

Mori, Ashley

From: Botelho-Kaili, Dorthi
Sent: Thursday, October 31, 2019 4:59 PM
To: Mercado, Keiko; Morrison, Bethany; Planning Internet Mail
Cc: Richards, Tim
Subject: Councilman Herbert "Tim" Richards III - Comments on General Plan 2040 - August 2019 Draft
Attachments: TO YEE - TRICHARDS COMMENTS TO AUGUST 2019 DRAFT GENERAL PLANS.10312019.pdf
Importance: High

Aloha,

Attached please find correspondence from Councilman Herbert M. Tim Richards, III with his comments on the General Plan 2040 – August 2019 Draft. In the event you are unable to open the attached, please contact me directly immediately. If possible, a reply would be appreciated to acknowledge your receipt.

Mahalo and Aloha,

Dorthi "Dot" Botelho-Kaili

Legislative Assistant to

Tim Richards, Councilman District 9

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Chair: Committee on Agriculture,
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HERBERT M. "TIM" RICHARDS, III
HAWAII COUNTY COUNCIL
District 9

25 Aupuni Street, Ste. 1402, Hilo, Hawai'i 96720

October 31, 2019

Mr. Michael Yee, Director
Department of Planning
101 Pauahi Street, Suite 3
Hilo, Hawai'i 96720

SUBJECT: COMMENTS ON THE GENERAL PLAN 2040 AUGUST 2019 DRAFT

Aloha, Mr. Yee:

I appreciate the opportunity to provide comments on the *County of Hawai'i General Plan 2040 August 2019 Draft (Draft General Plan 2040)*.

As you know I represent the Hawai'i County Council District 9 which encompasses North and South Kohala. I am Chair of Committee on Agriculture, Water, Energy and Environmental Management, and Vice Chair of Committee on Finance. I was born and raised in North Kohala and grew up working on my family's Kahua Ranch. I am also a veterinarian and have been involved with ranching and farming in my district for my entire professional career. I know the lands of my district well, and I know the areas that are productive agricultural lands and the areas that are not productive agricultural lands.

Based on my knowledge and experience, I believe that many of the lands in my district designated on the *Draft General Plan 2040 Future Land Use Map* as "*Productive Agricultural Lands*" are not, in fact, productive agricultural lands. The same is true of many of the lands designated on the *General Plan 2005 LUPAG Map* as "*Important Agricultural Lands*." You may recall on previous conversations that Mr. Jeff Darrow and I specifically discussed this point.

From comparison of the *Draft General Plan 2040 Future Land Use Map* with the *General Plan 2005 LUPAG Map* it appears that much of the “Important Agricultural Lands” area from the 2005 LUPAG Map was just carried over to the *Draft Future Land Use Map* and the designation name changed to “*Productive Agricultural Lands*.” I note that the *General Plan 1989 LUPGA map* used the designation of “Intensive Agricultural” for much of these same lands.

While in the past many of these lands may have been part of historic ranches or supported grazing, today, with changing ranching production and practices, many of these lands are no longer supporting significant ranching or agricultural use and would I not consider all of these lands “Productive Agricultural Lands” for crops or other agricultural uses.

Moreover, I do not believe the criteria used in the *Draft General Plan 2040* for the “*Productive Agricultural Lands*” designation support such a designation for all lands designated “*Productive Agricultural Lands*”. Interestingly, the *General Plan 2005* used the same criteria to designate land as “Important Agricultural Lands.” Because of this, I question if analysis was done as part of the land use mapping and designation process to support designating the land per the criteria. On the webpage for the *Draft General Plan 2040* I did not see reports, analysis, or GIS data supporting the “*Productive Agricultural Lands*” criteria and thus the designation for “*Productive Agricultural Lands*.”

It appears that the criteria were simply copied from the *General Plan 2005* and pasted in the *Draft General Plan 2040* with little or no analysis regarding the actual land characteristics meeting the criteria. Specifically, in the *Draft General Plan 2040* I am referring to the following criteria for “*Productive Agricultural Lands*”:

Productive Agricultural Lands: *Productive agricultural lands are those with better potential for sustained high agricultural yields because of soil type, climate, topography, or other factors (5-acre minimum lot size).*

Productive agricultural lands were determined by including the following lands [emphasis added]:

- *Lands identified as “Important Agricultural Lands” on the 2005 General Plan Land Use Pattern Allocation Guide maps.*
- *Lands identified in the Agricultural Lands of Importance to the State of Hawaii (ALISH) classification system as “Prime” or “Unique”.*
- *Lands classified by the Land Study Bureau’s Soil Survey Report as Class B “Good” soils. (There are no Class A lands on the Island of Hawai‘i)*
- *Lands classified as at least “fair” for two or more crops, on an irrigated basis, by the USDA Natural Resource Conservation Service’s study of suitability for various crops.*

- *In North and South Kona, the “coffee belt”, a continuous band defined by elevation, according to input from area farmers.*
- *State agricultural parks.*

In my district I am aware of areas designated “Productive Agricultural” that do not meet these criteria except that they had have been identified as “Important Agricultural Lands” on the *General Plan 2005 LUPAG* maps. In particular, I am aware that the lands for the proposed Nakahili Workforce Family Agricultural Community (near the intersection of Māmalahoa Highway with Waikoloa Road) do not meet the above criteria:

- The lands are identified in the ALISH classification system as “Other” (not “Prime” or “Unique”)
- The Land Study Bureau’s Soil Survey Report classifies the soils of the lands soils as Class D “Poor” soils (not Class B “Good” soils)
- The USDA Natural Resource Conservation Service classifies approximately 96 percent of the soils as within Waikaloa-Pu‘u Pa complex and the USDA’s Farmland Classification of the lands is “Not prime farmland”
- The lands are not in North and South Kona and is not in the “coffee belt”
- The lands are not a State agricultural park.

