see these historical sites by taking a chance of getting hit by a golf ball. The golfers will avoid them. When they do turn their attention to them, it will be because a ball has gone there, and their words of abuse will be inappropriate to ~~XXXXXX~~ a historic site worthy of preservation. They might cause its existence. They may dislodge some of the rocks, etc. in order to get their balls and continue their game. The historic sites will be disturbed. Hawaiian historic sites incorporated into a golf course is incongruous and sacrilegious.

Also, isn't there another battlefield besides Moku'ohai Battlefield?

13. Page 9, first paragraph under LAND OWNERSHIP:

"As the proposed site is owned by the Bishop Estate, the County has been negotiating for some time to acquire both the golf course site and the Palemano Point beach park area. The negotiations have thus far been favorable from the County's perspective."

Many people who have expressed support for the golf course and/or the Palemano park plans have done so without knowledge of:

- a. the large-scale development planned by Bishop Estate as ~~XXXXXX~~ outlined in the West Hawaii Tourist Impact Study.
- b. the size of the park - not one for the neighborhood to enjoy but for all of North and South Kona and inviting more immigration.
- c. residents in the area who will be forced out directly, or indirectly through increased taxes.

14. Page 10, par. 3 under THE ENVIRONMENTAL IMPACT OF THE PROPOSED ACTION:

"Some effect on the groundwater hydrology of the area may occur. Because of the limited information available on the groundwater system of the area, the extent of the possible effect is unknown.

The County has the responsibility of making the studies necessary to find out the probable results of the project.

15. Page 11, par. 3:

"This facility will be located more centrally to the distribution of population than other facilities."

What about other facilities? Is it centrally located if it is in Keel? See comments under #2.

16. Page 11, same paragraph (3):

"On the other hand, development of this facility will have some effect on the existing lifestyles of the area and thereby disrupt to some extent the lives of the residents of the nearest areas (Hapoopoo and ~~XXXXXX~~). Such an impact and/or disruption would occur however, even if the golf course did not go in but other proposed projects

such as the Palemano Point beach park, the Kealahou Bay State Historical Park, the development of the water system, and improvements to the roads, were to come about. Any of these projects would have the same, if not a greater, impact on the area as the golf course.

The residents in the area and in Kona have expressed their views on the prospect of the disruption of their lifestyles in their testimony before the Hawaii County Planning Commission on August 3, 1972. Greater weight should be given to these opinions than just a casual remark that "the development will have some effect on the existing lifestyles of the area"

Also, the statement quoted above: "Any of these projects would have the same, if not a greater, impact on the area as the golf course." is certainly open to question. All of the other projects named above will have effects depending on their nature and size. For example, the development of the water system - if it is of limited size, to serve the local population, is one thing, compared to a big water line that would encourage development in the area. Same with all the other developments listed above. But, the development of the golf course will bring the demand for all of these developments and on a large scale.

Also, the park plans are tied in with the golf course in the same agreement; therefore, we can not speak of them separately.

Also, what is the status of the proposed "scenic drive" around the golf course? We received a note ~~XXXXXXXX~~ from the Planning Dept. that it was suspended until further notice, or some thing like that. Please clarify. A lot of testimony was given against this "scenic drive."

17. Page 11, last paragraph:

See #12.

18. Page 12, par. 2: re groundwater hydrology:

See #14.

19. Page 12, par. 3:

"The planned recreational complex is expected to attract more persons into the area."

To live or to visit only?

"Additionally, there would be the potential for land costs to rise due to the development of amenities."

How will be or Bishop Estate would not be allowed to go through with it. They cannot give away land for nothing.

"If any real property taxes are concerned, a check with the Hilo office revealed that persons living around the Hilo Municipal Golf course are not directly affected by proximity to the golf course in the assessment of the value of their property."

Was the land around the Hilo H. golf course agricultural before the golf course went in?

The prices of the lots at Waialeale (Boise Cascade development in

COMMENTS ON THE LMS, KONA GOLF COURSE, LMSI, SOUTH KONA, page 6

Kohala) are said to be in direct relationship to their distance from the golf course - the closer to the golf course, the higher the price.

20. Page 12, under ALTERNATIVES TO THE PROPOSED ACTION: par. 2:

"One of the areas which has been considered is near the Honohepa Small Boat Harbor. This would place the golf course, on one hand, closer to the resort area of Kailua but, on the other hand, remove it further from the bulk of the population in the region....

See #2.

21. "The Honohepa-Kailua area is also a historical landmark on the National Register of Historic Places. Location of the golf course in this area could disrupt just as many sites of historical significance as at the proposed Kona site. The State may also have proposed plans for the use of their lands in this area. If private lands were to be involved, acquisition costs may be prohibitive."

- a. The State's proposed golf course is OUTSIDE the landmark area.
- b. There are state plans for a recreational complex in this area. See KEALAKEHE DEVELOPMENT PLAN, State DNR, 1968, page 74.
- c. There is no question of private lands - there is a lot of State land.

22. Page 12, last paragraph:

"It should be noted that even if the golf course were to be relocated but the proposed development of Palemano Point, the water system, the sewerage system and the improvements to the roads were to come about, similar demands and impact would occur in the area. This would also apply to land and social values in the area."

Would a sewerage system be put in without the golf course? Isn't it for the golf course and the subsequent development of the area?

23. Page 13, first two lines:

"The environmental and social impact expected to occur from the golf course project would be the same regardless of where the golf course were to be located."

There is no one living on the Kealakehe lands in question. No one would be moved out, or faced with rising taxes that would force him out.

Also, isn't this contradictory to the earlier statement that the Hilo Golf course did not raise the taxes of the surrounding lots?

