



PLANNING DEPARTMENT
COUNTY OF HAWAII

2019 OCT 28 PM 3 16

October 21, 2019

Planning Director Michael Yee
County of Hawaii Planning Department
Aupuni Center, 101 Pauahi Street, Suite 3
Hilo, HI 96720

Re: Comments on General Plan 2040

Dear Planning Director Yee,

Yamanaka Enterprises Inc. was able to meet with Bethany Morrison and LeAna Gloor on October 3, 2019 and wanted to follow up in this letter on comments and ideas discussed in regard to the General Plan 2040. We are very grateful for the feedback and clarification on the process. The following are the comments we have on the plan:

1. Page 181 is the Future Land Use Map for the South Hilo district. The map has the Hilo Iron Works (TMK's: 3-2-2-001-8, 17, 8, 19, 24, 30 & 34) property listed as Medium Density Residential. Our current use for the property is a commercial and light industrial use with the improvements being in line with that use. We are also currently in the process of re-zoning the property to a Industrial-Commercial Mixed District (MCX) zoning which would put us in line with our current use of the property.

We discussed in the meeting that the definitions for Future Land Use Map Categories would be expanded upon to add more flexibility in the categories. We are in full support of these types of changes and would request that the Hilo Iron Works property would be labeled in a category that is in line with its current use and would allow for our rezoning to be possible.

2. Page 181 is the Future Land Use Map for the South Hilo district. In our discussion it was brought to our attention that Land use changes were not made due to a lack of a CDP plan for the Hilo area. We wanted to reiterate our hope for Hilo that more flexibility in the Land Use Map can be provided to areas that have the most infrastructure in place for development. Most notably were areas such as Waiakea House Lots and the Wainaku area that are labeled as Medium Density Urban. These areas have important infrastructure such as sewer and water lines that allow for a higher density. We would request that these areas are changed to a High Density designation or to a yet to be revised designation that allows greater flexibility.

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3. We have overall concerns with the Draft General Plan 2040 that includes but is not limited the to the following:

- The Draft is too specific and recommends changes not in alignment with the various Community Development Plans (CDPs)
- The Draft directs the County government to overreach its regulatory responsibilities and regulates resources and areas under the State jurisdiction, including management of nearshore water and environmental quality, and other matters currently regulated through the State's Conservation District Use Permit process.
- The Draft calls for a significant growth in government, which will be costly to implement
- The Draft directs the County to increase efforts to gain public access to cultural and natural sites on private lands through increasing requirements for public access easements during land use approvals and through more County investments in direct land acquisition. Without managing the public access properly to protect theses cultural and natural sites, the increase in public access to theses sites will likely result in the degradation of these important resources.

Mahalo for the opportunity provide feedback and we look forward to the continued process. Our hope is that this process is not rushed as it is a very important document that can have far reaching impacts that need to be thoroughly considered.

Sincerely,

A handwritten signature in black ink, appearing to read "Gast" followed by a stylized flourish.