

The 1984 Kona Community Development Plan is no longer appropriate for Hawai'i.

Reflecting upon the 2 TMKs near me, once zoned Ag that are targeted for a dense development, I see that so many parts of the development puzzle have been inadequately addressed for these parcels:

Reasons to oppose the outmoded 1984 KCDP:

- The Action Committee review of the 1984 Kona Community Development Plan must be successful in identifying the areas of the County infrastructure and the available County resources which need upgrades or supplementation.
- Next, the County of Hawaii must commit to completing these upgrades before the County of Hawaii Planning Commission can approve ANY additional developments.
- Otherwise, the quality of life for the residents of the County of Hawaii will be further degraded.

As former Mayor Harry Kim noted in his response to the Kona Three LLC Environmental Assessment in 2021, this extensive review of the 4 decade-old KCDP would need to be completed

- Before the County could approve a 450 unit multi-family residential housing project that
- Would dump a minimum of (2 vehicles x 450 units) 900 vehicles twice a day into the Queen K/ Kuakini Highway interchange via Lako Street

- Despite what the developer's consultant from Stantec suggested, the available public transportation with its route on Alii is an unlikely and un-workable alternative to private vehicle use.
- Destruction of walkability/safety of Kona Vistas streets. People of all ages currently walk, push strollers, run, exercise pets, play ball and socialize here as well as do those who park on Lako to utilize the Walua Trail on a daily basis.
- This lower section of Lako is also a school-bus stop.

Traffic Impact - Community

- Cumulative traffic impact of yet another subdivision in the local area is unbearable.
- Multiple high-end housing projects along Ali'i Drive are both proposed and in development, and a 150+ room boutique luxury hotel is proposed at Keauhou Bay.
- Traffic study of Ali'i Drive was done during COVID-19 restrictions, when Ironman was canceled, schools were remote, and tourism was limited. The numbers are meaningless.

Rainwater/Drainage Issues Exist Already

- Because of the siting of Royal Vistas on the leeward flank of Hualalai's "shield" configuration, well-defined drainage features are lacking, as noted under the **FLOOD HAZARD** section on p3-1 of the **Grey Infrastructure Report** in the **Kona Community Development Plan**. , will cause additional episodes of flooding and road wash-out as noted in the runoff and pollution, harming coral reefs and damaging the ocean.
- Horseshoe Bend and the Holualoa Stream on the parcels are listed in the second paragraph of 3.1.1, (under the heading **North Kona Flood Hazard Analysis**), as two of the seven intermittent drainage ways studied by the North Kona Flood Plain Management Study (1984) by the US Soil Conservation Service (presently Natural

- Do developers pay a "per hook-up" rate commensurate with the actual costs of the increase in water service customers or are short-falls just passed along to existing customers?

Drought

- Kona and all Hawai'i faces current and predicted increasing drought conditions; climate change causes greater weather uncertainty, increasing drought risk.

Waste Water Treatment and Sewage

Capacity issues at the Kealahou Sewage Treatment plant must be resolved before the population expands further.

- The Developer had expressed his plan to connect to the Pualani Estates sewer system, however the Kealahou sewage treatment plant is already OVER capacity if all Kona's current homes were hooked up, as required by law.
- Therefore, the only reason there is capacity today is because all current homes are not yet connected.

Are we respecting raw land with Archaeological and Cultural Importance? :

- Multiple and significant archaeological sites and burials are located on the parcels, plus 3 Historic trails.
- Archeological sites are spread across multiple adjacent parcels. Developments such as this obliterate archaeological and cultural heritage one project at a time.
- Plan will destroy stone walls that appear to be a continuation of the Holualoa Slide descending from the Holualoa Inn property.
- Land has historical significance*, evidenced by its location in line with both the Holualoa heiau and the Kealakowa'a heiau in the Holualoa 1&2

Further Information:

- Original developer had procured extensions through 2011, though zoning should have reverted to Ag.
- Kona Three LLC became the next owner in 2015, submitting incomplete and inaccurate environmental assessments.
- Developer has exceeded time extensions multiple times while still not fully addressing 4 lane ingress and egress through Lako/Kuakini/Queen K installation, among other issues.
- Developer has not procured funding
- Developer has not commissioned the required "Market Rate Survey" to validate categorizing part of the Project as "Market Rate". He testified before the LUC that he did not have the \$40K to pay for that survey.
- Developer has requested approval for a 10 year build-out
- **Impact of Multi-Year Construction on Remote Working**
- Kona Vistas, Iolani, and Pualani Estates residents working from home will be significantly and adversely impacted in their provision of higher education, mental health, housing, sustainable energy, architecture design, fine arts, and other services to the community.
- **Impact of Multi-Year Construction on Quiet Neighborhoods will be daily and dangerous**
 - Build-out of a new subdivision will be a 10-year undertaking, including ongoing transport and use of pile drivers, bulldozers, graders, and other heavy equipment.
 - Resultant noise pollution, dust, vibration, and consequent mental and emotional stress to the neighborhood residents, including kupuna and keiki, cannot be overstated.
 - Kona Vistas, Iolani, and Pualani Estates homes were not built to withstand years of adjacent construction, especially not the "shield"- transmitted vibrations of a decade-long process.

Kona Three LLC has cited the Kona Community Development Plan (KDCP) for presumptive justification. The KDCP was a development-oriented aspirational County document created in 1984, which is currently under extensive review because of Community concerns regarding its outdated "urban expansion" plan for most of Kailua Kona, from Palamanui to Keauhou. Do we really want Kona to become another Honolulu?