



# *Kona Blue Water Farms*

Kona, Hawai`i

A Division of Black Pearls, Inc.

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June 13<sup>th</sup>, 2003  
KBWF/Fred Yeck 1b

Mr Fred Yeck  
75-670 Halewili Place  
Kailua-Kona, HI 96740

Aloha, Mr Yeck,

We are hereby responding to your letter of March 16<sup>th</sup> to the Land Division, concerning our application for an open ocean fish farm near Unualoha Point, off the Kona International Airport, in Kala'oa, Kona.

We will address each of your stated reasons for objecting to our proposal, in similar pointwise format :

1. "To allow exclusive use of an area of our open oceans is contrary to the traditions and practice..."

Exclusive ocean use is certainly part of Hawaiian traditions. In pre-contact Hawaiian culture, traditional marine tenure reserved areas of ocean or reef, or specific 'konohiki' fisheries for exclusive use of individuals, families or clans. Ali'i often reserved entire species, such as moi, for their own use. The konohiki fisheries even persisted into the 20<sup>th</sup> Century.

This is not "a dangerous precedent", but a carefully considered step by the State legislature to open up the potential for open ocean aquaculture. In the drafting of the legislation for HRS 190D, the wording was kept deliberately flexible, to allow for exclusive use where the Board considered it appropriate.

Nevertheless, we have made several changes to our proposed farm layout and management plan. One of these changes involves now making all six cages of the submersible spar buoy kind. We believe that this will allow us to now withdraw our request for exclusive use of the central area surrounding the cages. We can only do this so long as fishermen and divers respect the cages, and keep well clear of them. We may need to reconsider the level of exclusivity if we encounter problems of pilfering, vandalism, or reckless endangerment of property, health or safety. In such a situation, we would need to go back to the Land Board for redefinition of our lease exclusivity status.

Because of safety and liability issues, we would still request no anchoring, no SCUBA-diving and slow low-wake speed by boats within the proposed lease area.

2. “If fish farms are to have exclusive use of areas of our ocean up to 80 acres, why not fishermen?”

This is indeed a good question, Mr Yeck. Whilst we are now no longer asking for exclusive use of our central 9 acre area around the cages, I still see there may be some need for this in the future. I envisage that fishermen might be allowed to develop some areas where they are given exclusive use of the ocean, in exchange for some rental payment, so long as it doesn't unduly interfere with fishing traditions or established practices. I would encourage you to think of ways that you could use these opportunities to develop more sustainable means of harvesting or culturing fishery resources.

We also hope that fish farming will lead to more gainful, stable employment for former fishermen. There are virtually no full-time commercial bottom-fishermen left in Kona any more – only part-time or retired folk. Since first airing our proposal, we have had several bottom-fishermen approach us and ask if there is a possibility for them getting jobs on the fish farm. At the moment, these fishermen have been forced to take other full-time jobs to support their families. We hope that some of these Kona fishermen will get a chance to get back to work on the ocean.

3. “... significant risk of damaging the environment ... well documented that there is a significant risk of disease being transferred to wild ...”

One of the beauties of this innovation to start fish farming in the open ocean is that the strong currents dissipate any suspended solids or dissolved nutrients in the effluent. There will be an extensive environmental monitoring program that will track water quality around the farm, and will monitor the abundance of corals and fish on the adjacent reef, to ensure that there is no long term detriment.

We will only be farming native Hawaiian species, so the disease risks are minimal. The main species that we will farm - kahala – is currently considered a trash fish by Kona fishermen. They do not eat kahala because of the parasitic worms and the risk of ciguatera. Farming allows us to avoid these risks.

4. “...in Alaska .... fish farms have been destructive to the economies of existing commercial fishermen and fish processors.”

Certainly, fish farms do offer a more sustainable, economically viable industry than wild stock fishing. This is part of the attraction to processors, wholesalers, restaurateurs and consumers. The prohibition against fish farms in Alaska has not helped Alaskan fishermen – the farms have just developed instead in Norway, British Columbia and Chile. In most situations, commercial fishing is not sustainable in the long run. We have to give back something ... we can't just keep taking. The Alaska salmon fishery also depends on aquaculture (salmon hatcheries) to sustain its “wild” stocks.

Hawaii also likes to tout itself as being receptive to new, innovative ideas. Our state is desperately trying to attract new industries for economic diversification. Is it going to help Hawaii in these efforts if we prohibit a new, environmentally friendly form of aquaculture? Or will we just be left in the dust, like the Alaskan fishermen?

5. You further object to “the fact that the information relating to this application is only available in Honolulu”. This is not the case. We have made every possible attempt at outreach, and engaging the public in discussions on our proposed project. We have been holding public meetings and discussions with local conservation, shoreline, community and kupuna groups for over two years, now. We have had our draft Environmental Assessment posted on our web site ([www.blackpearlsinc.com](http://www.blackpearlsinc.com)) for over six months. You will also find there transcripts of the various public meetings, and excerpts of other background information. We believe that the more educated that people are on this issue, the more they are able to make a rational, informed decision, rather than a judgment based on hearsay evidence or misrepresentations about salmon farms or other aquaculture operations in other parts of the world.

I have been told by the Land Division officer that the official copies of the draft Environmental Assessment were delivered to both Kona and Hilo public libraries, as mandated by law. We were only notified of the “official acceptance” of our draft EA (the point at which it becomes available for public review) by letter dated March 3<sup>rd</sup>, so the copies were probably still in the mail to the library when you wrote your letter on March 16<sup>th</sup>. In any case, please contact us directly if you need more information on our proposal, and we would be happy to provide it for you.

Thank you again for your comments. I hope that this letter, and the proposed changes we have made to our project, help to persuade you that our project is worthy of support, or at least should be allowed to proceed.

Aloha, sincerely,

Neil Anthony Sims  
Vice-President / Research Director

c.c. Lands Division, DLNR, 1151 Punchbowl St, Rm 220, Honolulu HI 96809