24. Page 13, par. 2:

"The proposed golf course and recreational complex

Since these two facilities are being considered together, as they should be since they are two of the three parts of the agreement between Bishop State and the County, shouldn't this also be for both? Shouldn't the park plan be discussed in detail also, instead of only mentioned by name? What are the environmental effects of the park project? It does not seem fair to dismiss it casually as it is being done here. They are related; let's discuss them thoroughly and together.

Same paragraph:

"The greatest value of the proposed project is that a large area will be assured of being maintained as open space for public use."

In place of the vast area now in open space, we will be left with only 220 acres of open space.

Also, other recreational facilities could be developed to preserve the open space, if some recreational facility it must be, that would be used by more of the population than a golf course would, and at less cost.

25. Page 13, ECONOMIC AND SOCIAL ANALYSIS, par. 1:

"The proposed golf course project has been a controversial one. Various individuals and organizations have expressed the opinion that should the golf course be developed, then land in the South Kona area will almost immediately be developed, thereby destroying the existing life-styles of the area. It has also been contended that the course would be more for tourists than for residents. The objective of the project, however, is to provide additional recreation opportunities and facilities in the Kona area. It is expected that more persons will be able to participate in this suppressed sport if the facility were developed."

It was contended at the public hearing (of the Planning Commission, August 3, 1972, or thereabout) that the golf course would be more for the NEW RESIDENTS WHO WOULD BE MOVING INTO THE NEW DEVELOPMENT AROUND THE GOLF COURSE, an estimated 8,800 residents are projected in the WEST HAWAII TOURIST IMPACT PLAN, VOLUME II, pp. 108-109.

As for the statement that the objective of the project is to provide additional recreation opportunities, it is not enough to have an honorable objective, we must consider all the probable results and effects.

26. Page 15, ECONOMIC AND SOCIAL ANALYSIS, par. 3:

"Economically speaking, the estimated cost for developing the proposed course, practice range, and other facilities is between \$1.5 and \$1.8 million. The Palemano Point plan is estimated to cost in the neighborhood of \$5 million or more."

Is the figure for Palemano Point for the land purchase from Bishop?

Is it for the construction of the facilities also?

Is there any money already appropriated for this - or is it somewhere in the future?

Is it State and County funding or only County?

What is the projected date of its acquisition and construction?

27. Page 15, last paragraph:

"The golf is one County-sponsored activity for which there is a charge, and revenue, albeit small, is expected from the course. It should be noted, however, that one of the functions of government is to provide facilities on a non-profit basis. Operating costs for the Kila Kila Municipal Golf Course in fiscal year 1971 . . . (amounted to \$50,000. cost to the taxpayer)."

Sec #1 - again, it is a question of priorities. What recreational facilities are most urgently needed by what segment of the population? And at what cost?

In conclusion, we believe that the eis is incomplete and inadequate because:

1. there is no mention of the agreement between Bishop Estate and the County, which should bring up the question: Why is Bishop willing to donate 220 acres to the County for a golf course?
2. the Bishop Estate agreement states on page 10 that the County will get the parcels now privately owned ... that are needed for the Palemano Point park; therefore there is a question of people being forced out.
3. there is no mention of the WEST HAWAII TOURIST IMPACT PLAN, VOLUME II, which outlines the Bishop Estate's plans for the new community - a leisure community - in this area with an estimated population of 3,500 people. Since this development will begin with the golf course construction, we must discuss its impact along with the golf course. But this the County has not done. As a result, many people and groups who want Palemano Point park support the golf course because they were under the impression that both facilities will be limited in size so that they will be mainly for the use of the residents in the area. They know nothing of the development proposed for the area. They are not aware that the character of the area will be greatly changed by the influx of people.
4. there is not enough information on the County's standards for the various types of recreational facilities, therefore we do not know the priority of golf courses. What is the standard for golf courses? Are the standards for playgrounds, swimming pools, etc. that are used by a greater segment of the population being met?

Sincerely yours,

Alan Tyler

ALAN TYLER, PRESIDENT
KONA CONSERVATION GROUP

Hawaii

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Citizens Ignored On Keeki Proposal Say Ecologists

By FORNSTADT
HONOULULU—The County of Hawaii has been charged with "frustrating citizens objections" and failing to consider the impact of development caused by the proposed Keeki municipal golf course.

The ecology group life of the land today issued a blistering 17-point indictment of the County's environmental impact statement (EIS) on the controversial South Kona golf course.

"Basically, we see the golf course as a catalyst for development... the EIS does not adequately evaluate the impact of this development," according to the life of the land statement.

Both the County and the State have appropriated a total of \$1,700,000 thus far for the 150-acre course in rural Keeki. Bishop Estate has announced a general resort development plan for the area, in the vicinity of the golf course.

The County acquired the golf course land from Bishop for \$1 a year.

Several public hearings have drawn wide opposition to the County's planned golf course.

The environmental impact statement prepared by the County devotes "only two sentences" to this determined opposition, according to life of the land.

The statewide ecology group also said a golf course in South Kona would not solve the recreational problems of the island, which the EIS cites frequently.

There is also nothing in the EIS about the impact on South Kona of the "thousands of

people" who would be attracted to the area by such a golf course, according to this morning's statement.

There are four historical sites in the area, said Life of the Land but the EIS does not take them seriously.

Life of the Land's statement was prepared by researcher Robert Gould. It closely parallels a similar statement taken by the Kona Conservation Group.

After all comments are in, the state Office of Environmental Quality Control will make a recommendation on the project. Should that recommendation be negative, State funding could be halted.