

Mori, Ashley

From: [REDACTED]
Sent: Thursday, October 31, 2019 2:01 PM
To: General Plan
Subject: Comments on the Draft General Plan 2040
Attachments: North Kohala CDP Comments on GP 2040 First Draft.docx; ATT00001.htm

Aloha.

Please find the attached comments from the ad hoc committee of the North Kohala CDP. Feel free to contact me if you have any questions or need further assistance.

Thank you. [REDACTED]

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PLANNING DEPARTMENT
COUNTY OF HAWAII

October 31st, 2019

To: The Planning Department

From: The *ad hoc* committee of the North Kohala CDP to review and comment on the General Plan 2040 Draft.

Members: Jeff Coakley, Steve Hoffmann, John Winter, Toni Withington, Carter Collins, Teri Takata, Beth Robinson, Sarah Pule Fujii, Gale Perez, Alek Chen, Clarence Perez and the chairs (Andi Longpre, Jack Hoyt, Susan Fischer, Jim Pedersen, Ted Matsuda, Jim Trump) and members of the Groups implementing the NKCDP: Community Access, Growth Management, Parks Water and Roads, Power Viewplanes and Erosion Control, Affordable Housing and Agriculture.

Re: Public comments on the first General Plan 2040 Draft .

We are submitting our comments on the first draft of the revised 2040 General Plan. Each Group working with the North Kohala CDP Action Committee was asked to review the portions of the Plan associated with their areas of responsibility and expertise. Rather than list our suggestions in the order in which they appear in the draft, we have chosen to order them by subject matter (Group input). We have been careful to cite appropriate page numbers, however, so as to make clear the proper place in the Draft Plan that each comment refers. Our comments are submitted in the spirit of improving the General Plan 2040 and the island. They are not intended as criticisms or complaints.

In general, we are pleased with this draft. We salute your many aspirational Goals and Policy statements. The integration of the Island CDPs into the Plan is very welcome.

We do wonder about factor #4 on p.5, however. It states that a land use decision must only be consistent with the General Plan and not necessarily any CDP. We would like to see the CDPs included here as well.

While attending the Speakouts, various Group leaders got different impressions of what Planning wanted in their comments. Rather than attempt to reinterpret or edit for consistency we opted to honor each Group's input. As a result, the sections below from the Groups will vary in style.

Parks, Water and Roads Group (infrastructure) of the NKCDP

- **Parks.**

PROMOTING ACTIVE LIVING THROUGH RECREATION, TRAILS, & PUBLIC ACCESS -
Recreational Facilities & Programs (p. 97 - 100)

Policy 391 p. 98 is good, as are Action steps 4.36, 4.40, and 4.43, but expand to enhance contact between P&R maintenance personnel and Friends-of-the Park or other representatives for every County park, perhaps monthly meetings.

Rationale. North Kohala has benefitted by having Parks and Rec. maintenance personnel meet monthly with representatives from every park in our district to discuss maintenance needs and plans. We have set this up on our own initiative, but it should be done in every district.

- **Alternative routes for emergencies** p. 30 #79 p. 31 #92 #1.51 p. 33 #1.54 p. 34 #1.54 p.55 2.67 p. 60 #204 p. 103 #414

MITIGATING & ADAPTING TO HAZARDS & CLIMATE CHANGE (p. 27 - 35)

In Action steps on p. 32 add a line to work on streamlining a declaration of emergency by HCCDA.

Rationale: For areas with only one through highway (e.g. the Akoni Pule Highway in North Kohala), when that highway is blocked, we have cleared and prepared Pratt Road as an

emergency bypass. But only by quick action by HCCDA can an emergency be declared to offset landowner liability, allowing traffic to be diverted to Pratt. Right now, this takes far too long.

- **Drinking water** p. 41-42

MANAGING WATER SYSTEM RESOURCES (p. 38 - 48)

In Action steps on p. 42 add a line to improve ageing potable water systems and phase out “spaghetti lines” (long runs from meter to household) by running county lines to property boundaries and relocating meters there.

Rationale. Many county areas have very old potable distribution systems inherited from plantation era. Many households in North Kohala have water meters up to a quarter mile from their homes.

