

Sustainable Development and Resilient Communities – Land Use

Public Comment Summary

County of Hawai'i Draft General Plan 2045

The public comment period for the Draft General Plan 2045 was held from September 18, 2023 to April 1, 2024. This comment summary contains the key themes derived from community feedback on the Sustainable Development and Resilient Communities – Land Use section of the draft plan.

Comments related to land use primarily address concerns and suggestions regarding zoning, housing, agriculture, community engagement, sustainability, infrastructure, resource preservation, tourism, and government authority. Key points from the feedback include attention to zoning changes affecting rural areas, the need for affordable housing, preserving agricultural land, and enhancing community involvement in planning decisions. Additionally, comments support incorporating sustainable development principles, addressing infrastructure needs, and preserving natural and cultural resources amidst a growing visitor industry. Discussions regarding government decision-making authority express the need for clearer alignment with long-term community interests. Other miscellaneous themes include the need for clarifications on terminology throughout the plan, consistency in land use designations on the land use maps, attention to climate change mandates, and requests for more detailed GIS information and data representation. Overall, the feedback highlights a range of complex issues and perspectives shaping land use planning and development on Hawai'i Island.

1. Land Use and Future Development

Land Use Designations

Many comments express concerns over land use changes, particularly the shift from agricultural or low-density residential to higher density or industrial uses. There are concerns that such changes could affect the rural and agricultural character of areas, impact existing property values, or contradict existing agreements. Rezoning is seen as either a necessary step for smart growth or as potentially leading to negative environmental and community impacts. Clarification is sought on clustered developments, and some oppose the concept altogether. The importance of infrastructure in planning and how it might not currently be keeping up with development, is also noted.

Sustainable development

The push for sustainable development is at the forefront with calls for smart growth principles that focus on environmental sensitivity, sustainable agriculture, affordable housing, and efficient infrastructure. Comments emphasize the importance of careful planning that respects community character, maintains core densities, avoids sprawl, and aligns with multimodal transportation needs. However, feedback also indicates mixed views about smart growth and clustering with concerns over the potential loss of personal freedoms or community character on Hawai'i Island. The application of these principles to land use planning, especially as it pertains to high-density areas, requires further public engagement and community buy-in.

Urban expansion and access to amenities

Comments highlight the challenges of urban expansion in areas lacking wastewater infrastructure. Specific locations are mentioned where urban expansion should consider the integration of sewer facilities due to proximity to sensitive environmental areas. Other amenities such as grocery stores,

hospitals, and police presence are cited as being insufficient in certain areas. Comments express concerns over the efficient use and management of urban and recreational spaces including proposals for improved facilities, recreational areas, and mixed-use planning. There is a necessity for public amenities and accessibility, including the addition of sidewalks, bike paths, multimodal transit options, and adequate public parking to support local businesses and communities.

Preservation of agricultural land

Several comments focus on the preservation of agricultural land, challenging any encroachment from urban expansion or non-agricultural development. Commenters are wary of agricultural land being used for anything other than farming, including vacation rentals and rezone proposals that could change the landscape from farming to residential or commercial uses. There is a strong emphasis on preserving agricultural lands and supporting small-scale and local farming. Participants stress the need for fair policies that encourage farming activity, provide tax incentives for farmers, and facilitate local food production. Comments underscore the necessity to protect agriculture from urban encroachment, maintain ecosystem services, and promote agriculture-based tourism while preventing land use drift toward non-agricultural purposes.

2. Affordable Housing

Affordable housing is a key theme with comments highlighting a need for various types of affordable and workforce housing. Commenters propose prioritizing affordable housing in permitting processes and express concerns about how zoning choices can drive up housing costs. The trend toward increased density in housing, such as planned unit developments (PUDs), raises questions for some about the future of residential living and the impact of those changes on existing communities. Comments express concerns about affordable housing, inefficient regulatory processes, and the need for equitable land use policies that account for private property rights, accessibility, and clarity on definitions related to urban growth and rezoning. Participants show interest in policies supporting small-scale agriculture and preserving productive agricultural land. Some comments reflect opposition to increased density or clustering, preferring development that does not alter the rural and agricultural character of the island.

