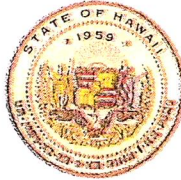
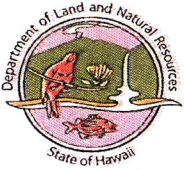


DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

October 8, 2019

2019 OCT 9 AM 8 09
PLANNING DEPARTMENT
COUNTY OF HAWAII

County of Hawaii
Planning Department
Attn: Mr. Michael Yee, Director
101 Pauahi Street, Suite 3
Hilo, Hawaii 96720

via email: planning@hawaiiicounty.gov

Dear Mr. Yee:

SUBJECT: Review of the County of Hawaii Draft **General Plan 2040**

Thank you for the opportunity to review and comment on the subject matter. In addition to our previous comments dated October 2 and 3, 2019, enclosed are comments from the Office of Conservation and Coastal Lands on the subject matter. Should you have any questions, please feel free to contact Darlene Nakamura at (808) 587-0417 or email: darlene.k.nakamura@hawaii.gov. Thank you.

Sincerely,

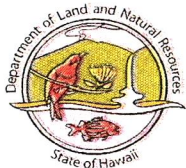
A handwritten signature in black ink, appearing to read "Russell Y. Tsuji".

Russell Y. Tsuji
Land Administrator

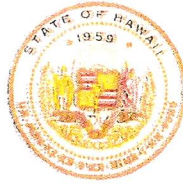
Enclosures
cc: Central Files

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DAVID Y. IGE
GOVERNOR OF HAWAII



2019 OCT -4 AM 10:35



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
Office of Conservation and Coastal Lands
POST OFFICE BOX 621
HONOLULU, HAWAII 96809

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA
FIRST DEPUTY

M. KALEO MANUEL
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

REF:OCCL:SH

Corr. HA-20-46

TO: Mr. Russell Y. Tsuji, Land Administrator

OCT - 3 2019

FROM: *for* Samuel J. Lemmo, Administrator
Office of Conservation and Coastal Lands

SUBJECT: RE: Review of the County of Hawaii Draft General Plan 2040

The Department of Land and Natural Resources (DLNR) Office of Conservation and Coastal Lands (OCCL) has received your August 21, 2019 letter inviting our office to review and comment on the County of Hawaii Draft General Plan 2040. The plan represents the County's long-range policy for the comprehensive physical, economic, environmental, and sociocultural wellbeing of the county.

We appreciate the opportunity to provide comments and offer the following feedback:

- Overall, the Draft General Plan is well put together and includes many innovative and foresighted planning elements especially with regard to climate change and sea-level rise related concerns.
- Policy 3 (page 16): We suggest specifically including coastal environments, such as beaches and dunes, to the list of natural and cultural resources considered sensitive and therefore inventoried with identified mitigation measures.
- Policy 14 (page 18): We suggest that coastal ecosystems are listed as one of the shifting native habitats impacted by climate change, since they too would benefit from establishment of a conservation buffer.
- Policy 25 (page 20): We suggest that implementation of education programs and actions to prohibit the destruction of, and work toward the recovery of, monk seals, whales, and marine turtles, as well as their natural habitat include information regarding beach loss, as well as how sea-level rise, increased storm intensity, and land use practices contribute to observed losses.
- Policy 27 (page 20): We suggest that shoreline setback policies be evaluated and potentially amended such that they include consideration of increased rates of sea-level rise observed on the Big Island relative to rates observed among the neighbor islands.

