

Mori, Ashley

From: [REDACTED]
Sent: Wednesday, October 30, 2019 11:13 PM
To: General Plan
Subject: General Plan - Opposition to Action 4.97
Attachments: General Plan Action 4.97 Comments [REDACTED]

Aloha,

Please see the attached letter as comments to the General Plan regarding Action 4.97, which we are opposed to.

Mahalo nui,
[REDACTED]

2019 OCT 31 PM 8 42
PLANNING DEPARTMENT
COUNTY OF HAWAII

128955



October 30, 2019

TO: County of Hawai'i Planning Department
Aupuni Center
101 Pauahi Street, Suite 3
Hilo, HI 96760

RE: General Plan 2040 – Opposition to Action 4.97

Aloha mai,

This letter is to submit comments for the Hawai'i County General Plan draft regarding Action 4.97, which states:

“Perform a feasibility study on developing a scenic route from Waipi'o Valley Lookout extending mauka to connect Mud Lane at the entrance of Waimea and a scenic park with a viewing area of Hi'ilawe Falls.”

We would like to respectfully request that this Action 4.97 be removed from the General Plan, as this Action does not align with the Sustainability Objective, Policy 447 (a), (c), (d), & (e), and Policy 458 when analyzed for unintended consequences and the complexity of the situation.

A “scenic route” and “scenic park” to view Waipi'o Valley & Hi'ilawe Waterfall would not help to preserve the scenic nature of Waipi'o Valley and the rimlands of Wapi'o Valley, as it encourages rampant tourism that is already occurring without a better view of Waipi'o Valley and Hi'ilawe. (Sustainability Objective)

The natural and cultural landscape of Waipi'o Valley with it's cliffs, waterfalls, lo'i kalo (wetland taro) systems, rivers, ridges, and bay would be further promoted with an easily accessible viewing area of the entire valley and Hi'ilawe Waterfall, giving tourist a further temptation to trek into Waipi'o Valley via the current access road that is dangerous, overwhelmed, and completely open to the public. (Policy 447 (a), (c), (d), & (e)).

A “scenic route” and “scenic park” as described in Action 4.97 would not be an appropriate Heritage Corridor and Scenic Byway” for the reasons enumerated below.

Action 4.97 is misguided and should be removed from the Hawai'i County General Plan for the following reasons detailed below:

- LAND OWNERSHIP

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- The lands adjacent to Mud Lane and Waipi'o Valley are privately owned by Kamehameha Schools, Lalakea Family Trust, and other private land owners, with no public roads accessing the area from Mud Lane.
- The land parcels that this feasibility study would look at are valued at approximately \$15 million, with other privately owned parcels possibly included increasing the cost of any purchase, if the landowners are even open to selling their lands.

• NATIVE ECOSYSTEMS PUT AT RISK

- The rimlands of Waipi'o Valley was once a thriving forest in which our chants speak of how the 'ōhi'a would be seen all along the cliffs. The Hāmākua Sugar Plantation killed most of the native and endemic trees to plant sugarcane. After the closing of the plantation, eucalyptus was planted. Throughout the area, there is still old 'ōhi'a trees and other native and endemic trees that survived.
- The endemic & culturally important 'Ōhi'a trees existence is threatened by Rapid 'Ōhi'a Death (ROD), a fungal disease that has killed thousands of trees across Hawai'i Island.
 - ◆ The 'Ōhi'a trees in the rimlands of Waipi'o Valley currently do not have ROD, unlike Kalopā State Park where large old, growth 'Ōhi'a have been infected with ROD. The vast amounts of ROD free, old growth 'ōhi'a above Waipi'o Valley should be protected. A "scenic route" and "scenic park" would put these culturally important and endemic trees at unnecessary risk.

• EROSION & LANDSLIDE IMPACTS TO VALLEY BELOW

- Landslides into Waipi'o Valley have occurred from the rimlands in recent years and decades, posing a safety risk to the valley.
 - ◆ Having a scenic park to view Hi'ilawe Waterfalls will most likely be close to the edge of Waipi'o Valley's cliff.
- Mauna Kea Soil & Water Conservation District have shown through topographic maps that the rim & cliffs being discussed have multiple surface water drainage areas down the cliff that pose further landslide risks and possibly large land sections breaking free.

• CURRENT STEWARDSHIP

- The lands of Kamehameha Schools are currently being stewarded by Pōhāhā I Ka Lani for low-impact, low-use cultural education & land stewardship programs aimed at perpetuating the culture and native ecosystems of the rimlands and Waipi'o Valley.

- Pōhāhā I Ka Lani ensures that the shoes of each person and tires of each vehicle that comes with us to the rim lands is sprayed with alcohol and/or bleach to prevent ROD.
- Through our stewardship that officially began in March 2019, with the help of many schools, organizations and families, we have been planting more endemic, native and beneficial plants and trees.
- Pōhāhā I Ka Lani has begun installing soil stabilizing vetiver grass along the rim to address erosion & surface water to prevent future landslides.
 - ◆ Are the efforts of trying to help prevent erosion & landslide impacts going to be useless if such road, park and heavy traffic introduced to the area?
 - ◆ Thousands of dollars were spent by Pōhāhā I Ka Lani to install vetiver, but only could afford one line and will save up and put additional lines of vetiver along the rim. If anyone sees the large amount of people at Waipi‘o Valley Lookout area, its terrifying to think what that large amount of people would do to the rimlands.