- **Greenwaste** p. 49 esp. 2.48 b is great. Also p. 51 155a p. 80 #3.23

INCREASING RESOURCE RECOVERY & REDUCING WASTE (p. 48 - 52)

In Action steps on p. 49-50 add lines

- Support and implement methods and regulations to reduce solid waste going to the County landfill.
 - Implement zero waste at public events.
 - 2.48 g is excellent: Need to phase out single-use plastics. Make this stronger.
 - Need more hazardous waste facilities in communities.
 - Initiate non-recycle fees to merchants and local suppliers who sell or use single-use plastic packaging.
- Promote local industries that can convert non-recyclable items to innovative products (e.g. plastics into pavement material, furniture/household items or apparel).
- Need to address spread of invasive species from County greenwaste compost program.

Rationale. Given the recent setbacks in county recycling, the nature of waste on an isolated island, and the limited lifespan of the landfill, we should do everything possible to reduce the trash going into our transfer stations. Many areas, including North Kohala have no neighborhood place to put hazardous waste. Many residents simply throw it away.

- **Pedestrian walkways and bicycle routes:** p. 55 #2.65 p. 57 #189 p. 60 #199 p.61 #2.87 #2.88 railroad RoW. p. 60-1 See also Public Access p. 102 - 103 #407, 412, 4.50

IMPROVING TRANSPORTATION SYSTEMS (p. 52 - 56)

In Action steps on p. 55 add a line

- Consider pavements of bicycle and pedestrian routes that incorporates trash items (e.g. plastic) or that produce energy (solar panels).

Rationale. Such initiatives not only reduce items that would otherwise clog the County landfill, but also reduce the consumption of imported pavement materials. Solar panels could contribute to renewable energy production and reduce consumption of oil and the associated greenhouse gas emission.

- **Agricultural Water:** p. 82 - 83.

PRIORITIZING AGRICULTURE & FOOD SECURITY (p. 78 - 83)

In Action steps on p. 83 add a line to seek and promote funding from State and Federal grant sources for Agricultural water systems.

- Need to address spread of invasive species from County greenwaste compost program.

Rationale. Given the recent setbacks in county recycling, the nature of waste on an isolated island, and the limited lifespan of the landfill, we should do everything possible to reduce the trash going into our transfer stations. Many areas, including North Kohala have no neighborhood place to put hazardous waste. Many residents simply throw it away.

Growth Management Group of the NKCDP Additions in red.

Section 5: Land Use Planning (p.119 - 155).

GOALS

5. Hawai'i will strategically use progressive planning strategies to direct and manage growth and development to protect natural resources, ensure the safety of residents and visitors, and enhance the quality of life. The **principal** land use strategy for design and implementation will focus on achieving a sense of place by protecting and enhancing community character through natural systems planning, smart growth strategies, and compatible land use planning that incorporates culture and equity into the planning and decision-making process.

a) Direct growth and increase density towards urban and village centers; **Yes, this is consistent with the North Kohala CDP Priority 3.1**

d) Discourage sprawl outside of designated urban centers; **Again NKCDP Priority 3.1**

e) Provide multimodal transportation to and within urban and village centers; **NKCDP calls for improved bus transport and bikeways and trails.**

f) Encourage a mix of uses to build livable communities that provide residents with opportunities for employment near affordable housing, together with access to commercial and recreational opportunities. **NKCDP Affordable Housing Priority 3.1**

ENSURING LAND USE COMPATIBILITY - POLICY (p. 119 - 121)

POLICY 461. Plan approval and related conditions shall consider forest and coastal ecosystems, agricultural lands, open space, viewscapes, areas of natural beauty, archeological and historic sites, and historic buildings when assuring that proper siting is provided for, proper landscaping is provided, unsightly areas are properly screened or eliminated, and natural and man-made features of community value are preserved. [Rationale: Based on HCC 25-2-77(a) & 76, HCC 23-26, Ka'ū CDP Policy 14; **North Kohala CDP Strategy1.9** see also General Plan 8.2 Goals and 8.3 Policies.]

