

Mori, Ashley

From: Nakamura, Darlene K <darlene.k.nakamura@hawaii.gov>
Sent: Thursday, October 03, 2019 8:25 AM
To: Planning Internet Mail
Subject: FW: Request for Comments - County of Hawaii Draft General Plan 2040
Attachments: General Plan 2040 10.03.19.pdf

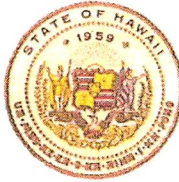
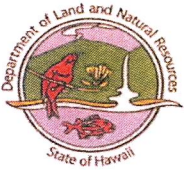
Attached are additional comments from DLNR's Division of Aquatic Resources and Commission on Water Resource Management on the subject project.

From: Nakamura, Darlene K
Sent: Wednesday, October 2, 2019 11:43 AM
To: planning@hawaiicounty.gov
Subject: Request for Comments - County of Hawaii Draft General Plan 2040

Attached are comments from the Hawaii Department of Land and Natural Resources to the above-entitled subject project.

2019 OCT 7 AM 8 25
PLANNING DEPARTMENT
COUNTY OF HAWAII

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 3, 2019

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

via email: planning@hawaiicounty.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, 2019, enclosed are comments from the (a) Division of Aquatic Resources, and (b) Commission on Water Resource Management 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 blue ink, appearing to be "Russell Y. Tsuji", is written over a horizontal line.

Russell Y. Tsuji
Land Administrator

Enclosures
cc: Central Files

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

August 21, 2019

MEMORANDUM

TO:

DLNR Agencies:

- ☒ Div. of Aquatic Resources
- ☐ Div. of Boating & Ocean Recreation
- ☐ Engineering Division
- ☐ Div. of Forestry & Wildlife
- ☐ Div. of State Parks
- ☐ Commission on Water Resource Management
- ☐ Office of Conservation & Coastal Lands
- ☐ Land Division – Hawaii District
- ☐ Historic Preservation

FROM: Russell Y. Tsuji, Land Administrator
SUBJECT: Review of the County of Hawaii Draft **General Plan 2040**
LOCATION: Island of Hawaii
APPLICANT: County of Hawaii Planning Department

Transmitted for your review and comment is information on the above-referenced subject matter. Please submit comments by **September 26, 2019**.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Darlene Nakamura at 587-0417 or by email at darlene.k.nakamura@hawaii.gov. Thank you.

- ☐ We have no objections.
- ☐ We have no comments.
- ☒ Comments are attached.

Signed: _____

Print Name: Brian Neilson - DAR Administrator

Date: 9/26/19

Attachments
cc: Central Files

RECEIVED

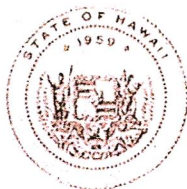
AUG 21 2019

Division of Aquatic Resources

DAR 6000

RECEIVED
LAND DIVISION
2019 OCT -2 AM 10:42
DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

DAVID Y. IGE
GOVERNOR
HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF AQUATIC RESOURCES
1151 PUNCHBOWL STREET, ROOM 330
HONOLULU, HAWAII 96813

Date: 9/26/2019

DAR # 6000

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

ROBERT K. MASUDA
CHAIRPERSON

M. KALEO MANUEL
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
RECREATION AND ANCHORAGE
BUREAU OF CONSERVATION
COMMISSION ON NATURAL RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES DEVELOPMENT
FISH AND WILDLIFE
HONOLULU, HAWAII
KAWAII AND OTHER RESERVE COMMISSION
LAND
STATE PARKS

MEMORANDUM

TO: Brian J. Neilson
DAR Administrator

FROM: Troy Sakihara, Aquatic Biologist

SUBJECT: Review of the County of Hawaii General Plan 2040

Request Submitted by: Russell Y. Tsuji, Administrator, Land Division

Hawaii Island

Location of Project: _____

Brief Description of Project:

The County of Hawaii Planning Department is requesting a review of their draft General Plan. The Hawaii County General Plan a 25-year long-range policy aiming for comprehensive physical, economic, environmental, and sociocultural wellbeing for the County. This plan is to establish County policy and provide utility towards implementing proactive actions for planning, public improvements, zoning, subdivision, and overall County services for the public. Further, the General Plan lays a groundwork that fosters inter-department, State, Federal, NGO and community collaboration.

Comments:

☐ No Comments ☒ Comments Attached

Thank you for providing DAR the opportunity to review and comment on the proposed project. Should there be any changes to the project plan, DAR requests the opportunity to review and comment on those changes.

Comments Approved: _____

Brian J. Neilson
DAR Administrator

Date: 9/26/19

DAR# 6000

Comments

Below is a list comments specific to items in the General Plan pertinent to and of interest to the Division of Aquatic Resources (DAR).

Page 16, Policy 3 and 4: Please consider including freshwater streams and estuarine habitats (e.g., stream mouths, inshore brackish water habitats with groundwater discharge) to the list of sensitive natural resources.