- PROBLEMATIC TOURIST TRAFFIC EXPANSION INTO RIMLANDS

- Tourist traffic, already a significant problem for Waipi‘o Valley Lookout, Access Road, and the valley itself, would be expanded to be allowed to access the rimland areas.
- The wording of the “developing a scenic route from Waipi‘o Valley Lookout extending mauka to connect Mud Lane at the entrance of Waimea and a scenic park with a viewing area of Hi‘ilawe Falls” seems like they are still going to utilize the old Waipi‘o Valley Lookout area and just offer additional viewing space.
- Tourists already drive 4x4 rental vehicles into Waipi‘o Valley causing dangerous situations when their rental contracts prohibit them from doing so, causing the rental vehicle insurance to be voided.
- Tourists who access Waipi‘o Valley are unsupervised and unregulated, and show a lack of respect and restraint, driving and walking into private lands, therefore trespassing, disrupting the community and ecosystems, and disrespecting cultural traditions & sites.
 - ◆ The rimlands would be subject to the same type of issues.

- WAIPI‘O VALLEY ACCESS ROAD SAFETY STILL UNRESOLVED

- The Waipi‘o Valley Access Road has current safety issues, such as a major landslide up to the edge of the road on the makai side, narrow sections, unmarked vehicle by-pass areas, continual landslides coming down onto the road from the mauka side, and numerous potholes.

- Repairs to the Waipi'o Valley Access Road were discussed 4 years ago in 2015, with proposed repair plans estimated at over \$4 million and no timeframe of when those repairs will be made due to funding being an issue.
- Lack of funding for the Waipi'o Valley Access Road shows that there is likely a lack of funds for the scenic route and scenic park being proposed in this feasibility study, let alone long term maintenance costs and management.

- INCREASED TRAFFIC INTO WAIPI'O VALLEY DUE TO VIEWING FROM ABOVE

- Previous commercial tours at the Waipi'o Valley rimlands at the Hi'ilawe viewing areas promoted the valley, enticing the public to access the valley afterwards, roaming the valley, going beyond public roads & areas, and trespassing on private property, especially trespassing to Hi'ilawe Waterfall.
 - ◆ While previous commercial tours in the above Waipi'o Valley were in operations, tour guides from those tours were regularly observed leading illegal tours up to Hi'ilawe Waterfalls. When these tour guides were asked what are they doing, they would state that their customers saw Hi'ilawe Waterfall from above and now want to see it from below by hiking to it.
- Community discussions have mentioned closing Waipi'o Valley road and only allowing residents & managed access into Waipi'o Valley, but the wording in the General Plan for a "scenic route" and "scenic park" would largely be promoted for visitors to go the current Waipi'o Valley Lookout and also to a proposed Hi'ilawe Waterfall viewing area.
 - ◆ Restricting tourist traffic into the valley has not been addressed, and if the current Waipi'o Valley Lookout is still open and if they create a park to view Hi'ilawe Waterfalls is still open, it will create more disaster for the Waipi'o Valley Access Road, the residents & farmers, and the valley itself.
- Farmers & residents below are left to deal with complications of the actions being done above and how it affects the valley below.

- EUCALYPTUS TREES

- The area is still heavily filled with eucalyptus trees, and trees regularly uproot or snap and fall on roadways, posing a regular safety hazard. Roads are regularly cleared of fallen eucalyptus trees currently.
- The Eucalyptus trees are possibly to sold to the Pepe'ekeo bioenergy plant under the company Honua Ola, however that project is in question due to environmental concerns and legal challenges.

- ◆ It is not clear if and when Honua Ola (FKA Hū Honua) might harvest the Eucalyptus trees.
- ◆ If the trees are not harvested, a long-term plan should be made keep the area as low-impact and low-use with the gradual transition of the area to reforestation and subsistence commercial agriculture, which Pōhāhā I Ka Lani is working towards on lands not encumbered with eucalyptus trees. This aligns with the recently passed 2019 Hawaii County Council Resolution 322-19, which acknowledges the current climate change crisis and the need to do mitigating measures such as reducing fossil fuel consumption, reforestation and subsistence agriculture.
- A concern is that “a scenic route” would pave the way for an easy entrance and exit for Honua Ola (FKA Hū Honua) to transport harvested eucalyptus for decades.

• MANAGEMENT & MONITORING

- How will monitoring to make sure Rapid ‘Ōhi‘a Death is prevented by decontamination of all tires of vehicles and shoes of each individual? Tires and shoes will need to be sprayed with alcohol and/or bleach before heading into the rimlands?
- How will management of tourist and public traffic in general be prevented from trespassing into other areas of the rimlands where larger areas of the native ecosystems exist and dangerous roads remain?
- How will safety be addressed with the area being prone to flooding with heavy rains from mauka areas?

Please contact with any questions at [REDACTED]

Sincerely,

[REDACTED]

CC: