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From: [redacted]
Sent: Tuesday, August 20, 2019 12:30 PM
To: Surprenant, April; Morrison, Bethany; General Plan
Subject: My comments on the Natural Resources section of the GP 2014 August draft

Congratulations on outlining some long-needed, concrete steps to protect native species and wildlife. Although I agree with the spirit of almost every policy and action, I would like to suggest some additional thinking and maybe some changes to make them fair and feasible. I hope you will consider the perspective of someone who has worked in hundreds of locations around the Big Island on both development and conservation projects. My comments are in blue font, below.

PROTECTING NATIVE HABITATS & WILDLIFE

SUSTAINABILITY OBJECTIVE

Increase native habitat restoration on County owned or managed land.
GREAT

POLICY

1. Priority habitat restoration sites shall be identified as those disturbed areas whose restoration will result in the greatest habitat benefit.
Also GREAT…but it is a big task that requires expertise in habitats. And once the priorities are established, we all need to recognize that there are other factors that need to be seriously weighed: practicality and cost of restoration, and more importantly, maintenance. Cost of land acquisition or conservation easements. Interaction with other key County priorities (e.g., needed roadways, utilities, etc.).
2. Maintain a program for acquiring and maintaining native habitat to implement the recommendations in the Hawai'i State Wildlife Action Plan (SWAP).
[Rationale: Based on identified gaps in implementing recommendations from the DLNR SWAP of 2015.]
GREAT
3. As part of any permit application to the County Planning Department, the following natural and cultural resources shall be considered sensitive and therefore shall be inventoried with identified mitigation measures:
a) Critical habitat areas as identified by the U.S. Fish & Wildlife or County General Plan;
I am confused. The new GP defines critical habitat strictly in accordance with its use in the Endangered Species Act, by the U.S. Fish and Wildlife Service. Will the County General Plan define *other* critical habitat? Or is that just redundant?
b) Predominantly native ecosystems, which may not be considered endangered but are valued because of their nearly pristine condition;
Who will make this value judgement? Will it be consistent?
c) Anchialine ponds;
d) High-level groundwater recharge areas;
What is the meaning of this undefined term? Is that all groundwater areas mauka of the UIC line? Or mauka of a certain elevation? Much more precision is needed, because this would probably deem sensitive 90% of the Island of Hawaii. The remainder – the coastal region – is probably sensitive for other reasons. In truth, all aquifers should be protected by standard BMPs related to primarily to proper use and disposal of fertilizers, pesticides, fuel, and other chemicals.

e) Historic trails; and
f) Archaeological and historic sites subject to protection under HRS Chapter 6E
Is protection equivalent to preservation? Or inventory? This is a critical distinction that must be clarified.
[Rationale: Based on identified gaps in identification and mitigation for sensitive areas. See also Kona CDP ENV 1.5]
4. Development shall not disturb the following:
a) Anchialine pools;
b) Freshwater wetlands;
This works great in California, even Tennessee, but in Hawaii it is impractical. There are a number of definitions of wetlands used by various agencies, with those of the U.S. Fish and Wildlife Service and the U.S. Army Corps of Engineers being most common. It is likely that half a million acres on the Big Island (most muddy forests with hydric soils), and much of Hilo, meets a strict interpretation of the USACE definition. There would be more with the USFWS definition. Determining whether a given site has wetlands, and especially determining the boundaries of the wetlands, requires highly trained specialists and can cost thousands or even many tens of thousand of dollars. Even in federal projects, the USACE does not protect all freshwater wetlands – rather, they look at wetlands that are jurisdictional under the Clean Water Act, a much smaller subset that excludes isolated wetlands. Please understand the "swamp" you are wading into if you require this. Also understand that because of our unique environment, wetlands may not necessarily deserve more protection than their complement on the landscape: uplands. On one project I was involved in, the USACE obliged the FHWA to destroy a pristine `ohi`a forest with native birds rather than a 100% California grass wetlands that had been created by someone bulldozing a road across the slope. It would be good to avoid such outcomes.
c) Shoreline setback area;
d) Plant species listed by the US Fish and Wildlife Service as threatened and endangered
e) Exceptional trees;
[Rationale: Based on identified gaps in protecting natural resources from development impacts.]
5. Hawai'i County shall discourage developments and limit clearing of vegetation within Habitat Overlays.
If your Habitat Overlays are intended to be large or vague, you might want to refine the wording above. If you can get a win-win situation through clustering and habitat improvement, you might actually want to encourage development there.
[Rationale: Based on identified gaps in protecting natural resources and native habitats. See also General Plan Policies 8.3 (a, j).]
6. Establish Habitat Overlay Districts for:
a) Natural areas including old and new growth upland native vegetated areas with minimal existing development and/or infrastructure.
b) Vacant land which can be restored to connect upland native habitat patches and reduce further fragmentation of upland native habitat.
Could be good….but….fragmentation of habitat in Hawaii is a complicated concept. You might think you are doing God's work by connecting two patches of native forest, but there might not necessarily be any benefit whatsoever. I would hope that any decisions would be made in light of the assessments of professional biologists, not, speaking quite frankly, planners just looking at a GIS.
c) Lands required to provide an undeveloped buffer between natural areas and development to reduce secondary impacts; roadways, depending on size may form a boundary that removes the need for the buffer or reduces its depth.
SAME COMMENT AS ABOVE.
d) Lands designated for acquisition by public agencies for conservation and natural resource protection.
What does it take to be "designated"? Funding and approvals in place? A vague plan in the future? A suggestion by a member of the public in a comment letter?
e) Known or potential locations of threatened and endangered species and species of greatest conservation need.