3. Community Engagement in Land Use Planning

Community character and planning are discussed in the context of keeping building requirements appropriate for the local environment, preserving resort areas facing climate impacts, maintaining community character while adapting to natural hazards, and implementing managed retreat in specific regions. The need for community input in decisions that affect the landscape and character is emphasized. Comments reflect concerns over the extent and effectiveness of community involvement in the planning process. There are general concerns regarding the overall direction in the General Plan, with commenters questioning the clarity and transparency of the policies and the extent of public engagement. They seek more information on what is defined by 'smart growth', 'stakeholders', and the involvement of private property owners in the planning process.

4. Infrastructure Considerations

Infrastructure is a consistent point of concern, including considerations for wastewater systems, energy distribution, transit, and the zoning conversions necessary to support community growth. There is a call for investment that enhances community resilience in the face of natural hazards. The

costs of underground utilities and their impact on housing affordability are also brought up, suggesting a dichotomy between the desire for modern infrastructure and maintaining affordable development. Several comments express concerns about the impacts of new development on infrastructure such as water, sewer, power, and roads. There are suggestions to require developers to improve infrastructure, such as building a water or wastewater facility before developing land. Issues mentioned include harm to ecosystems from inadequate septic systems, road capacity, increasing urban density, and the burden of new infrastructure costs being passed on to housing prices.

Transportation

Many comments address the need for improved transportation infrastructure and transportation systems including roads and multimodal trails. Participants suggest a focus on safety, durability, and the reduction of traffic congestion. Comments highlight a need for increased road capacity, integration of complete streets, ensuring safety during emergencies, and addressing parking issues.

Wastewater

Many comments discuss wastewater management and infrastructure. There are concerns about the adequacy of wastewater systems and suggestions to utilize innovative wastewater technology and partnerships with private facilities. Addressing cesspools and ensuring proper sewage facilities in case of urban expansion are also critical to commenters. Concerns about pollution of water resources due to inadequate sewage facilities are also raised. Additionally, there is mention of coordinating with the Department of Health to address individual wastewater systems and the prioritization of resources. There is also a push for maintaining or strengthening infrastructure concurrency requirements to prevent further inadequacies.

5. Natural Systems Planning and Preservation of Natural and Cultural Resources

Comments in this theme address the importance of considering environmental impacts and natural hazards in planning decisions and emphasize sustainable practices, including the use of natural systems in planning and the conservation of resources. Incorporating examples to clarify what is meant by natural systems planning may be beneficial. Comments highlight concerns about preserving scenic beauty, natural spaces, and viewsheds, advocating for more rigorous protections and planning to maintain the scenic quality of the area. There is a strong sentiment toward preserving cultural resources and natural beauty when considering development, with an emphasis on proper review processes and community input to preserve the unique cultural and environmental aspects of Hawai'i Island. The need to balance development with the impacts of climate change is also raised. Several comments call for the review of building and zoning codes in light of climate change impacts, including moving urban development away from vulnerable areas and considering urban forestry. Suggestions include updating codes and plans to retrofit existing structures against natural disasters such as tsunamis, fires, and storm surges. incorporating hazard mitigation strategies, relocating infrastructure from high-risk areas such as fire zones, and recognizing the role of non-native forestry in specific ecosystems. Additionally, they touch upon energy strategies that could include the adoption of geothermal energy and question the viability of carbon capture initiatives

Concerns are expressed about the possibility of rural and agricultural lands being repurposed for visitor accommodations or non-agricultural developments. Concerns are raised about the implications of rezoning on the natural environment and cultural sites. Views were expressed that sustainable and cultural practices should be prioritized and maintained in the face of development. Concerns related to water management and conservation, including stormwater management, reducing pollutant loads, and concerns about reuse of household water, are emphasized. Ideas include leveraging community partnerships for stormwater management and the exploration of additional water sources, like aquifers, rather than the reuse or recharge of potentially unsafe water.