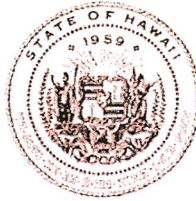
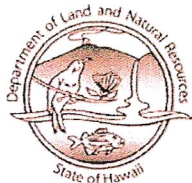
Page 18, Policy 14: Consider including conservation buffers for shifting anchialine habitats impacted by climate change and sea level rise as this is already occurring.

Page 22, Action 1.11: Is this proposed anchialine pools management program to be initiated by and intended for Hawaii County only? This should be in collaboration with DAR and statewide efforts for anchialine pool management.

Glossary: We suggest including a definition of "anchialine habitat"

General comment: We suggest changing the use of the term "anchialine pond" to "anchialine habitat" to more generally describe such habitats. This includes caves, fissures, lava tubes, and subterranean areas that have anchialine characteristics and harbor such species.

DAVID Y. IGE
GOVERNOR OF
HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF AQUATIC RESOURCES
1151 PUNCHBOWL STREET, ROOM 330
HONOLULU, HAWAII 96813

Date: 9/26/2019

DAR # 6000

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
FISH AND WILDLIFE
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAIKOOE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

MEMORANDUM

TO: Brian J. Neilson
DAR Administrator

FROM: Nicole Sanderlin NS, Aquatic Biologist

SUBJECT: Review of the Draft General Plan

Request Submitted by: Michael Yee

Hawai'i County

Location of Project: _____

Brief Description of Project:

The General Plan is the County's long-range policy for the comprehensive physical, economic, environmental, and sociocultural wellbeing of the county. As such, it focuses on a County-wide scale, using a 25-year planning horizon. It both establishes County policy and prioritizes implementation actions, needed to achieve the long-term goals. And it's important because all public improvements, zoning and subdivision must be consistent with the General Plan.

Comments:

☐ No Comments ☒ Comments Attached

Thank you for providing DAR the opportunity to review and comment on the proposed project. Should there be any changes to the project plan, DAR requests the opportunity to review and comment on those changes.

Comments Approved: Brian J. Neilson

Brian J. Neilson
DAR Administrator

Date: 9/26/19

DAR# 6000

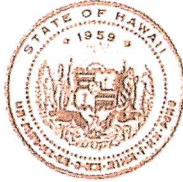
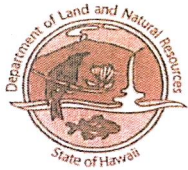
Comments

The Division of Aquatic Resources West Hawai'i office is supportive of the goals of the Hawai'i County General Plan, including: increasing native habitat restoration on County owned or managed land; increasing percentage of forest and woodland cover, measure coastal habitat to track potential habitat gains/losses and study the effectiveness of mitigation measures; increasing protections and restoration of wetland habitats; reducing impaired inland and marine waters; reducing vulnerability to sea level rise for all vulnerable communities and infrastructure; and partnering with community stewardship groups, local stakeholders, and intergovernmental agencies to reduce island-wide greenhouse gas emissions by at least 80 percent from 2005 levels by 2050.

Specifically, the West Hawai'i office is supportive of development not disturbing anchialine pools, and shoreline setback areas; protecting and providing for restoration of significant cultural features and ecologically sensitive lands, including shoreline and coastal communities/areas, wetlands, and fishponds; as well as maintaining and restore native habitat including marine, wetland, shoreline, and native upland systems on County owned or managed lands. In addition, Protections of mauka areas including upland forests and watersheds will further protect our coast line habitats from future run off and pollution.

These goals very much align with the Division's mission to work with the people of Hawai'i to manage, conserve and restore the state's unique aquatic resources and ecosystems for present and future generations.

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

August 21, 2019

MEMORANDUM

TO:

DLNR Agencies:

- ☒ Div. of Aquatic Resources
- ☒ Div. of Boating & Ocean Recreation
- ☒ Engineering Division
- ☒ Div. of Forestry & Wildlife
- ☒ Div. of State Parks
- ☒ Commission on Water Resource Management
- ☒ Office of Conservation & Coastal Lands
- ☒ Land Division – Hawaii District
- ☒ Historic Preservation

FROM:

Russell Y. Tsuji, Land Administrator

SUBJECT:

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

LOCATION:

Island of Hawaii

APPLICANT:

County of Hawaii Planning Department

Transmitted for your review and comment is information on the above-referenced subject matter. Please submit comments by **September 26, 2019**.

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Darlene Nakamura at 587-0417 or by email at darlene.k.nakamura@hawaii.gov. Thank you.

- () We have no objections.
- () We have no comments.
- (x) Comments are attached.

