



November 1, 2024

Windward Planning Commission
Leeward Planning Commission
Planning Department
COUNTY OF HAWAII
101 Pauahi Street, Suite 3
Hilo, HI 96720

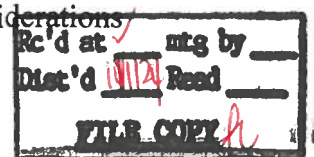
Dear Members of the Windward Planning Commission
And Leeward Planning Commission

**Subject: County of Hawai'i General Plan 2045 - Final Recommended Draft
dated July 2024
Kona Country Club, Inc.
Keauhou, North Kona, Hawai'i, TMK:7-8-010: 051, 077, and 082**

At one point in time, there were two (2) golf courses straddling Ali'i Drive in Keauhou, Kona owned and operated by Kona Country Club, Inc. Due to high operating costs, the *mauka* course, which is bounded on the *mauka* and north side by various residential developments, was closed over five (5) years ago. The land sits fallow today.

As such, at the onset of the County of Hawai'i General Plan ("GP") update process in 2015, on behalf of Kona Country Club, Inc, landowners of the subject parcels, I submitted a letter, dated September 24, 2015, requesting consideration that the subject properties be considered for Urban Expansion or Low Density uses instead of Open on the GP Land Use Pattern Allocation Guide (LUPAG) map. In summary, the reasons were:

1. Golf courses within the GP LUPAG "Resort Node" are not designated "Open". These include Kona Country Club's golf course on the *makai* side of Ali'i Drive, as well as the golf courses at Mauna Kea, Mauna Lani, Waikoloa, and Hualalai/Kukui'o. Most of the golf courses outside of the resort node (although this course is just outside of it) are designated similar to the adjoining properties. These include the Makani Country Club (formerly Big Island Country Club) – Rural; Makalei – Extensive Agriculture; Kukui'o - Low/Medium Density; Nanea – Low/Medium Density; and Hapuna Prince – Extensive Agriculture.
2. The redesignation would allow for alternative land uses, such as residential, which would be consistent with the surrounding land uses. Notwithstanding the LUPAG designation, through the rezoning process, infrastructure and other considerations such as archaeology, view plane, and the like will have to be addressed.



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This request was renewed in my letter of October 2, 2019, subsequent to my meeting with the staff of the Planning Department.

Inasmuch as the current draft was not accommodated, I reached out to the staff who informed me that one of the parcels (parcel 82) was already in the Low Density Urban but the remaining two parcels (parcels 51 and 77) are still being proposed "Recreation." The staff also noted that "Unfortunately, this was not reexamined or brought to our attention during the 2023 review" and apologized "for any inconvenience and misunderstanding."

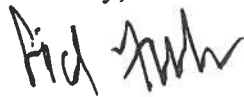
The staff also noted that it had received two (2) letters to the proposed subdivision of the golf course into a 14 large lot subdivision. One was from the 58-unit Apartment Owners of the Villas at Keauhou Estates and the other, from the 135 luxury lot Association of Property Owners of Keauhou Estates. In addition to raising land use processing questions, other objections related to the potential loss of their view plane and expectation of a perpetual golf course or open space.

It is maintained that the subject properties, by themselves, do not have significant public open space or recreational value. They are situated *mauka* of a public highway (Ali'i Drive) and do not have cultural or other environmental resources – such as a dryland forest – which by themselves would be worthy of preservation or acquisition under the Public Access, Open Space, and Natural Resources Preservation Commission. Further, no interest has been expressed by any governmental or open space/recreational non-profit entities to use this area for recreational or open space purposes.

Thus, a recreation designation would not only be unfair but deny the landowners of substantial property rights, especially when there is no clear public purpose. Further, during any land use entitlement process, the public will be allowed to weigh in as well as infrastructure and other considerations will have to be taken into account.

On behalf of the landowner, we respectfully request your favorable consideration in having these properties designated "Low Density", which would be consistent with the surrounding areas. Thank you very much!

Sincerely,



SIDNEY M. FUKU
Planning Consultant