Riparian corridor protection and designation

A number of comments advocate for the designation of land around the Wai'ula'ula, Waikoloa, and Keanu'i'omanō streams and tributaries as conservation, recreation, or natural areas to protect the riparian corridor. This would support managing stormwater, reducing pollution, mitigating flood and erosion impacts, creating habitats for native species, and fostering community partnerships. The streamside areas could also serve as pathways for safe and zero-emission transportation alternatives.

6. Economic Considerations

Comments underscored the need for economic diversification towards local production and job creation. Suggestions included focusing on industries such as agriculture, supporting local businesses, and enhancing mixed-use zones to stimulate economic development in line with community goals and benefits.

Visitor accommodations

There are differing opinions on the role of tourism and short-term vacation rentals, especially in agricultural and rural areas. Some advocate for restricting short-term rentals to promote local food production, while others see agritourism and eco-stays as opportunities for economic growth and supporting local farmers. There are discussions around the distribution and handling of visitor accommodation taxes. Comments indicate concerns about the pressure short-term vacation rentals (STVRs) place on housing and infrastructure, with some advocating for restricting STVRs outside designated resort areas. Commenters also emphasize the importance of sustainable practices, focusing tourism on agriculture, the wellness industry, or direct contribution to the local economy without negatively impacting the rural character. Concerns are raised about the impact of tourism and the establishments of visitor accommodations on local communities, infrastructure, and the accessibility of amenities for residents.

Comment	Page Number (in the online Konveio platform)
"Puako Mauka" Background/ Context Thank you for meeting virtually with me on Thursday 3/21 regarding the subject 552.829-acre property (referred to as "Puako Mauka", TMK: 6-8-001:022) and the General Plan 2045 (Draft Sept. 2023). As discussed, the subject lands were originally planned for an additional golf course connected to Mauna Lani Resort. Wells for irrigations were developed and the golf course was planned and permitted well over a decade ago...not certain of that date. Since the Client, TI Capital Management, LLC has owned the property, we have done some prior planning work for the property. During 2022 and last year, the planning efforts included an affordable/ workforce housing concept for approximately 60 acres of the property contiguous to Mauna Lani Resorts urban/zoned lands. We were envisioning pursuing an expedited 201H review and approval process to allow for approximately 385-500 units, with 68-75% of the units meeting the affordable/workforce housing requirements. Based on the density study we had prepared, the attached exhibit (201H Area- Puako Mauka) illustrates and summarizes a varying mix of affordable multi-family residential units (260-376) and approximately 125 market homes on lots averaging 8,500 sf. In total, the project would yield approximately 385-500 units. In addition, we have studied the potential to subdivide the balance of the agriculture zoned (A-Sa) lands under a standard subdivision or as a Planned Unit Development (PUD) to reduce the size of the lots and preserve the flood plain area of the property for more extensive agriculture. Due to the flood zone (refer to attached FIRM map), the PUD approach would be the preferred and would likely yield approximately 73 ag. lots (with farm dwellings) on smaller farm lots while preserving the flood prone area for larger scale farming. Our Client (TI Capital Management, LLC) would like to pursue the workforce housing concept and planning for the balance of the agriculture lands. In this regard, they expressed their cooperation in supporting and accommodating an emergency evacuation route from Puako Beach Lots (as noted in the South Kohala CDP 2008 -attached exhibit) and also finding a more regional solution to the wastewater collection and treatment issue confronting the Puako Beach lots. As planned, the conceptual master plan illustrated for "Puako Mauka" would require either the expansion of the existing Mauna Lani Resort Wastewater Treatment Facility (WWTF) or development of a separate WWTF system. Whatever the most desirable solution is to solve the Puako Beach Lots wastewater problem and desired emergency evacuation route, they would consider participating in conjunction with the planning for their lands.	2
Plan erroneously marks properties makai of Paukaa Drive and Honolii place, which are urban expansion, not natural. Google Earth and County tax map keys clearly show residences between these roads and ocean. Same error probably exists with other costal properties. This was pointed out in earlier draft, but never corrected.	45
Following the above language, amend the text to include these general definitions: Transit-Oriented Development (TOD). The development of compact, mixed- use villages which would integrate housing, employment, shopping, and recreation opportunities. Villages would be designed around transit stations/ stops which would reduce the need for daily trips and financially support the expanded transit system. Source KCDP Pg. 4. 6 Village Types Defined– Transit-Oriented Developments (TODs)vs. Traditional Neighborhood Developments (TNDs). Both TODs and TNDs are compact mixed- use villages, characterized by a village center within a higher-density urban core, roughly equivalent to a 5- minute walking radius (1/ 4 mile), surrounded by a secondary mixed use, mixed- density area with an outer boundary roughly equivalent to a 10-minute walking radius from the village center (1/ 2 mile). The distinction between a TOD and TND is that the approximate location of a TOD is currently designated on the Official Kona Land Use Map (Figure 4- 7) along the trunk or secondary transit route and contains a transit station, while TND locations have not been designated and may be located off of the trunk or secondary transit route at a location approved by a rezoning action. Source KCDP Pg. 4- 28	47
This is important to ensure that proper mixed- use master planning is carried out for the area. See the recommendation from KCDP below:4 Makaeo Village (Regional Center) A major retail center	38