462. The County shall reevaluate projects for consistency with the General Plan and applicable Community Development Plans during review of time extension requests for discretionary approvals. [Rationale: Based on consultation with Planning Division staff regarding issues with approved project proposals that remain undeveloped and are allowed to retain entitlements in perpetuity that were approved for a specific project and specific circumstances. At times, this may 'tie up' infrastructure commitments that aren't being used, it can impact desired density for land use areas, and it has been used as a speculative real estate strategy to resell the undeveloped property with the enhanced entitlements. See also Maui County Planning Commission Chapter 202 Special Management Area Rules.] **Highly approve this wording. The failed resort and subdivision at Mahukona, subject to multiple time extensions that lasted over 23 years, kept the County from improving the now-condemned park facilities at Mahukona and Kapa'a Parks. Also kept the parks from potable water service for 30 years and improvements to Mahukona and Kapa'a access roads.**

464. Zoning requests shall be reviewed with respect to General Plan designation, district goals, regional plans, State Land Use District, compatibility with adjacent zoned uses, availability of

public roads and services, utilities, and public need. [Rationale: Based on General Plan 14.1.4 Standards (b).] **NKCDP Priority 3.1**

468. The County should carefully evaluate and condition, as appropriate, any rezoning that would negatively impact agricultural lands or culturally, visually and environmentally important open spaces or resources. **North Kohala CDP Priority 3.2, Growth Management Strategy 1.7 & 1.9**

ACTION 5.1 Amend zoning code and/or administrative rules to set up criteria for incremental zoning approvals to be reviewed and develop criteria for these approvals to be revoked, including expiration deadlines, etc. [Code] **The NKCDP talks about this problem and calls for new procedures on time extensions.**

5.5 Develop subdivision standards that make a distinction between agricultural rural, and urban land uses. **North Kohala CDP Policy 2.5 establish rural infrastructure standards to maintain the rural character and reduce costs for affordable housing.**

ENSURING LAND USE COMPATIBILITY - RURAL (p. 129 - 131)

Policy 547. Prioritize the rehabilitation and utilization of designated resort areas that are presently serviced by basic facilities and utilities before allowing new resorts in undeveloped coastal areas. [Rationale: Based on General Plan Policy 14.7.3 (c) and Ka'ū CDP Policy 5.] 548. **North Kohala CDP Growth Management Strategy 1.2 – Acquire coastal lands that should be preserved in open space – specifically Mahukona, Kukuipahu, Kaiholena and Pao'o. Mahukona has no utilities.**

551. The designation of any new resort areas shall require analysis of the character of the area; the immediate and surrounding environment, natural resources and beauty, cultural practices and cultural resources; shoreline public access; and nearby affordable housing concurrent with the demand created by the development. [Rationale: Based on General Plan Policies 2.4.9.2 (a & c), 9.3(g), 14.7.2(c), 14.7.3(i), 14.7.5.9.2(a)), and Ka'ū CDP Policy 6 **North Kohala CDP Strategy 1/1 Acquire coastal lands that should be preserved as open space.**]

552. The development of visitor accommodations and any resort development should complement the character of the area, protect the environment and natural beauty, cultural practices, and cultural resources, provide shoreline public access, and provide affordable housing to meet demand created by the development. **See above**

553. Designate and allocate future resort areas in appropriate proportions and in keeping with the social, economic, and physical environments of the County. **See above**

ENSURING LAND USE COMPATIBILITY - AGRICULTURAL (p. 137 - 1421)

POLICY 555. Agricultural lands shall not be rezoned to parcels too small to support economically viable farming units. [Rationale: Based on General Plan Policy 14.2.3 (s), Ka'ū CDP Policy 36.] **A recommendation of the NKCDP.**

557. Development and construction in “Productive Agricultural” and “Pastoral” areas shall be limited to agriculture, related economic infrastructure and cottage industries, renewable energy, open area recreational uses, and community facilities unless otherwise permitted by law. [Rationale: Based on Ka'ū Policy 38, Hāmākua Policy 21. **North Kohala CDP Growth Management Strategy 1.4**]

558. When considering applications to consolidate and resubdivide pre-existing lots of record, lots less than one acre in size in the State Land Use Agricultural district shall only be permitted if that land utilization is improved relative to the objectives and policies of the General Plan. [Rationale: Based on Hāmākua CDP Policy 22, Ka'ū Policy 43, HRS 205-5(b)) and General Plan Policy 14.2.3 (s).] **North Kohala's landscape has been changed dramatically by consolidations/re-**

subdivisions, some of which were made by legalizing lots of record that were way too small to allow any permitted activity. This provision would help, but not solve this problem.

