

To: Kimo Alameda, Ph.D. - County of Hawai‘i Mayor
Jeffrey Darrow, Acting Head of the Planning Department
Keith Okamoto, Manager-Chief Engineer Department of Water Supply
Hans Santiago, Planning Department
James Hustace, District 9 County Council Representative

From: Momi Naughton, Ph.D. (808) [REDACTED] email: [REDACTED]

RE: ‘**Ōuli Farms**

I appreciate the opportunity to voice my concerns about the planned development of ‘Ōuli Farms in South Kohala. Although I belong to several local organizations, I am writing as a private citizen and homeowner in Waimea.

As a cultural anthropologist with expertise on the ancient and post-contact history of South Kohala, I have been asked in the past to consult with the county and state on various infrastructure projects in our area. I was therefore surprised and concerned with the lack of public information or input on the planned ‘Ōuli Farms development that, in my opinion, is marketing and misrepresenting itself as a “farming” community to qualify to build on lands zoned agricultural.

The ‘Ōuli Farms development highlights a wider concern which is what the proper land use is for parcels zoned agricultural. It would be valuable for future planning if the current administration would tackle this question. Issues around agricultural zoning have previously been brought up many times as seen, for example, in the controversial Kona Estates at ‘Opihiale (SFGATE March 23, 2023) where a resort was planned on agricultural land and the proper approvals were not in place prior to marketing to investors.

From what little I can glean with the limited description on the ‘Ōuli Farms website, the project will be a gated community on 840-acres of agricultural land consisting of 140 five-acre “farm” lots, “extensive recreational areas,” and multi-million-dollar homes. Although I have many concerns, the lack of water, lack of consideration for preserving ancient Hawaiian sites, lack of community engagement, and traffic congestion are the primary issues I’ll address here.

Ancient Hawaiian Sites and Traditional Practices: As there is an excellent study that addresses traditional land use already in existence: *He Wahi Mo ‘olelo no ‘Ōuli ma Kohala, Hawai‘i-A Collection of Traditions and Historical Accounts for ‘Ōuli Kohala, Island of Hawai‘i* by Kumu Pono Associates, there is no need to go into great detail on this topic here.

What does need to be emphasized here is that the proposed development area has traditionally been arid *pili* (grass) lands and the only farming done in this area was limited and along stream corridor and towards the upland portions of ‘Ōuli. Historically major flooding has occurred after heavy rains in *mauka* areas and the fierce *mumuku* winds have made living in the area a challenge. “He [Rev. Lorenzo Lyons] also noted that the livelihood of the people was based in fishing and making salt, the product of which they traded for vegetable goods with those living in the cooler uplands. (Kumu Pono pg. 20)”

Therefore, the idea that a farming community could successfully thrive in this area is, to me, an attempt to fit what is a resort-like high-end development into the parameters of what is allowed within agricultural zoning. Not only would water be an issue, but the lack of soil adequate for farming also needs to be addressed. No doubt the current agricultural designation of the property has to do with cattle grazing when the area was under Parker Ranch.

Has the 'Ōuli Farms proposal gone through the Planning Department's Cultural Resource Commission and what is the status of the Ka Pa'akai Analysis of the area? 'Ōuli is rich in ancient trails, archaeological sites, and a riparian corridor that shows ancient traditional practices.

Lack of Community Engagement: The previous county administration under Mayor Roth seems to have often neglected the commitment the county has shown in the past for community input with regards to development and infrastructure that will impact the people of Hawai'i Island. I am not sure if this lack of transparency violates any of the state's sunshine laws, but as I've asked members of our community if they are aware of the 'Ōuli Farms development, very few are. At the very least, the development has flown under the radar thereby limiting public knowledge and the ability of those of us in the Waimea community from registering our concerns.

Lack of Water: As was noted in a state study in 2023, the geological understanding our aquifers is problematic. "The hydrogeological framework of Hawai'i Island is not as well-known as that of other islands (Island of Hawai'i Hydrologic Units 8161, State of Hawai'i, December 2023)"

In 2022, the Commission on Water Resource Management received 2 million dollars to fund a Deep Monitor Well in Waimea to observe long-term changes in the thickness of our aquifer's freshwater lens. The project was targeted for completion in June 2024. Has data been collected and made public that can help us assess the water capacity for this and future developments?

The website for 'Ōuli Farms acknowledges that they are aware that water will be an issue with their development. Under "Letting Nature Take the Lead" it states:

- "Natural seasonal stream patterns and stream water will be captured and used to supplement ground water for farm and golf irrigation." [Is this legal?]
- "Homes will be required to conserve water."

Earlier posts on 'Ōuli Farms showed diagrams of the planned houses and showed "pool terraces" that included infinity pools adjacent to the large multi-million-dollar homes. Although not currently mentioned on the website, the above quote in the "Letting Nature Take the Lead" indicates that there will be a golf course. The "extensive recreational spaces" are not defined on their website or identified as to their water needs.

This planned 'Ōuli Farm golf course, by my count, will be the 15th golf course between 'Ōuli Farms and Kohanaiki along the South Kohala/North Kona Coast. Although about 10% of water used on golf courses may be recycled, they are known to be huge water users and, in fact, of the top 10 largest consumers of water on O'ahu, six are golf courses. There are about 30 different pesticides used on golf courses and run-off needs to also be considered. Perhaps a moratorium

on golf courses on this coast should be considered until an analysis of how much the existing ones are being utilized and the environmental impact of more courses.

Additionally, when Mark Benioff generously donated land in ‘Ōuli for low-income housing, it was noted that “The number of affordable units in the Ouli property will ultimately depend on how much water is available (Big Island Now Dec. 20, 2023).” This property is just *mauka* of the planned ‘Ōuli Farms development and coupled with the mentions of water issues on their website, indicates that they are already aware of the shortage of water.

Water for Hawaiian Homes Lands in Kawaihae: As you know, the top four priorities for public use of water in Hawai‘i includes reservations “of water for Hawaiian homes lands.” The Kawaihae Kailapa Hawaiian homes area, which is *makai* and north of the proposed ‘Ōuli Farms development, currently has to purchase their water from Kohala Ranches. It seems that water for Hawaiian homes should be prioritized before luxury development.

In the ‘Ōuli Farms permit application for “Stream Channel Alteration” it states:

We understand that the CWRM is evaluating instream flow of surface water from existing streams upstream of Keanui‘omano and Wai‘ulaula streams to address the needs for a consistent flow of water for cultural practice. Since this work is occurring *mauka* of Parcel 51, the applicant does not anticipate that the proposed improvement will have an impact on CWRM’s project.

The above quote, does not take into consideration Hawaiian homes lands and water needs *makai* of the proposed development. Traditionally, in such practices as *kalo* farming, it is the responsibility of the farmer who is upstream of others to allow, via *‘auwai*, those below to have sufficient water for their needs. Additionally, our Hawaiian Homes farmers and ranchers have long had water issues as have farmers in the Lālāmilo farm lots.

Traffic Congestion: In the late 1970s, I was on the board of what was then called the Waimea-Kawaihae Community Association, under Hisa Kimura as chair. At that time, and actually since the 1960s, there were plans in place for a bypass road. I was surprised when I returned to live in Waimea nearly 30 years later, that the bypass still had not been built.

The ‘Ōuli Farms development, which will connect to Kawaihae Road, will further exasperate the congestion as Waimea is the closest town for work, shopping, and for schools. Currently if there is a traffic accident, a fallen tree, a parade, or fire we are stuck in traffic for hours. More development without the infrastructure to support it, will increase the congestion. With the aridness of the ‘Ōuli area, if a fire were to break out, would this create another tragic situation as was seen in Lahaina?

Again, I appreciate your attention to my concerns.

Cc; Patricia Tummons (Environment Hawai‘i), Kamanamaikalani Beamer (UH Mānoa Richardson School of Law), Chuck Flaherty (Sierra Club of Hawai‘i), John Hill (Civil Beat)

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Tim Richards – Hawai‘i State Senator 4th District
David Tarnas – Hawai‘i State House of Representatives 8th District

From: Momi Naughton, Ph.D.

Date: February 3, 2025

RE: ‘**Ōuli Farms *Hana Hou***

In revisiting the ‘Ōuli Farms website this past Saturday (2/01/2025), I was struck by the interesting coincidence that only three days after I sent my letter of concern (1/28/2025) about the planned development of ‘Ōuli Farms, their website had been altered. The portions of the website that I had quoted in my previous letter have been either deleted or edited.

For example, I quoted the section under Letting Nature Take the Lead which previously said: “Natural seasonal stream patterns and stream water will be captured and used to supplement ground water for farm and golf [underline is mine] irrigation.” This section now reads: “Seasonal Water Capture: Exploring the option of capturing high surface flows from the streams for irrigation purposes.”

This change on the website indicates the active “stream water will be captured” has been replaced with the passive “exploring the option of capturing...” In addition, the only place where “golf” had been mentioned on the website has been deleted. Under Water and Resource Management the website currently states: “Irrigation: Utilizing non-potable water for farm and recreational uses [underline is mine].” It is unclear if “recreational uses” refers to pickleball courts or a golf course with the latter demanding considerably more water.

I do have screen shots of the prior ‘Ōuli Farms website posting.

Golf or no Golf Course? As I mentioned in my previous letter of 1/28/2025 and above, the ‘Ōuli Farms website is unclear as to whether a golf course will be part of the development.

However, according to a post on the international golf site GitHub about ‘Ōuli Farms it states: “Founders Joe Root and George Punoose have planned for the community to have a golf course integrated into the natural landscape. Punoose was previously at Cabot St. Lucia’s Point Hardy Golf Club which has a Top 100 in the World golf course designed by Bill Coore and Ben Crenshaw.” The above quote, the previous and now deleted mention of golf irrigation, and the fact that Joseph Root was the Director of Golf at the Mauna Kea Beach Hotel from 1994 to 1999, leads me to believe that a golf course is, indeed, part of the plan for ‘Ōuli Farms.

Another recent omission from what was previously on the website also has to do with water. Formerly the website stated: “Homes will be required to conserve water. A new potable water well will be used for crop irrigation.” Now there is no mention of homes conserving water

except where it now states “Homes will feature water-efficient systems” without actually identifying what those systems will be.

Also, in the previous description of the development it noted: “Ōuli Farms will invest in a potable well system, sewage treatment, utilities, and the necessary infrastructure to protect the community’s resources.” That statement has also been omitted from the current website. It appears that negotiations have now been made with Mauna Kea Resort for non-potable water and wastewater disposal. “Farm crop irrigation will utilize non-potable water, currently allocated from the Mauna Kea Resort. Future options for additional non-potable sources are also being explored. The community’s wastewater will be tied into the South Kohala Wastewater Facility, within the Mauna Kea Resort.”

As I am retired from the University of Hawai‘i and reside in Waimea, I would be available to meet with any interested parties to discuss my concerns about the ‘Ōuli Farms development. I do have more points, such as “workforce housing” that I would be pleased to expand on.

Please note that I neglected to include Senator Tim Richards and Representative David Tarnas in my first letter to you all so will be including them from now on and will send them the previous letter. Again, I appreciate your attention to my concerns.

Cc; Patricia Tummons (Environment Hawai‘i), Kamanamaikalani Beamer (UH Mānoa Richardson School of Law), Chuck Flaherty (Sierra Club of Hawai‘i), John Hill (Civil Beat)