

Mori, Ashley

From: Morrison, Bethany
Sent: Monday, September 30, 2019 10:07 AM
To: General Plan
Subject: FW: KCDP and GOAs
Attachments: 2040 draft GP comments from NP on UEA.docx

Ashley, Please intake.

Thank you,
Bethany

From: [REDACTED]
Sent: Monday, September 30, 2019 10:03 AM
To: Morrison, Bethany <Bethany.Morrison@hawaiicounty.gov>
Subject: Re: KCDP and GOAs

2019 OCT 1 AM 9 18
PLANNING DEPARTMENT
COUNTY OF HAWAII

Hi Bethany,

I'm not in the office now, but I'll confirm with you the 15th after I can check the calendar. That would be great!

And, I also would like to invite you or anyone to use my condo to spend the night if it is helpful.

I am attaching my 'testimony' regarding why I feel we need to stick with the GP's UE classification.

I have other comments on other GP topics, but will address those in a separate document.

At the meeting on Saturday i wanted to provide support for the proposal to limit the number of dwelling units on Ag lands. This has been an ongoing topic of interest (or torture) of mine for 25 years.....

Aloha and Mahalo,

[REDACTED]

9/30/2019

Comments related to the draft 2040 General Plan

To: Long Range Division,
Department of Planning



UE: Why map where to grow?

“Urban Expansion Area: Allows for a mix of high density, medium density, low density, industrial, industrial-commercial and/or open designations in areas where new settlements may be desirable, but where the specific settlement pattern and mix of uses have not yet been determined.” 2005 GP

The 2005 General Plan LUPAG maps include Urban Expansion Areas intended to designate where future growth should be directed. Just as important, the UEA boundary also serves to determine where development should be discouraged. In other words, the County will be very unlikely to approve urban development proposals that fall outside of the UE boundary or a Resort node boundary. The need to discourage ‘sprawl’ is well recognized. Many studies have proved that it is economically unsustainable for local governments to provide infrastructure to sprawling development patterns. Therefore any funding requests for increased services and infrastructure will be prioritized for land within the UE boundary. The increased emphasis on this planning principle in the 2005 General Plan makes it very unlikely that projects like Hokulia would get political support in the future. At the time this, in itself, was a huge achievement as compared to historic land use permitting practices in this County! In addition, public opinion has consistently stressed the need to keep rural Kona rural.

KCDP

In Kona, the UEA is delineated by a boundary line. All undeveloped or unentitled land within the UEA is identified as UE. But it does not deal with *how* growth should happen *within* those areas, nor does it address the *type* of growth that should occur or *what kinds of public infrastructure* will be needed. Specific locations and types of future growth are primarily the responsibility of the KCDP. Therefore the designation of land as the UE is primarily a neutral designation that merely serves to identify undeveloped lands located within the UE boundary as compared with undeveloped lands outside of the UE boundary. . It could be considered to be Kona’s “city limits”.

The primary problem with the draft 2040 GP concept of eliminating the UE land designation and replacing it with Low, Medium or High density urban designation is that those designations are NOT neutral! The authors of that proposed amendment are making a decision of what kind and where growth should occur within Kona’s UE boundary. And it is inconsistent with policy adopted within the KCDP. This can have many negative unintended consequences.

But it has been often pointed out that Kona's UE boundary includes a large amount of land and this can present challenges related to a form of unsustainable "urban sprawl". The primary downside of this is the resulting difficulty in providing sufficient interconnected urban services and infrastructure. So, the KCDP drafting process made it an important goal to address this challenge as an opportunity.