559. A maximum developable area shall be established for lots designated as Productive Agricultural Land. Maximum Developable Area (MDA): Means the total floor area in square feet allowed under the approved land use. The floor area computation shall include: all floor areas under roof, including first, second, and third story areas, decks, pools, saunas; garage or carport, and other above ground structures. **Yes, this will help discourage giant mansions on what should be agricultural land.**

560 Through permit conditions, development agreements, deed restrictions, and/or other means, ensure that areas in the “Productive Agricultural Lands” and “Pastoral” Future Land Use Policy Map categories continue to be utilized for agricultural uses and not for speculative or other residential development. [Rationale: Based on Ka‘ū CDP Policy 44 Policy 35; Puna CDP Objective 3.1.2 (f), and General Plan Policy 14.2.3 (j). **North Kohala CDP Key Policies 4. All subdivisions of agricultural lands shall include an agricultural use/production plan. Also Policy 7. Minimize speculation that drives up land values, the cost of housing]**

568. Discourage speculative residential development on agricultural lands. **See above**

ACTION. 5.19 Establish agricultural subdivision standards that:

c) mitigate against speculative development. **See Policy 4 and 7 above**

Policy 582. New urban designations shall be located away from coastal areas and the Special Management Area. [Rationale: Based on Hāmākua CDP Policy 2 and Ka‘ū CDP Policy 27. **North Kohala CDP Growth Management Strategy 1.2 Acquire coastal lands that should be preserved in open space.**]

584. The County should explore alternatives (e.g., density transfer based on gross density) for the applicant of a Special Management Area (SMA) Major Permit to dedicate to the government or land trust or encumber as open space for the purpose of realizing a shoreline linear park along as much of the coastline as possible. **See above**

585. Designate coastal areas to be preserved, protected, and connected to the rich network of natural and cultural resources. **See above**

586. Encourage those developments that are not coastal dependent to locate in inland areas. **See above**

593. Establish a Wahi Pana designation that addresses the following: a) Designate Waipi‘o and Pololū Valley, including their rims, as Wahi Pana and create a Special Area Plan that will protect the natural resources, preserve their storied past and perpetuate agricultural traditions and unique rural lifestyle; b) Designate the summits of Mauna Kea, Mauna Loa, Hualālai, and Kīlauea summit areas as Wahi Pana. c) Establish buffers on undeveloped lands around Kealahou Bay to assure preservation of the region’s unique environment and cultural resources. [Rationale: Based on General Plan Action 2.4.8. (f), and Hāmākua CDP Sections 4.9.2 and 4.9.6.] **Strongly Agree.**

Public Access Group of the NKCDP Additions in red.

Section 4: Community Placemaking (p. 89 - 117)

PROMOTING ACTIVE LIVING THROUGH RECREATION, TRAILS, & PUBLIC ACCESS

Public Access & Trails (p. 102 - 108)

SUSTAINABILITY OBJECTIVE Number of public access sites created through acquisition or easement. **This can be** or enhanced with assistance from CZM funding **and designated** staff.

POLICY 404. The County of Hawai‘i shall establish: public access to and along the shoreline to significant historic sites, public transit along the top of cliff, streams and other natural water courses, mauka trails, facilities, and access to sites for gathering, hunting, and other recreational purposes and in accordance with Hawai‘i County Code Chapter 34. [Rationale: Based on existing County Code 34, General Plan Policy 12.3 (l, m), Ka‘ū CDP Policy 81, and Hāmākua CDP Policy 48, **North Kohala CDP Priority 3.1, Strategies 2.1 to 2.6**]

408. Alignment of coastal trails shall consider flexibility for realignment for sea level rise and other dynamic shoreline changes. [Climate Change] [Rationale: Based on current status of some impacted coastal areas and research relating to projected sea level rise impacts on coastal assets. See also California Coastal Commission Sea Level Rise Policy Guidance.] **Particularly with regards to public safety.**

409. Determine the location and ownership of historic trails and roads as early as possible in the land use application process. [Rationale: Based on identified challenges with ownership of historic trails and roads and the subsequent legal implications. See also General Plan Policy 13.2.3 (q)] **Strongly agree**

