

Mori, Ashley

From: [REDACTED]
Sent: Monday, October 28, 2019 10:00 AM
To: General Plan
Cc: Yee, Michael
Subject: Comments on Draft 2040 GP
Attachments: Comments of draft 2040 GP KM 10282019.pdf

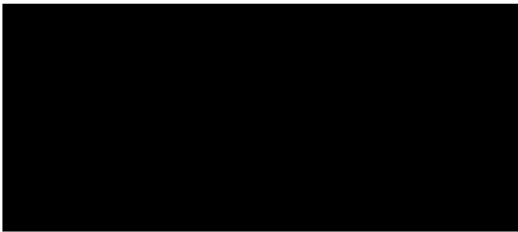
Good morning April, Bethany and Kamu,

As promised, here are my written comments on the draft GP. I look forward to continued participation in upcoming/ongoing review. Aloha,



2019 OCT 29 AM 8 24
PLANNING DEPARTMENT
COUNTY OF HAWAII

128776



October 25, 2019

To: Planning Dept., Long Range Planning Division

Subject: Comments on Draft General Plan 2040

Thank you for this opportunity to provide comments on the Draft GP. I have participated in a couple speak outs and focus topic work sessions and wish to summarize the comments provided there.

The GP is the policy document to provide the Vision of our future, the desired outcome, and the GP should seek to ENABLE that outcome not create obstacles to its realization or to grow the size and policy reach of government. I believe as drafted the GP provides a fuzzy picture of the desired future and a convoluted overreach of a scattered mix of policy, standards and regulations with too many sticks and not enough carrots. I perceive that this will actually hold back implementation of the desired outcomes and lead to growth following a path of least resistance onto Agricultural lands, which is counterproductive to the goals. A major re-write is necessary and careful consideration warranted.

Please evaluate each and every use of the words "shall", "require" and "ensure". They create significant obligations and financial commitments by the County that I do not believe are realistically attainable or sustainable. A prime example is in Policy 578 wherein is the proposal to limit growth within the SMA. In Kona and Kohala, that SMA line is at Queen K and Kuakini, below which major infrastructure exists and growth has been directed by the Kona CDP.

The concept of Rural should be more fully defined and then encouraged, since outside a couple of the island's more urban areas like Kailua and Hilo, the inherent character of the Island of Hawaii is Rural. Methodologies for enhancing and reinforcing that Rural character should be incorporated to reinforce our existing Villages and small towns. I do not think Rural is "concentric" around Urban centers, but rather expanding the edges of our existing small towns. Some modest density and low impact uses should be encouraged, perhaps allowing 4 plex density and small-scale visitor

accommodations- Inns, B & B that reinforce the economic viability of our existing rural communities.

The concept of Urban Service Areas, previously Infrastructure Preferred Areas, is appropriate, if we are to direct and afford future growth. But, the mapping needs much attention and a matching with desired growth areas. This was tried with marginal success in the Kona CDP when desired growth opportunity areas transitioned to urban style transit-oriented development nodes. If we identify where we can afford to grow, we can decide how to fund it and who the partners are to help realize the desired outcomes. Water is the true limitation on growth, who has access to it and where it can be delivered. DWS needs to be a key participant in this evaluation and become an active participant in developing new source capacity. Roads can follow to accommodate. Wastewater treatment for critical areas, like along the shoreline, becomes a limiting factor as well.

The County is correct to be concerned about managing sensitive resources but should not be proposing to take the lead on projects like cultural sites, water quality or anchialine ponds which are statutorily in the purview of State agencies and resources. Rather, the County should seek better ways to collaborate and cooperate to more efficiently manage the process of protecting sensitive resources.

IF Sea Level Rise is to be a primary consideration, then it should be overtly implemented in policy for land use and infrastructure, e.g.: like along Alii Drive; for Kailua and Hilo Redevelopment; and, what retrofit actions are appropriate- like mauka makai connectors such as Lako Street extension and alternative lateral access routes outside its reach like Keauhou to Kahului parkway corridor.

The GP is a long-range policy plan and the inclusion of specific standards therein is a mistake which is more appropriately dealt with in zoning and other codes. The GP should not be proposing to get the County into new business like a native plant nursery but rather to encourage private sector to take the risks and rewards.

The new Land Use Maps need LOTS of work. The maps should start by upholding the goals and visions of the CDPs already adopted. The Urban Growth Boundary and Urban Service Areas need to be further developed and Rural areas better defined. Elimination of the Urban Expansion designation, replacing it with Low Density Urban, is a BIG mistake, that displays sprawl where it is not desired or appropriate! The policy 572 on no

use of SLU Conservation lands is also a mistake, given the history of its creation as one of the catch all designations after Urban and Rural were designated in its initial creation. Future use within the SLU Ag and Conservation designated areas within the Urban Growth Boundary, and particularly when also within Urban Service Areas, should be seriously considered and supported where sensitive resources are appropriately accommodated. Why is Light Industrial being extended into Kainaliu-Honalo, policy 529, and not listed in Kaloko-Honokohau or Kailua where it exists today? There is so much more to get right here, so much re-work to do.

Lastly, the greatest missed opportunity is in the Actions not creating the much needed tools to effectively implement the desired transfer of development rights and Eco System credits or of creating the much needed financing tools of Tax Increment Financing, Community Facility District and Impact Fees which are used so effectively in other jurisdictions.

This GP update is the opportunity to get the future right and much needs to be done to it to enable a bright future. I look forward to seeing refinements of the Draft and to continuing to be a participant in that effort.

Aloha,