f) Lands designated as conservation on the SLU, Future Land Use maps or Zoning maps or within a buffer/restoration area as appropriate.
Is the Planning Department going to try to take over the regulatory functions of DLNR for the permitting of identified uses in the Conservation District per Title 13, Chapter 5 HAR?
g) Identified wetlands
[Rationale: Based on identified gaps in protecting natural resources and native habitats. See the General Plan 8.2 Goals and Policies 8.3 (a-x.)]
7. Hawai'i County shall require clustering of any developments within Habitat Overlay Districts to avoid sensitive areas.
Sounds good. A great rationale for PUDs.
[Rationale: Based on identified gaps in protecting natural resources and native habitats from development. See also Hāmākua CDP Policy 8.]
8. Maintain and restore native habitat including marine, wetland, shoreline, and native upland systems on County owned or managed lands.
[Rationale: Based on identified gaps in protecting natural resources and native habitats]
9. Manage land uses to protect nesting areas and any bird species federally or state listed as endangered, threatened, or a species of special concern.
Is that nesting areas OF any bird species…..or nesting areas….AND any bird species (as written). If the former, you are protecting myna bird nesting trees, cattle egret nesting trees, etc. Those are not worthy conservation goals.
[Rationale: Based on guidance from SWAP 2015.]
10. Assess and prioritize County-owned areas for restoration in consultation with State, Federal, and private entities.
Very important.
[Rationale: Based on identified gaps in restoring natural resources and native habitats]
11. Protect and provide for restoration of significant natural and cultural features and ecologically sensitive lands, including but not limited to mountain areas, shoreline and coastal communities/areas, wetlands, fishponds, forests, natural gulches, riparian areas, streams and drainage ways.
12. Partner with the Big Island Invasive Species Committee (BIISC) and the University Hawai'i to develop a program for identification and protection of plant species of special status. Include plants designated as threatened and endangered by the US Fish and Wildlife Service and plants significant for cultural practitioners.
13. Partner with State and Federal agencies to support seedbanks of native and endemic plant species, especially species that are threatened or endangered.
14. Partner with the State Land Use Commission to establish a conservation buffer to accommodate shifting native habitats impacted by climate change, particularly wetlands and high-elevation forests.
Good.
[Rationale: University of Hawai'i at Mānoa Sea Grant College Program. June 2014 Climate Change Impacts in Hawai'i - A summary of climate change and its impacts to Hawai'i's ecosystems and communities.]
15. Incentivize the planting of threatened and endangered endemic plants species within their native ranges and during development activities.
GREAT
16. Incentivize the removal of invasive species during development activities.
GREAT
17. Partner with State, Federal, and private entities to support programs designed to avoid the introduction and establishment of invasive species and the control and eradication of invasive species; particularly that serve as disease vectors.
18. Partner with State, Federal, and private entities to support protection of native wildlife

and habitat.
19. Support the implementation of a Habitat Conservation Plan (HCP) for Protected Species on Hawai'i Island.
Would like a little more info on that. If you have ever had to prepare an HCP, you would understand that it takes years, sometimes millions of dollars, and people generally welcome it as much as a root canal. You go through it because you need to – your project involves some take or potential take of T&E species or adverse modification of critical habitat. There are other ways than HCPs to preserve habitat.

ACTION

1.1 Coordinate a program to actively control invasive wildlife on County-owned property, particularly invasive species that serve as disease vectors.
1.2 Coordinate a program to remove invasive vegetation from County-owned or managed lands.
1.3 Partner with State and Federal agencies to implement the State of Hawai'i Aquatic Invasive Species (AIS) Management Plan, and coordinate with the Hawai'i Invasive Species Council, the Coordinating Group on Alien Pest Species (CGAPS) and the Big Island Invasive Species Committee to eradicate invasive species on County-owned or managed lands.
1.4 Create a County nursery to maintain a stock of native species to be used in County landscaping.

SUSTAINABILITY OBJECTIVE

Increase percentage of forest and woodland cover.

POLICY

20. Prioritize urban tree inventories for primary urban areas such as Downtown Hilo, Waimea, and Kailua-Kona.
[Rationale: Based on U.S. Forest Service Urban Tree Canopy (UTC) Assessment, the U.S. Climate Resilience Toolkit, and City and County of Honolulu Urban Reforestation Master Plan 2006.]
21. Include reforestation elements in Community Development Plans, Special Area Plans, and community conservation projects.
[Rationale: Based on recommendations from the U.S. Climate Resilience Toolkit and the City and County of Honolulu Urban Reforestation Master Plan 2006. See also General Plan Policy 8.3 (x)]
22. Explore the feasibility of adopting a No Net Loss of Forest policy.
CAREFUL. Albizia, bingabing, gunpowder trees and African tulips make up a lot of forest area.
23. Encourage the planting of native trees, shrubs, and grasses in appropriate areas to increase forest buffer functions, forest diversity, and to reduce storm water runoff.
24. Continue to promote and support programs for community reforestation.

ACTION

1.5 Invest in public grounds by tree planting, buffer conservation, and habitat restoration.
1.6 Conduct and maintain an urban forest inventory of all trees on County lands.
1.7 Establish a street tree planting program to include:
a) street tree planting typologies scaled with street typologies
b) design guidelines
c) maintenance plan
1.8 Prepare Forest Health Assessments and implement Forest Management Plans for large County-owned forested properties.
GOOD
1.9 Develop & adopt a comprehensive and integrated Landscape and Tree Ordinance in the Hawai'i County Code and Ensure Consistency with Other Codes (Zoning & Subdivision, Roads, etc.)
Don't forget about the issue of harmful invasive trees.