

Mori, Ashley

From: Morrison, Bethany
Sent: Wednesday, October 30, 2019 3:25 PM
To: General Plan
Subject: FW: Comments of GP 2040 Draft
Attachments: 2019 GP draft comments [REDACTED].pdf

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COUNTY OF HAWAII

From: [REDACTED]
Sent: Wednesday, October 30, 2019 3:21 PM
To: Morrison, Bethany <Bethany.Morrison@hawaiicounty.gov>; Surprenant, April <April.Surprenant@hawaiicounty.gov>
Cc: Yee, Michael <Michael.Yee@hawaiicounty.gov>
Subject: Comments of GP 2040 Draft

April and Bethany

First off I'd like to commend you and your team for the outreach. The volume of opportunities for the public to engage the process has been impressive. Making it convenient for the public has been a major positive for this effort.

My comments and suggestions are attached. I have a few areas where I believe further conversation could be useful so I hope that an opportunity will arise when we can talk. If you have the time please let me know.

[REDACTED]

COMMENTS ON THE GENERAL PLAN 2040 – AUGUST 2019 DRAFT

October 31, 2019

OUTREACH

The outreach through numerous community meetings at times convenient for the residents has been impressive. The people working on the GP have done a good job in this area.

COMMUNITY DEVELOPMENT - HOUSING

There are many topics covered by the GP ranging from Natural Resources to Housing. Topics such as Natural Resources focus on selected preservation which is accomplished primarily through research and regulation. Other topics such as Housing focus on what needs to be created. While regulation can encourage housing development that alone will not create what is needed and thus the county needs to take an active role in developing such uses.

In the area of community development the county has the responsibility of being the master developer of the island. That role requires the county to identify what should be preserved, what should be developed, where and how. For housing, the GP can guide this by indicating the general areas where growth can realistically occur, how much and where the housing can feasibly be developed and identifying a path to achieve that.

A detailed housing development plan is beyond the scope of the GP, instead the GP should call for an Affordable Workforce Housing Development Plan and Program that projects the number of housing units that can and should be built in various districts/communities; the level of affordability needed in those areas; the type and capacity of infrastructure needed to support that development; reservation of specific infrastructure capacity particularly for the low and moderate income units; a financing strategy to make that happen, and implementing actions to set the framework work for the development of housing needed by the residents.

Residential use is by far the largest urban land use so the Affordable Workforce Housing Development Plan and Program needs to be an interagency effort and should be lead by the Planning Department. The Planning Department is the only department that is charged with pulling together the various departments' efforts in community development. No other department or agency has such an integrative function nor the personnel trained to do it.

The GP should also call for development of a county system that will indicates to agencies which housing project to assist. This allows the departments to provide flexibility in order to facilitate housing development without compromising their standards across the board. Without the active support and involvement of the county departments the communities' needs for reasonably priced housing will continue to lose ground.

Specific Comments (policy #'s noted):

329a The Planning Department shall institute an Affordable Workforce Housing Development Plan and Program for the island that will identify housing development goals for the various districts and communities on the island.

329b The Affordable Workforce Housing Development Plan and Program shall initially focus on the areas of greatest housing need identifying major infrastructure constraints and the required allocation of infrastructure capacity to support the targeted level of affordable workforce housing development.

329c The County shall establish a system of identifying priority Affordable Workforce Housing projects and shall review the requirements placed on such projects with the intent of achieving the desired level of affordability.

331 The 40 year requirement will have an impact. It is critical to understand what this impact is, will it decrease the number of units using these development benefits? Will that decrease the production of housing overall? This would encourage developers to create larger lots, fewer homes? On the other hand, this may be the best way to preserve affordable housing short of placing the homes in a housing trust. Needs further consideration.

332 Comment: Not sure what this means. Is that affordable housing has priority in these areas?

333 The restriction of government facilitated or financed affordable housing to the Urban Service Areas will disallow otherwise feasible sites from being used for affordable housing. This will increase the cost and reduce the production of affordable housing, neither of which is a desirable outcome. Suggest that this policy be reconsidered as it is detrimental to the creation of more affordable housing. The county can help facilitate the development of affordable housing but to outright disallow the use of government financing and other assistance outside of the Urban Service Area is a major blow to affordable housing development.

335 Good idea.

338 This policy goal should not be a requirement. It can be encouraged but should not be a requirement. Diversity can and is achieved by having a variety of projects, however, within a project the economies of scale helps lower costs.

Actions:

XXX The County shall develop the Kumakoa Nui Project in Waikoloa.

INFRASTRUCTURE

Having adequate off site infrastructure is critical in developing housing. To the extent that the projects are required to bear the cost of off-site community infrastructure the feasibility of the projects declines and the costs and prices rise. That is not a desirable outcome. The GP should state as a policy that the county shall work to provide adequate infrastructure for housing development.