is planned near the Old Airport Park. As a mixed- use village, the plan is to introduce residential uses into the mix, design a complementary relationship to the Old Airport Park, and integrate a transit hub or major park and ride facility for commuters". Source KCDP Pg. 4-40	
Regarding Draft GP Map 3, it is suggested that the property that now appears as the newly proposed High Density Urban and Medium Density boundaries located mauka of the Old Airport and makai of Queen Ka' ahumanu Hwy be instead designated as a Regional Center and Neighborhood TODs as designated in the Kona CDP Official Land Use Map, Figure 4.7.	38
Land use Map 3 should indicate the TOD's that have been identified on Kona CDP figure 4-7, Pg. 4-36. See map below **ATTACHED MAP IN EPIC)****	37
Proposed amendment to table 6: Urban land use by adding TOD and TND to the list of "GP Designation: in column 1 (see above) since it is the stated intent of the General Plan (see page 46) to adopt policies to include both TODs and TNDs.	33
Add GP Designation: Transit-Oriented Development (TOD) Transit- Oriented Development Floating zone (TOD) Mixed use developments located at strategic points along a regional transit system. TODs consist of moderate and high density housing, along with completing public uses, jobs and services Traditional neighborhood development (TND) Minimum land area. The minimum land area the for a new community shall be consistent with the zoning code's requirement for project districts which corresponds to the urban and secondary core. KCDP Pg4-41 High density village design guidelines Medium density village design guidelines	33
p47. 'Rezoning that promote infill are encouraged and should be conditioned to ensure connectivity to the surrounding developments and, where applicable, to provide mixed use opportunities to make the area more pedestrian-oriented. " -Support the rezoning of land to multiple residential near places of employment, shopping facilities, educational, recreational, and cultural facilities, and public facilities and utilities. 8.10 Development of TODs and TNDs are encouraged within locations of the centers shown on the General Plan Land Use Map. These locations are approximate and become fixed during rezoning.	48
The quotes that follow, where I have emphasized those related to ZONING, force me to wonder that the present Zoning can be altered to fit this PLAN. The **quoted statement does not erase the former quotes. The most important quote is from p47. REZONING will take place! "The General Plan also provides the legal basis for all the other elements of the County's planning structure. As such, the General Plan is the highest order, or "umbrella" plan. It establishes the boundaries within which the County must operate. The planning system as illustrated below consists of a comprehensive Countywide General Plan, and includes Community Development Plans, Urban Development Plans, Special Area Plans, and Agency Functional or Strategic Plans as implementation mechanisms that carry out the goals, objectives, policies or standards, and actions of the General Plan." "Notably, "[n]o public or project, or subdivision or zoning ordinance, shall be initiated or adopted." unless the same conforms to and implements the general plan." (§3-15(c)). The Charter further states that "[z]oning, subdivision, and other ordinances shall contain the necessary provisions to carry out the purpose of the general plan."The 2045 General Plan often relies on further implementation actions, such as zoning and budget ordinances, to move Hawai'i Island in the direction of our goals. " ** "Further, it contains no authority to change previously existing subdivisions or zoning."	48
Aloha Planning Department and County Council Members- The GP website is not generating a new password for me, nor do I like the website's terms or conditions that my comments can be modified so I am writing to Long Range Planning and County Council members. (See, attached terms and conditions. (1) Change proposed GPLU map, expanding the Low-Density Urban designation at Pepeekeo Point mauka of Beach Rd.. This is inconsistent with the terms of the April 12, 2002, SETTLEMENT AGREEMENT FOR BOARD OF APPEALS AND SUBDIVISION OF CONTINENTAL PACIFIC, LLC LANDS which limited the number of lots in the Urban area to eleven lots. See, attached Settlement Agreement. There is no sewer here. (2) Change proposed GPLU map, TMKs (3)2-1-6: parcels 002 and 003. These parcels are currently in commercial uses compatible with the resort zone uses across the street. The proposed GPLU designation should	35