- Policy 28f (page 20): We would suggest that if redevelopment of waterfront commercial structures is allowed, that the design of redevelopment consider sea-level rise such that the design includes adaptation measures to mitigate damages from coastal hazards. Also, we recommend removing or relocating the following statement, “*d) Protect structures from the effects of long-term sea level rise*”, as it doesn’t seem appropriate to this section. The practice of protecting structures is typically at odds with protecting coastal (beach) resources due to our history of allowing shoreline hardening that has led to extensive beach loss statewide.
- Policy 29 (page 21): We suggest adding *rock revetments* to this policy and striking the word *vertical*. Sloping rock revetments can have similar negative impacts on beaches as vertical bulkheads and seawalls.
- Action 1.10 (page 21): The stated action is to “*[i]mplement education programs and actions to prohibit the destruction of, and work toward the recovery of, monk seals, whales, and marine turtles, as well as their natural habitats.*” We suggest that this section specifically identifies beaches as one of the natural habitats considered.
- Regarding actions to protect coastal areas (page 21) we find it concerning that this section only includes a single action, which is to implement education programs. We suggest that the actions to protect coastal areas be considered similarly to that of wetlands (page 22-23). Beaches and other coastal landforms serve multiple roles (i.e., ecosystems, erodible buffers that protect backshore infrastructure, public recreational and cultural resources). We suggest that actions to protect coastal areas include development of a beach management program, development of a beach evaluation procedure, and identification of potential coastline restoration sites and high-quality coastal sites for possible future acquisition by the County, State and/or private non-profit conservation organizations.
- Policy 37 (page 22): We recommend requiring a minimum setback of 50 feet from projected location of coastal wetlands based on 3.2-foot Sea Level Rise Exposure Area. These projections are available on Hawaii Sea Level Rise Viewer.
- Regarding policy and action to initiate an inventory of soil, mineral and unique geologic resources (page 25-26), we would suggest prohibiting resource extraction of sand from beaches in part by conducting outreach to inform residents and visitors about the prohibitions. Such prohibitions would include taking of sand for use in sandbags as part of storm events.
- Policy 63 (page 27) states the goal to “[r]educe developments in identified high risk hazard areas”. It is not clear from this statement if “developments” refers to new or existing development. If referring to new development, we would suggest amending this statement to prohibit development in identified high risk hazard areas. If this is not a viable option, we would suggest requiring a disclaimer by landowners stating their awareness of potential threats and how they intend to manage the respective threats.

- Policy 64 (page 28): We suggest that drainage and flood studies specifically consider multiple sources of sea-level rise induced flooding (i.e., wave over-wash, erosion, direct passive flooding, storm-drain backflow, groundwater inundation, etc.).
- Policy 65 (page 28): We suggest that drainage standards incorporate consideration of increasing frequencies in levels of storm intensity (i.e., 10-year storms, 100-year storms).
- Policy 86 (page 31): We recommend specifying the Coastal High Hazard Area with required hazard disclosures, such as, *"Require hazard disclosures in all real estate conveyance transactions including if the property is located in the Coastal High Hazard Area."*
- Mitigating & Adapting to Hazards & Climate Change, Climate Change Sustainability Objective (page 34): The sustainability objective is to, *"[p]artner with community stewardship groups, local stakeholders and intergovernmental agencies to reduce island-wide greenhouse gas emissions (GHGs) by at least 80 percent from 2005 levels by 2050."* We recommend that the County adopt objectives of 100% renewable power consumption and carbon neutrality (less emissions than offsets) by 2045 to be consistent with State objectives. See: climate.hawaii.gov/hi-goals
- Improving Transportation Systems, Transportation Planning & Financing, Sustainability Objective (page 52): The sustainability objective is to, *"[r]educe individual vehicle miles traveled (VMT) by 3% by facilitating walking, bicycling, and other energy-efficient and safe alternative modes of transportation."* We recommend that the County adopt an objective of more the 3% reduction in VMT and assign a target date.
- Regarding policy considering transportation planning and financing (page 52 – 54), we suggest including language that reduces the disturbance of coastal processes by limiting existing development and prohibiting new development within coastal setback areas.
- Action 4.24 (page 96): We suggest prohibiting the siting of future cemeteries within the Coastal High Hazard Areas and perhaps more extreme projections of sea-level rise (i.e., 10 ft).
- Section 5: Land Use Planning Goals #5a (page 119): The stated goal is to, *"Direct growth and increase density towards urban and village centers."* We support this goal as it is consistent with creating walkable, sustainable towns. However, the county should consider limiting or restricting growth within any portions of urban and village centers within the Coastal High Hazard Area, particularly the 3.2-foot Sea Level Rise Exposure Area (SLR-XA) and perhaps 6 feet for any critical infrastructure planned to accommodate growth and increased density.
- Policy 487 (page 115): Future Urban Growth Areas should also be directed away from the Coastal High Hazard Area.

- Protecting the Special Management Area, Actions (page 144-145): We recommend that the County consider updating the Special Management Area so its landward boundary is at least as far landward as the Coastal High Hazard Area, island-wide (if it's not already).
- Revisions from the 2005 General Plan Lupag (page 151): We recommend that further revisions to the Land Use Pattern Allocation Guide specifically *minimize new coastal development within the Coastal High Hazard Area*.
- Policy 600 (page 153): We recommend that the Future Land Use Map be reviewed against the 3.2-foot Sea Level Rise Exposure Area and/or Coastal High Hazard Area.
- Draft General Plan Future Land Use Maps: We recommend that these maps also show the Coastal High Hazard Area.

Should you have any questions on the matter, please feel free to contact Shellie Habel, Hawaii Sea Grant Extension Agent in the DLNR Office of Conservation and Coastal Lands at (808) 587-0049 or via email at Shellie.L.Habel@Hawaii.gov.

CC: COUNTY OF HAWAII PLANNING