

## **BF Committee**

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**From:** John & Janet Crews <jjcrews@me.com>  
**Sent:** Monday, March 27, 2017 6:12 PM  
**To:** BF Committee  
**Subject:** Cora Fees, and Concession Bids  
**Attachments:** CORA and Concessions.pdf

Dear Committee Member,  
Please take a moment to read and consider the attached letter.

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# CORA FEES AND CONCESSION BIDS

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March 26, 2017

To Whom it May Concern,

In this letter I would like to address two proposed changes to uses of our County Parks; dramatically increased CORA fees (BF-1 Appendix B CORA fees), and Concessions up for bid (BF-129).

I recently learned that the county is considering raising CORA fees by amounts that would raise the permit fees for many operators by 250% up to well over 400%. For some businesses, this can add up to many thousands of dollars. We feel that these proposed increases are unreasonable for multiple reasons.

1. Most of the CORA operators are small family businesses who cannot afford these types of increases; no small business can reasonably absorb 400%+ cost increases. Imagine the impact of increasing small business taxes by 400% and how devastating that would be. The fact that this CORA fee "tax increase" only impacts a small group of businesses does not make it any more reasonable.
2. The nature of ocean sports such as diving and windsurfing require that schools have access to more than one permitted location, so that locals and visitors alike will have access to instruction at an appropriate and safe location as ocean, wind, and weather conditions change. Ocean conditions do not allow use of some CORA locations on a regular enough basis to support high permit fees, despite the importance of having permit access to these locations when conditions are not appropriate or safe at other primary locations. High permit fees of these lesser used areas may either lead to abandoning their use all together necessitating canceling lessons for locals and visitors alike, or to operators paying the higher fees and then attempting to utilize these areas more often when they may not be safe or appropriate in an effort to recoup the high permit costs.
3. Any attempts to survive the impact of extreme fee increases must require attempting to pass part of these high cost increases on to park users who rely on CORA operators to supply safe activities with well trained and experienced staff and instructors. We feel that it is the County's role and responsibility to operate the parks for the benefit of residents and visitors, not to try to use them as a cash cow at the expense of park users. If high CORA fees force the legal operators to raise their prices substantially, to the point of being unaffordable, this would force more local families and visitors alike to either attempt these activities on their own without safe instruction, or to go to the illegal non-permitted schools who do not pay permit fees nor necessarily meet the many safety and training requirements required by the permitting process.

4. Up until now, the County has done a notably poor job of enforcing the requirement that those operating commercial operations in the parks have CORA permits. Those that adhere to the rules are put at a huge cost disadvantage compared to those that operate without permits. To raise the permit fees as unreasonably high as mentioned above would put those who play by the rules at an even larger disadvantage, and make it virtually impossible to compete price-wise with the non-permitted operations. Huge raises of CORA fees may appear to be a low hanging fruit for government funding since the family businesses that it impacts may not have the political clout to put up a significant defense, but it is then incumbent upon government representatives to look closely at the fairness of funding sources before imposing them.

The second item that concerns me are statements from County personal that the CORA permit system may be replaced by a "bid for concession" system. The idea of allowing new permitted concessions in some parks by offering services such as food or simple beach supplies such as towels, hats, sunglasses, and sun tan lotions makes sense in that it provides currently unavailable services and encourages entrepreneurship. My concern and fear is that this bid system may at some point be applied to existing CORA permitted activities. Some of the current CORA family operators have been supplying services in our County Parks for 30 years or more, an entire generations life work. Over these many years these family businesses have in turn hired many local employees, and have incurred extensive costs in equipment, training, and business locations. If the right to continue to conduct these CORA businesses is put up for bid, are these long established businesses going to be able to compete against the highest bidder from Oahu or California for the right to survive? What happens to a lifetimes investment in business goodwill and equipment? Does the County have the right to take long established local businesses and put their right to stay in business up for auction to the highest bidder? I cannot imagine a more obscene abuse of government power. A business that has survived for decades on hard work and providing a quality product should not have its very existence put up for bid by a government agency; I cannot imagine anything more unfair and un-American. I understand the concept of using a bid system to bring new entrepreneurial businesses to our county parks, but it would be a crime to extend this bid system to existing permitted businesses that have a lifetime of work as well as much of their life savings tied up in operating businesses that have survived due to years of dedication to honest work and quality service.

We ask that you take a firm stand against this soulless abuse of government power that could destroy long standing family businesses in the name of an increased revenue

source. Thank you for considering not just the dollar side of this equation, but also the emotional impact on local families of having a lifetime's work put up for bid by an uncaring government agency.

Sincerely yours,

*John and Janet Crews*