While I have not done a comprehensive analysis of other lands in my district designated “Productive Agricultural Lands” on the *Draft General Plan 2040 Future Land Use Map*, I would like to see better analysis for this designation before the *General Plan 2040* is finalized.

I raise these concerns about the land use designations on *General Plan 2040 Future Land Use Map* because I am also a strong advocate for the working families in my district and beyond, who are striving to afford Hawai‘i’s high cost of living, including high housing costs. Our working families are struggling with housing availability and cost—and this holds for both rental and for-sale homes.

My concerns about housing availability and cost arise from the results of several projections and studies regarding population growth and housing needs:

- *Population continues to grow:* The number of people residing in South Kohala has increased faster than for the County as a whole. Average annual growth in South Kohala is estimated at 3.0% between 2000 and 2010, and 1.8% between 2010 and 2018, compared to 2.2% and 1.3% for the County in the respective periods. South Kohala’s more rapid growth is attributed to its jobs base and accessibility to additional opportunities in the North Kona District immediately to the south.
- *Housing demand continues to surpass housing supply:* Population growth and household formation mean more housing supply is needed, but the backlog for primary

resident-oriented housing in Hawai‘i County remains formidable. A 2015 DBEDT study forecasted the need for 19,600 to 20,100 additional homes by 2025. We should be adding some 1,600 to 2,000 new primary residential homes per year to meet need. In contrast, private residential permitting for Hawai‘i County averaged only 784 units per year between 2015 and 2017.

- *Short supply leads to crowding and less attainable prices:* Even when homes are available, they are often not affordable to working people and average households, and 17% of households in North Hawai‘i (including North and South Kohala and Hāmākua) are crowded and/or doubled-up. Median home values are notably higher in South Kohala (about \$480,000) and North Hawai‘i (about \$434,000) than for the County as a whole (about \$335,000).

The *Draft General Plan 2040* supports these points in the *Summary of Key Findings* section with subsections such as:

- Roughly 50% growth by 2040.
- Housing is a burden for more than 50% of households.
- Housing remains unaffordable
- Households remain overcrowded

There are many positive policies in the *General Plan 2040* supporting the provision of providing equitable and safe housing for all, but I believe that these policies are not fully supported by the *Future Land Use Map*. The housing and land use policies should support flexibility from the *Future Land Use Map* designations for worthy affordable and workforce housing projects regardless of *Future Land Use Map* designations. Some of these projects may only be viable on lands outside the Urban Growth Boundaries due to landownership, land acquisition costs (e.g. non-urban designated lands are often available to developers at lower costs). Especially in the cases where developers are stepping up to provide all infrastructure (water, wastewater, etc.), these projects deserve consideration on their merits and should not be outright refused solely on the *Future Land Use Map* designations, which cannot foreseeably anticipate all land use needs for housing over the next 20 years.

In a recent “listening” session on the General Plan Update at the Waimea Community Association monthly meeting, Ms. April Surprenant made the statement (paraphrasing) that “Hawai‘i County has enough appropriate zoning to allowing building homes to address our needs for the next 100 years”. When I pressed this issue, she did acknowledge that affordability of the land thus affordable housing construction would be problematic. A categorical statement of Hawai‘i County having a plethora of land availability conducive to affordable housing construction is misleading. We have to do better.

I would like to see explicit polices in the *General Plan 2040* that provide the Council with the authority to approve worthwhile workforce housing projects outside of the established Urban designation and Urban Growth Boundary areas, particularly on non-productive agricultural land. As an example, the *General Plan 1989* had a “floating zone” concept related to locating industrial and resort retreat areas outside of the standard LUPAG map designations. Such a “floating zone” concept for resident workforce housing could be implemented in the *General Plan 2040* to enable workforce housing in areas outside of Urban designation and Urban Growth Boundary areas to take advantage of changes in population, housing preferences and types, new concepts and trends, economic influences, and other situations.

We are in a housing crisis and we need the flexibility to designate more areas for housing. Many undeveloped areas within Urban designation and Urban Growth Boundary areas are not being developed for housing. There may be many reasons for this—the high land cost, individual developer or landowner financing or economic viability, infrastructure needs, the County of Hawai‘i’s procurement process, etc. If private developers have the wherewithal, and the ability to develop viable housing in areas outside of Urban designation and Urban Growth Boundary areas, the *General Plan 2040* should have policies that are supportive of these initiatives provided there is Council review and oversight.

I would be happy to meet with you and your staff to discuss any of the matters raised in this letter in further detail and to work with you or your staff in drafting polices for inclusion in the *Draft General Plan 2040*. Please feel free to call [REDACTED] or email (tim.richards@hawaiiicounty.gov).

Aloha,

A handwritten signature in black ink, appearing to read 'Herb M. Richards III', with a stylized flourish at the end.

HERBERT M. “TIM” RICHARDS, III