412. Support the development of a Rails to Trails type program to facilitate the conversion of old railway segments to a public trail network. **Strongly agree.**

413. Seek private-public partnerships to manage and maintain public access to the shoreline, public trails, hunting areas, scenic places and vistas, and significant historic sites, buildings, and objects of public interest. [Public Access] **Agree, since the County does not have staff or funds to maintain trails.**

414. Explore options and collaborate with community groups to increase access to former sugar cane roads to be used as non-motorized trails where feasible and appropriate. **Yes, as the NKCDP recognizes specific roads as future trails and mauka-makai accessways. May also be used in an emergency for first responders when necessary. Old cane roads are excellent for bikeways as well as trails.**

ACTION 4.49 Amend code to require bicycle and walking path easements be developed in urban areas to increase walkability and multimodal transportation options. [Code] **Strongly support.**

4.50 Work with the State and adjacent landowners in establishing old railroad right-of ways as pedestrian and bicycle trails. **Yes!**

4.51 Identify by GPS coordinates all existing historic trail alignments that (a) have been recommended for preservation by SHPD, (b) appear on historic maps and/or are known by oral tradition, **or are identified in CDPs**, and incorporate these into the County GIS database.

4.54 Add public access requirements as listed in Hawai‘i County Code Chapter 34 Public Access to apply to Chapter 23 Subdivision Code, SMA review, zoning code, special permits, etc. [Code] **Strongly agree.**

4.55 Develop and implement a public-private program to establish and manage specific access points and trails. **Strongly agree**

SUSTAINABILITY OBJECTIVE Develop and maintain a public access program that integrates recreation, subsistence, and cultural access priorities.

POLICY 415. Integrate Public Access into County department priorities in the following ways: a) Incorporate public access and development into a program overseen by the Planning Department as

per Chapter 34. b) Integrate PONC property management and maintenance into the Parks and Recreation code in Chapter 2: Article 11 and Chapter 15: Parks and Recreation. c) Develop adequate staff to carry out the provisions of Chapter 2 Article 42, relating to the PONC maintenance fund (as per: Section 2-214.2 (b). Pursuant to section 10-16(c) of the Charter, the maintenance fund shall be administered and managed by the department of parks and recreation. Adequate staff to carry out the provisions of this article and section 10-16 of the Charter shall be provided in the department of parks and recreation. [Rationale: Based on identified gaps in addressing or applying public access regulations and procedures consistently between the various County Departments. The County lacks capacity to fulfill its existing public access objectives without increasing staff capacity, maintenance capacity, and without having clearer directives between the various departments to implement a cohesive public access program. **Also recommended as North Kohala CDP Strategy 2.2**] **Note: the recommendation of the Charter Commission is to shift authority for the Maintenance Fund to the Department of Finance.**

417. Consistently integrate public access development and maintenance into Parks and Recreation department priorities. **Note: This is in contradiction to 413.**

ACTION 4.56 Establish a County of Hawai'i Public Access and Trail Program with sufficient staff and resources. **[North Kohala CDP Strategy 2.2]** Staff will be required to consult/consider recommendations of this program in all permit reviews. Elements of this program may include:

i) Public accesses that cross private land will be acquired and held until appropriate management of the accesses is in place; **Note: This should not be a "forever situation" as it appears to have become in North Kohala. See Public Access Strategy 2.1.**

l) Partner with community organizations capable of assisting with public access management;
YES

Suggested addition: s) In co-sponsorship with the State when possible, establish public coastal trails on undeveloped State lands in order to connect to other trails.

4.57 Amend the subdivision code to better address public access issues in the following ways:

a) Revise/Develop enforcement protocols for public access violations, including fines for noncompliance and mechanisms to remove private obstructions from public accesses; **Note: This is desperately needed. Also need better staffing of inspection and enforcement.**

b) Review Hawai'i County Code Chapter 34 requirements for public access standards, including design that fits into surrounding community, environment, and conditions. Establish parameters for requiring appropriate right-of-way, parking, and comfort stations for various types of public accesses/trails and incorporate these into Chapter 34; **[North Kohala CDP Strategy 2.3]**

4.61 Develop procedural guidelines for renegotiating access agreements. Agree strongly.

4.62 b) Amend Charter Section 10-5 c & f to allow PONC funds to be used for the planning, design, development of new buildings, facilities, (including comfort stations) or infrastructure such as roads, paths, bridges, culverts, ramps, or drainage features if such improvements are necessary to meet the objectives of public safety and to meet the purposes outlined in Hawai'i County Code 2-214.1. [Code] Strongly support. Some, not all, of these improvements are supported in proposed amendments by the Charter Commission

d) Include assessments of tax revenue implications for lands nominated for PONC consideration. **Strongly disagree. PONC priority is determined by the many values of the land that favor public preservation, not by monetary considerations to down-grade properties. This section (d) to be removed. Tax revenue is irrelevant to nomination and acquisition of PONC lands**

4.66 a) When there are multiple lands under consideration at any one time, priority shall be given to coastal lands and lands where matching funding is available to leverage the County contribution; **Disagree. To give priority to lands with matching funds contradicts already existing protocol for selecting lands.**

b) Consideration should be given to lands within districts under-represented by PONC preservation program. [Code]**Disagree. Some districts have undeveloped lands with values considered under the prioritization process in greater share than other districts. Example: a profusion of pre-contact archaeological sites, accessible access to coastal recreation areas.**

Affordable Housing Group of the NKCDP Additions in red.

PROVIDING EQUITABLE AND SAFE HOUSING OPTIONS FOR ALL (p. 84 - 88)

We strongly support Policies 339, 340 and 342.

Policy 331. All affordable housing projects which receive development benefits, **(add; “or are associated with HR201H benefits”)** from Hawai‘i County, including but not limited to land use/zoning approvals, special approvals, conditional uses, and density bonuses, shall be required to maintain the project (or portion thereof) as affordable for a period of 40 years pursuant to deed restrictions or other mechanisms specified in the HCC.

332. Affordable and transitional housing shall be prioritized on vacant urban land already zoned for multifamily development and around transit hubs. [Rationale: Based on General Plan Goal 9.2 (d, g) and Policy 9.3 (t, x). See also the McKinsley Global Institute (MGI) report.] **(Comments; This implies that AH projects are discouraged in rural areas. A provision must be made to allow AH projects in rural communities that support housing goals for agricultural workers and the ability for local residents to live near their families.)**

333. Limit the locations of government facilitated or mandated affordably priced housing units to Urban Service Areas. [Rationale: Based on the ongoing trend to locate affordable housing developments in agricultural areas that lack basic infrastructure; thereby shifting the infrastructure development, maintenance, and service costs to populations that can least afford it. See also General Plan 9.3 (x).] **(Comments; This implies that AH projects are discouraged in rural areas. A provision must be made to allow AH projects in rural communities that support housing goals for agricultural workers and the ability for local residents to live near their families.)**

337. Encourage use permits for innovative and experimental housing types to address homelessness, temporary, **(add; “farm worker housing”)** and transitional housing located close to services, job centers, transit hubs.

Action Steps (p. 85 - 86)

Zoning. Add a step to consider changes to or additional zoning categories in some areas to more readily accommodate affordable housing.

Rationale: North Kohala needs additional zoning categories close to the highway and the towns of Hawi and Kapaau (where the NKCDP directs growth). For example, any land currently zoned AG, but sited close to the highway and/or existing neighborhoods should be re-zoned residential, or in some cases commercial.

Wastewater. Add a step to consider more flexible wastewater treatment in high density housing.

Rationale: Until recently everyone relied on cesspools. Now septic systems have become mandatory. There is almost no flexibility with respect to high density or multi-family housing, however. Separating human waste (blackwater) from graywater in higher density housing

situations, and routing the former through a septic system with leach field, while sending all other liquid through a household grease trap followed by cesspools presents little or no risk to groundwater. Modern toilets use very little water. Hence, many units would be able to share a single septic/leach field system while having each unit utilize its own cesspool for regular wastewater.

Power, Viewplanes and Erosion Control Group (infrastructure) of the NKCDP

- **Telecomm/Broadband:** (p. 66 - 69).

EXPANDING TELECOMMUNICATION ACCESS (p. 66 - 70).

We support the Policies and Action steps. Many areas in North Kohala are beyond DSL and cable. We need to extend optical and wires much further. Consider adding an Action step on seeking federal grants to extend broadband to rural areas in Hawai'i. Federal money had been earmarked.

- **Energy:** p. 70 - 74.

STRENGTHENING ENERGY DIVERSITY & CONSERVATION (p. 70 - 74).

Policy p. 72 #255 and Action 2.128 seem weak. Add lines to improve infrastructure and smart grid.

Rationale. The State has a directive to go 100% renewable by 2050, yet our grid is not only quite old, but incapable of handling the types of technologies needed to do this.

- **Viewplanes:** p. 20 #28, p. 53 (167), p. 69 #243, and particularly p. 114 - 117 & 119, 122, 130, 142 - 145.

We support the Policies and Action steps. We'd like to see many future utilities underground rather on poles.

Strengthen Action step 4.98 to implement a viewing area makai near the end of the Akoni Pule Highway (toward or at Akoakoa Point).

- **Erosion Control:** p. 20 #28e, p. 21 (29), p. 29 (1.34), p. 43 (130), p. 53 (163), p. 55 (2.71), p. 106 (4.57), p. 144 (5.44), p. 149 (5.55).

We support the Policies and Action steps.

Agriculture Group

PRIORITIZING AGRICULTURE & FOOD SECURITY (p. 78 - 83)

The Agriculture Group agrees with and supports all of the Goals, Policies and Actions regarding Agriculture in the Draft General Plan. We do have a few specific comments, however. We'd like to see more Policies and Actions directed toward supporting small local farmers. So much of this section is directed toward industry, ag. parks, etc.

SUSTAINABILITY OBJECTIVE: Increase total acres of active food production (p. 81 - 82).

Might it be possible to explore/support a program of low-interest or interest-free loans for small farmers?

In Policy 324 p. 82 remove the "industry" part of agriculture and let it extend to individual farmers.

Add a line to support agricultural education programs at all school levels.

In Action steps on p. 83

Add a line to enhance DOA agricultural inspection at airports and harbors. Right now, inspection of incoming items lags far behind exports.

Add a line to support affordable agriculture in the form of agricultural communities or other ways to have affordable housing on agricultural lands.

Rationale. Hawaii is an island where many potential farmers cannot afford to purchase land and homes. Nakahili is an example of an innovative proposal to create Agricultural Communities whereby affordable houses and/or apartments are built on agricultural lands, offering families a place to live and space to tend crops on a cooperative basis. We need more such communities and the Plan should encourage variances or exemptions from the Code to allow experiments.

We also have some suggestions and comments on issues not associated with any of our Groups:

- **Invasive species.**

PROTECTING NATIVE HABITATS & WILDLIFE p. 15 - 19.

We applaud Policy #17 (p. 17) in particular, but Action Steps 1.1 - 1.3 address only County-owned or managed lands. Likewise, Agency Action 33.22 on p. 80 addresses only impacts on commercial agriculture. Both should extend to private land assistance. County vehicles have spread many of these species from vehicle yards in Hilo. There should be an action step to treat such vehicles.

Rationale: Coqui Frogs and Little Fire Ants are impacting many areas on the Big Island quite severely. In North Kohala they are invading mostly private yards. The County must address this and do more to combat their spread and impact.

- **Hazard Mitigation.** p. 17 - 33.

Hurricanes are only mentioned on p. 33. The Plan seems weak in general on hurricane preparedness.

Rationale: Most predictions of global climate change suggest more frequent and stronger storms, particularly during El Niño periods when the central Pacific is warmer.

- **Land Use Planning.** Section 5.

ENSURING LAND USE COMPATIBILITY - POLICY p. 119 - 121.

Policy #464 p. 120 should include CDPs directly (not just as “regional plans”)

Rationale: In keeping with the tight integration of the General Plan with CDPs they should be addressed specifically.

- **Budgeting for Implementation.** p. 160 -161.

CAPITAL IMPROVEMENT PROGRAM p. 160 161.

Policy c) 7) p. 160 should specifically include CDP Action Committees in the community review.

Rationale: Community review of proposed CIP programs is important, but most community outreach and organization is managed by the CDP Action Committees. Both should be mentioned.

The North Kohala *ad hoc* committee appreciates the attention of the Planning Department in this matter and we hope our comments on the Draft 2040 General Plan prove helpful as you continue to shape the Plan to meet the needs of Big Island residents.