Where infrastructure is available or will be made available, infrastructure capacity needs to be reserved for affordable housing development. In the past OHCD has provided CDBG funding for water development with a reservation for affordable housing. While this has been useful it should not be a requirement that infrastructure funding is provided specifically for affordable housing while other land uses benefit from existing community systems. It should be a matter of course that infrastructure capacity be reserved for housing regardless of the source of funding. This should apply to water and sewer systems as well as road capacity.

Specific Comments:

122a Water for affordable workforce housing needs to be reserved to facilitate such development. The amount reserved should initially be at least 50% of the available source capacity for each system. The reservation should be allocated to projects based on a determination by the County Administration that the proposed project is consistent with the housing needs of the area served by that water system. Allocation of capacity should include source, storage and transmission capacity.

Action 2.17 (a) Set aside capacity for affordable workforce housing to implement Policy 122a.

138a Wastewater treatment capacity for affordable workforce housing needs to be reserved to facilitate such development. The reservation should be allocated based on a determination by the County Administration that the proposed project is consistent with the housing needs of the area served by that wastewater system. Allocation of capacity should include treatment and transmission capacity.

Action 2.XX Set aside capacity for affordable workforce housing to implement Policy 138a.

Transportation

164 Prioritize transportation investment to facilitate the development of affordable workforce housing [expand the multimodal transportation system].

165 Before calling for Impact Fees for new development there should be the development of a financing plan for roads, water, and sewer. Impact Fees may well be part of the financing plan but it should be integrated with other tools as it alone will not be effective for the long term. Impact fee imposition will increase the cost of affordable housing, that impact should be considered in designing the financing plan.

As an aside, Impact Fees have traditionally been levied only on residential uses. This is inappropriate as all land uses utilize the roadway system. Same for other public facilities

In general, community infrastructure should be financed on a community wide basis rather than singling out new development. Most of the users of the impact fee financed infrastructure are already in the community just residing elsewhere so new housing is not adding to the overall demand. Further, all parties can use all of the public infrastructure so to single out specific projects to pay for it is inherently unequal.

Imposing Impact Fees on affordable housing projects ultimately means that homebuyer will have to add that amount to their mortgage increasing the downpayment and monthly payments required. Other financing methods which spread out the costs over the broader community have much less impact on affordable housing projects.

203 Integration of land use planning and transportation should optimize use of all transportation systems and not solely transit. Right now transit use is a very small part of the transportation system, it will grow over time but it will remain a minor element throughout the 2040 time horizon. Being Data Driven consider this:

Mass transit ridership – High of 1,200,000 rides per year

Total Big Island households = 67,054

Ave Daily Trips/Household = 10+

Ave Daily Trips Big Island Households = $67,054 \times 10 = 670,054$

Total Annual Trips Big Island Households = $670,054 \times 365 = 244,747,100$

Mass Transit Ridership as percentage of Total Trips = $1,200,000 / 244,747,100 = 0.0049 = 0.49\%$

When addressing integration of land use and transportation the relatively small significance of transit should not be overstated. Doing so will unnecessarily distort land use decision making by forcing land use to conform to a minor network and de-emphasizing development in areas that can feasibly support community needs such as affordable housing.

Finance

605 See prior comment on Policy 165. Further, carving out areas exempt from the fees such as Urban Service Areas effectively changes the fee to a tax for which the county does not have state enabling taxation legislation. The rational nexus for the fee is broken.

EFFICIENCY CAN BE OVERDONE

Much of the thrust of the plan is aiming toward efficient compact transit oriented communities. Such communities make for efficient provision of infrastructure and services, i.e, the delivery of government functions. At the same time the drive for this efficiency can limit opportunities to create affordable housing by severely restricting their location, channeling them into higher cost areas. This dynamic tension between creating affordable housing and creating compact communities in the face of great demand will result in the need for greater and more widespread subsidies or more likely a growing shortage of housing.

GENERAL PLAN FUTURE LAND USE MAPS

The areas designated for urban development are drawn too precisely. As part of the General Plan the maps should indicate where growth should go generally. The precision of the maps indicates a specific limit to such growth over the next 20 years. Given the multitude of variables that affect community development, including untold number of unforeseen events, it is not reasonable to expect precision when planning for the next 20 plus years. While interim amendments and 5 year reviews provide opportunities for adjustment they are going to be very time consuming and will limit the flexibility that county will need to achieve its goals. Instead, the GP Future Land Use maps should indicate the general growth locations without hard boundaries. In fact, the hard Urban Growth Boundary at the GP level should be eliminated.

Consider the role of the GP in the community planning process. The GP functions like the programming and bubble diagram design phase, the CDP's provide schematic level community design while the zoning and Capital Improvements Program provide the detailed implementation. Taking the CDP maps and elevating them to the GP Future Land Use Maps inverts the appropriate hierarchy and logical flow of plans. Similarly taking the zoning level maps and installing them in the CDP is in error. Adding unwarranted detail in the higher level plans limits their ability to respond to changing conditions and opportunities. To respond to these changing conditions and opportunities the detail laden plans will have to be amended. The task of amending the plans brought on by unnecessary detail is progressively more difficult, i.e., amending the GP is a more a comprehensive and consuming task than amending a CDP. A similar relationship exists between the CDP's and zoning/CIP where a zone/CIP change is a considerably smaller and limited task. The increased need for amendments to the higher level but detailed plans will frustrate the county's ability to achieve its own goals and policies as events unfold.