be changed to Resort to be consistent with the resort zoning across the street and Reed's Bay shoreline, Reed's Bay Ice Ponds, and Banyan Drive scenic area which are all listed in the 2005 General Plan Table 7-3. Natural Beauty Sites, District of South Hilo, under the public trust doctrine. (3) Change proposed GPLU map at Hu Honua Bioenergy, LLC's TMK (3)2-8-8-104, (which proposes to expand the Industrial designation). Change it back to the 2005 LUPAG and the Hamakua Community Development Plan designation, which limits the Industrial designation. The site is sloped, floods from stormwater run-on and the facility is outdated technology which will never get all of its approvals because the 21 million gallons a day of thermal wastewater heats up the marine waters in violation of the Clean Water Act (4) Change proposed GPLU map at TMK (3)2-1-1-12 (Lessor: State of Hawaii, Golf Course parcel) (which proposes to make the whole 62 acre site Urban Expansion). Change back to Open designation. This ignores climate change mandates and historic tsunami inundation maps. Change it back to Open based on tsunami maps, and rising ocean which will submerge Reed's Bay Beach Park, Liliuokalani Gardens, and Banyan Drive on East side. Plans must provide for moving these open spaces inland and rerouting Banyan Drive to make way for those recreational uses currently of high value to the community and the tourist economy. Please acknowledge this email and include my comments in your review	
KS comment: Depending on requirements and extent of buffer areas, this could make projects unfeasible and hinder development and economic stimulus to the local economy and agriculture production.	64
KS comment: Clarification is needed as to whether this policy applies only to rezoning applications or if the policy could also apply to subdivision and other permit requests for existing Resort (V) zoned areas on the makai side of Ali'i Drive.	50
KS comment: Careful consideration should be given as additional requirements could make projects unfeasible and hinder development and economic stimulus to the local economy. Each project is unique and the specifics of each project should be considered when contemplating requirements. However, some standardization and clear guidelines will help ensure fairness in implementation.	50
KS comment (Policies 6.3, 7.1, 7.6 & Action 7.b): Depending on the extent of restrictions, performance requirements, and regulations, this could make projects unfeasible, hinder development and economic stimulus to the local economy. Definition of vulnerable areas, high-risk hazard areas and high-risk zones may be subjective with potential for unfair treatment of projects; clear and standardized definitions are necessary to help ensure fairness in implementation.	30
KS comment: If this zoning category is created, an RPT code amendment is needed to incentivize landowners and defray carrying costs of managing conservation land. A lack of incentives and concessions for landowners could hinder investment and development in other areas.	29
Due to the geological makeup of the majority of Hawai'i Island, underground power utilities will increase construction costs and lessen affordability of housing in the county.	28
KS comment: KS understands the public's right to access the shoreLine and is suggesting that this policy/guideline should also consider a landowner's need to manage security to adjacent areas and protect coastal, cultural and natural resources. In addition, a more nuanced approach to public access should be developed through this process as the current requirements do not differentiate between typical developments (ie; resort, commercial, residential) and resource management and stewardship activities seeking entitlements.	50
: This policy prioritizes the rehabilitation and the optimum utilization of resort areas that are presently serviced by basic facilities and utilities before allowing new resorts. Landowners with land already zoned resort, who pay and have been paying resort property taxes, should not be disallowed from developing new resorts.	50
KS comment: This policy prioritizes the rehabilitation and the optimum utilization of resort areas that are presently serviced by basic facilities and utilities before allowing	50