Where should we grow? Growth Opportunity Areas

"The genesis of the growth opportunity areas is in the Stakeholders Workshop held in the KCDP drafting process. As part of the workshop, participants were asked to consider where best to allocate future growth. From that exercise emerged a strong consensus among twenty different tables regarding preferred locations for future growth. ESC digitized the input from each tables and the overlap of all maps disclosed an initial set of preferred growth locations. These were later called Growth Opportunity Areas (GOA). During the public meeting of the first charrette participants discussed four different future growth scenarios: A. as zoned, B. as practiced, C. with a 5du/acre residential density, and D. with an 8du/acre residential density. The public's preferences were toward the higher density scenarios, somewhere between scenarios C and D. As a result the size of the land required to allocate future growth declined dramatically. In the first charrette open house we asked participants to fine tune the proposed locations based on their knowledge of the terrain, information about existing and proposed roads, environmental constraints, and proximity to existing settlements. The position of the GOA was further fine-tuned as a result of the open house.

Finally, in preparation for the second charrette, we mapped the areas, which up to then had been diagrammatically represented as circles. In doing so we kept everything within 1/4 mile of existing roads wherever possible, avoided protected areas and steep slopes.

The new alignments were presented again to the participants of the first public meeting of the second charrette for final refinements. The public expanded some of them, combined others and identified open spaces and open space mauka-makai connections through or around them. As a result of the charrette, ESC generated a development suitability analysis to determine a rough approximation of how much land could actually be developed within those areas. The analysis was based on the following factors:

- *Slopes less than 12%*
- *Not in a flood zone.*
- *Land not already developed*
- *Land not already approved for development*
- *Land that is not Important Agricultural lands*
- *Not overlapping the habitat of a rare or endangered species with global rank of 3.*
- *Seventy-nine percent of land within the GOA is buildable land, providing a supply of land that is twice as large as needed to accommodate projected growth. The excess is important because we cannot predict when the land within the GOA becomes available on the market.*

*GOA should be considered areas where incentives can be created to facilitate development in those locations. Incentives to develop land within the GOA's could include expediting the permitting process, providing infrastructure using the County's bonding capacity for water supply, wastewater, district wide drainage, and roads. A parallel set of disincentives could be developed for land outside the GOA's by promoting the retention of open spaces and working lands, by adopting tools to compensate landowners, such as TDR, or by County acquiring land inside the expansion areas for open space protection." *ESC*

How should we grow? Transit Oriented Development, TOD (or Traditional neighborhood Development, TND)

But the Kona CDP took this concept further than merely directing new development with this GOA's. The Kona community also wanted to address what "form" urban development would take within these areas. Instead of assuming a GOA might be filled with hundreds of single family residences, for example, the Kona CDP adopted the concept of encouraging the development of "mixed use villages" with the GOAs. These Villages would provide a mix of housing opportunities as well as retail and employment opportunities. The GOA should be zoned for higher densities and mixed uses (including residential mixed uses), and should ensure that density is created within quality urban design features. This form of urban development is also intended to reduce the dependency upon the automobile.

This form of "livable community development" is replacing or supplementing single-use zoning in many places around the country. So, this is how the Kona CDP transitioned from merely identifying GOAs to the adoption of Smart Code Village Design Guidelines. We need to make more of an effort to plan for the creation of quality urban environments on the Island of Hawaii.

UE lands outside to GOAs

So, what about land within the UE Boundary, but outside of the GOAs or TODs? The UEA designation doesn't intend to send a message that "anything goes" in those areas. Within the Planning Department, Long Range and Regulatory Divisions need to work more closely together to review each proposal. What can the proposal provide to Kona's long range urban development? Will it provide affordable or workforce housing for our residents? Will it contribute to a well-planned multi-modal transportation grid? How will it get water? How will it connect to a sewer system? Will it provide for urban open space and recreation needs for the community? If the proposal is outside of a GOA or TOD *and it can't pass a "concurrency test"*, then the proposal should be given a negative recommendation. On the other hand, we should maintain flexibility so that if a land development proposal comes in that is not currently mapped in the KCDP as a GOA or TOD, but the proposal can meet the concurrency standards, is designed as a mixed use Village that can meet the diversity of standards needed to fulfill the intent of the TOD Village Guidelines, and has access to major transportation infrastructure, then this proposal could be considered.

Thank you for this opportunity to provide comments.