Transit Oriented Development is functional only to the extent that transit is used. By focusing services and housing in these areas as a matter of priority non-transit users are forced to drive there which creates congestion. It is fine to allow density and services around transit stations, it is not helpful to prioritize such density and services to the stations in view of their very light useage.

This is not to diminish the desirability of transit, however, at 00.49% of all trips its relative impact in shaping the urban environment on the Big Island is quite limited.

Specific Comments:

The Urban Service Area as a regulatory device should be dropped. To limit certain type of development to those areas set up constraints that can limit the development of affordable housing or other community needs. Much of the area within the Hilo Urban Service Area lacks sewers as does the rest of Hilo. To limit government assisted housing to the Urban Service Area (see Policy 333) is not logical and will result in lost opportunities.

The Low Density Urban areas should allow for more density and diversity. The current limit is 6 units per acre, roughly RS-7.5. As drawn the LUPAG for the Keahole to Kailua area essentially calls for urban sprawl over an area larger than the city of Hilo. If infrastructure investment is to be focused in this area it should be made to produce housing at a much greater density. Further, community services should be allowed or we will end up with large residential areas with little if any services. Gas stations, convenience stores, restaurants, personal services are daily life essentials and provisions need to be made for them. Similarly small office locations can be dispersed.

The Low Density Urban density limit should be raised to 10 units or more per acre. This will allow greater density and more diversity of housing. Consider the Pacific Heights Development off of Kukuau Street in Hilo. This mixed residential development could be replicated in many Low Density Urban areas. Further, appropriate complementary non-residential uses should be allowed in Low Density Urban areas similar to what is allowed in Medium Density Urban.

The retention of the Urban Expansion designation should be considered especially for areas where specific plans are not yet developed. For example the Keahole to Kailua area offers many possibilities for efficient and diverse development, i.e., a chance to create communities that serve a variety of needs.

Puna District – GP Future Land Use Map

Designated urban areas are too limited and too precisely drawn. The Kurtistown Village is an example. This settlement has a commercial core, a post office, a park, and a county baseyard. Should residential growth around this core be required to secure a General Plan amendment? Creating a larger settlement with services in Kurtistown is just as likely if not more so than the proposed Medium Density Urban area in Hawaiian Paradise Park. This issue could be resolved by generalizing the area that would be useable for residential and other urban uses.

Similar situations exist around all of the established settlement areas such as Pahoa, Keaau, and Mountain View.

Note: HICDC has acquired a Kurtistown parcel TMK: 1-7-17: 3 which we will seek rezoning to allow subdivision of 10,000 SF lots for self help housing. The self help builders will be at 80% of the area median income and below.

South Hilo – GP Future Land Use Map

There are under utilized sewage treatment plants in Pepekeo and Papaikou/Paukaa. Appropriate growth meeting the community's needs should be encouraged there.

The underlying logic of the Urban Service Area should be explained. Is it based on the sewer line extension plans? Much of the city is being left out, including areas that could be provided w sewer lines.

The University designated areas should be reconsidered, especially along the Mohouli Street extension where residential use could be developed. The UHH Master Plan shows a major sports complex in this area, something that is unlikely to happen. Meanwhile, residential development is feasible as much of the needed infrastructure is in place.

Overall the lines are too precise and should be generalized.

North Hilo and Hamakua – GP Future Land Use Map

Overall the lines are too precise and should be generalized.

North Kohala – GP Future Land Use Map

Overall the lines are too precise and should be generalized.

South Kohala – GP Future Land Use Map

The Kumakoa Nui project lies outside of the Urban Service Area, can it's development into workforce housing be facilitated by the County?

Overall the lines are too precise and should be generalized.

North Kona – GP Future Land Use Map

Overall the lines are too precise and should be generalized.

HICDC has a 100 unit affordable rental project under development on TMK 7-3-9: 32. This area is designated as Low Density Urban and is outside of the Urban Service Area. To limit the bulk of this region to Low Density Urban misses the opportunity to create a mix density mixed use urban area. The development of the entire area will extend beyond 2040 but it will be influenced by what this plan lays out.

The logic of the placement of the Urban Service Area needs to be spelled out. The limitations implied by this designation can detrimentally impact future development.

Question: Will the Resort designations on the Future Land Use GP, or the lack thereof, define where vacation rentals are permitted?

South Kona – GP Future Land Use Map

Overall the lines are too precise and should be generalized.

What proposal created the resort designation makai of Kealahou town?

Kau – GP Future Land Use Map

Overall the lines are too precise and should be generalized.