KS comment (Policies 4.5, 4.6, 5.2 and 5.3): These policies broaden the Planning Department's (PD) discretionary power when reviewing discretionary permits. Without standardized rules and guidelines, certain projects could be impacted differently and unfairly relative to one another. Additional costs for added requirements could make projects unfeasible and hinder development and economic stimulus to the local economy.	28
KS Supports policy 10.5, 10.7, 10.9, and 10.10	63
KS Supports this policy	60
KS comment: This policy should help developers build more affordable housing, resulting in an increase in farming activity, lower food costs, and higher local food production.	51
KS comment (Actions 8.a and 8.e): Innovative mixed-used zoning regulations could support development activities and help the County achieve its housing, energy, food production, economic, etc. goals.	51
KS comment (Actions 4.c, 4.e and 4.f) : These policies aim to preserve agricultural land by lessening infrastructure requirements for agricultural subdivisions, lessening tax burdens for farmers, building agricultural support facilities, and transferring development rights to create density to contain development in appropriate locations for farm worker housing. The positive result should be an increase in farming activity, tax savings for farmers, lower food costs, and higher local food production.	29
•Public Access: KS supports managed, public access. We hope the County understands the need to balance the demand for public access with private landowners' needs to manage and steward their own land, including protecting against trespassing, illegal dumping and vandalism. Particularly, for KS, we take our stewardship obligations to our 'aina and beneficiaries seriously. We would like to emphasize the need to have collaborative partnerships and initiatives with the County to ensure public access is also well-managed access.	48
•Contribution to public infrastructure and public access: Would like to ensure that the contribution requirement is commensurate with the type of "development" (i.e. a cultural education site development will have lesser requirements for contribution than an industrial park or resort development).	47
3.Geographic References. Add some general geographic references on the regional Land Use Maps to assist viewers in reading the maps. In the case of South Kohala Land Use Map, suggest the coastal resort and settlement areas be noted along the coastline such as Mauna Kea Resort, Puako, Mauna Lani Resort, Waikoloa Beach Resort, and Hualalai Resort/ Kukio.	35
2.Table 8: Agriculture Land Use and Table 10: Other Land Use (page 33). Under the Optimal Residential Density (DU/AC) column of these tables, the 'Extensive Agriculture' and 'Natural' land use categories should include a notation related to the allowed residential density. Suggest adding a notation such as: "Farm dwellings allowed consistent with Agriculture zoning." This would clarify and account for the allowed farm dwellings (serve as residential units accessory to farming) that are permitted under the existing zoning.	34
B.'Extensive Agriculture' vs. 'Natural' Land Use designation. Consistent with the Agriculture Zoning (A-Sa) of the property, designate the balance of the property as 'Extensive Agriculture'. Although it was noted that the proposed 'Natural' land use designation shown in the draft map would not impact the allowable uses of the agriculture zoning, such as implementing a subdivision or PUD cluster subdivision as discussed above, the 'Extensive Agricultural' land use would be a more accurate designation of these lands.	37
Attached maps in EPIC	37
1.Revise the GP Land Use Map- South Kohala for the subject lands as follows: A.Conservation Lands. Adjust the Conservation Boundary to represent the State Land Use boundaries more accurately. Based on the State Land Use Commission's GIS mapping, the Conservation lands are shown on the attached Exhibit- SLUD. We have not had a chance to check the hard copy State Land Use maps to confirm if the GIS maps are consistent/ accurate ... but assume they are. As you	37