Signed: /s/ M. Kaleo Manuel

Print Name: Deputy Director

Date: September 30, 2019

Attachments

cc: Central Files

FILE ID:	RFD. 5216.8
DOC ID:	218017

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT
P.O. BOX 621
HONOLULU, HAWAII 96809

SUZANNE D. CASE
CHAIRPERSON

BRUCE S. ANDERSON, PH.D.
KAMANA BEAMER, PH.D.
MICHAEL G. BUCK
NEIL J. HANNAHS
WAYNE K. KATAYAMA
PAUL J. MEYER

M. KALEO MANUEL
DEPUTY DIRECTOR

September 30, 2019

REF: RFD.5216.8

TO: Mr. Russell Tsuji, Administrator
Land Division

FROM: M. Kaleo Manuel, Deputy Director *Kaleo Manuel*
Commission on Water Resource Management

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

FILE NO.: RFD.5216.8

TMK NO.:

Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore all water use is subject to legally protected water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the Internet at <http://dlnr.hawaii.gov/cwrm>.

Our comments related to water resources are checked off below.

- ☐ 1. We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.
- ☐ 2. We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
- ☐ 3. We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.
- ☐ 4. We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at <http://www.usgbc.org/leed>. A listing of fixtures certified by the EAP as having high water efficiency can be found at <http://www.epa.gov/watersense>.
- ☐ 5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at <http://planning.hawaii.gov/czm/initiatives/low-impact-development/>
- ☐ 6. We recommend the use of alternative water sources, wherever practicable.
- ☐ 7. We recommend participating in the Hawaii Green Business Program, that assists and recognizes businesses that strive to operate in an environmentally and socially responsible manner. The program description can be found online at <http://energy.hawaii.gov/green-business-program>.
- ☐ 8. We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawaii. These practices can be found online at http://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH_Irrigation_Consevation_BMPs.pdf.

- ☐ 9. There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.
- ☐ 10. The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit is required prior to use of water. The Water Use Permit may be conditioned on the requirement to use dual line water supply systems for new industrial and commercial developments.
- ☐ 11. A Well Construction Permit(s) is (are) are required before the commencement of any well construction work.
- ☐ 12. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.
- ☐ 13. There is (are) well(s) located on or adjacent to this project. If wells are not planned to be used and will be affected by any new construction, they must be properly abandoned and sealed. A permit for well abandonment must be obtained.
- ☐ 14. Ground-water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
- ☐ 15. A Stream Channel Alteration Permit(s) is (are) required before any alteration can be made to the bed and/or banks of a stream channel.
- ☐ 16. A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is constructed or altered.
- ☐ 17. A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water.
- ☐ 18. The planned source of water for this project has not been identified in this report. Therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources.

- ☒ OTHER: We recommend that the following sustainability objectives be expanded and additional policies and actions be included in the General Plan update to further the protection and management of the State's water resources and better integrate land and water planning:

1. Managing Streams and Watersheds (Pg. 23)

Consider expanding the sustainability objective to include protection and restoration of stream flows.

Policies to support this objective could include:

- Maintain compliance with established instream flow standards.
- Increase the efficiency of irrigation systems utilizing surface water resources.
- Replace use of surface water with alternative water sources, such as recycled water, wherever practicable.

Actions could include:

- Conduct water audits of irrigation systems utilizing surface water resources.
- Upgrade wastewater treatment facilities to produce recycled water suitable for irrigation and other non-potable needs.
- Require monthly measurement and reporting of all surface water uses to the Commission on Water Resource Management.

2. Managing Water System Resources – Drinking Water Conservation (Pg. 38)

Consider adding the following policies:

- Increase the efficiency of public water systems.
- Replace use of potable water with alternative water sources, such as recycled water, wherever practicable.

Actions could include:

- All public water systems (e.g. county and large capacity systems serving populations of 1,000 or more) shall complete annual water audits, in compliance with Act 169, SLH 2016.
- Upgrade wastewater treatment facilities to produce recycled water suitable for irrigation and other non-potable needs.

3. Managing Water System Resources – Drinking Water Quality (Pg. 40)

Consider expanding the sustainability objective to include protection of existing and potential

sources of drinking water.

Policies could include:

- High standards of water quality shall be maintained.
- Application of lower quality water over a higher quality aquifer is disallowed.

4. Managing Water System Resources – Drinking Water Prioritization (Pg. 41)

Consider adding the following policy:

- The Department of Water Supply and the Planning Department shall coordinate in the updating of the County Water Use and Development Plan every five years to set forth the allocation of water to land use.

Action could include:

- Amend County Ordinance 11-7, Section 29.3, to add that the Planning Department in coordination with the Department of Water Supply shall have the authority to propose amendments to the Water Use and Development Plan.

5. Managing Water System Resources – Recycled Water Expansion (Pg. 44)

Consider amending the sustainability objective to increase the use of alternative water supplies for irrigation and other non-potable needs.

Consider adding the following policies:

- Alternative supplies should be used wherever practicable.
- Storm water is a valuable resource that is currently underutilized.

Actions could include:

- Upgrade wastewater treatment facilities to produce recycled water suitable for irrigation and other non-potable needs.
- Expand recycled water delivery systems in areas having significant non-potable needs.
- Establish water reuse zones where hookup to recycled water delivery systems is mandatory.
- Require onsite water reclamation facilities and the installation of dual water systems for new commercial or industrial developments where practicable.

If you have any questions, please contact Lenore Ohye of the Commission staff at 587-0216.