had noted, the County's GIS SLUD Webmap (attached) shows the Urban district extending into the property by approximately 35 acres. Regarding the Conservation boundary, the Land Use Map should reflect the Conservation boundary following the northern boundary of the property. Based on our GIS mapping, we estimated approximately 97 acres of the subject property are designated Conservation. In the County's real property tax assessment of 2019/20, they noted that 102.5 acres were Conservation. Interestingly, our Client recently noted that the Real Property Tax (RPT) Assessment has classified 35.2 acres as Residential (at least since 2019). In addition, the 2024/25 tax assessment includes the balance of the property as Agricultural (517.629 acres). In the 2019/20 assessment, the tax assessment was 35.2 acres Residential, 415.129 acres Agricultural, and 102.5 acres Conservation. I am not familiar with the RPT technology used to determine these land use classifications but interesting that the Residential designation generally aligns with your SLUD Hawaii Co. Webmap discussed above. Our Client indicated that they would pursue getting those land classifications and related real property tax assessments resolved with the County Department of Finance- Real Property Division.	
Reference maps attached, with the subject property noted, include: 1)201H Area- Puako Mauka Lands Concept Plan 2)Land Use Pattern Allocation Guide Map (LUPAG Use Map- South Kohala) 3)South Kohala CDP 2008 4)County Zoning 5)General Plan 2045 Land Use Map 6)State Land Use (SLUD) 7)State Land Use -SLUD Hawaii County Webmap 8)Flood Insurance Rate Map (FIRM)	35
I am comprehending that there is a plan to "cluster" people close together in the future development plans for Hawaii Island. Is this correct? This clustering plan I am in complete opposition to. Private Property in the countryside needs to be used for farming purposes to provide food and products for the people of Hawaii Island, the neighbor islands and the rest of the world. All communities here are in strong opposition to this agenda and you must clearly realize this. In the General Plan there is much mention of "stakeholders". Who are these stakeholders? What are their names and or entities? What do these stakeholders have interest in? How much of the island do these stakeholders have interest in, and where? Can you explain why there is not one mention of homeowners, private landowners or the general public in this general plan? Why have these people not been included in this general plan? I not only disagree with this general plan but I do not give you consent to proceed with this general plan. Sincerely,	28
There are many "farms" on the Big Island with one or more vacations rentals operating on agricultural land. Many of these "hobby farms" are tourist accommodations first, and actual farms - if at all - second Definition of agriculture, and agricultural, from Wiktionary: agriculture The art or science of cultivating the ground, including the harvesting of crops, and the rearing and management of livestock agricultural Of or pertaining to agriculture the agricultural class An agricultural tool agricultural show Agricultural land is not intended for transient tourist trade accommodations, STVRs. Agricultural land is for farming and/or ranching.	62
On page 28, under Priority Actions 4.e, Conduct a review and revelation of the real property tax structure to assure compatibility with land use goals and policies, are you indicating that property tax would be a weapon to get us off our property? We are retired seniors and this is our forever home we would like to leave our children and grandchildren.	29
On the same page under Public Engagement, you seem to discourage any such. People who own the land should have say. By the way, what is "smart growth development" and "Smart Growth principles"? Does this refer to Smart Cities, ala UN Agenda 21?	26
In the future land use map, I noticed that our property is being zoned to natural and recreation from low density urban. What does that do to the value of our property? Are we going to be compensated? By whom? The mysterious stakeholders? On page 25, Table 4, under the Regulations bullet is the statement Zoning must be updated in certain areas to reflect shifting trends and land use preferences. Whose desires and who's deciding? Does it include property owners?	26
10.g Amend the Zoning Code to require Plan Approval for commercial open area recreational uses in the County Agricultural District. p 62 These uses should require approval by the relevant Planning Commission, and there should be safeguards as for agricultural tourism.	63

10.c Create and adopt a County Agricultural Tourism program p 62 The plan should add a requirement that revenues from agricultural tourism do not exceed revenues from an owner's agricultural activities, and add safeguards against noise, lighting, wandering visitors, etc. that may disturb neighbors.	63
10.b Conduct a study to review a maximum developable area consideration for properties designated as Productive Agricultural lands. p. 62 There should be a stipulation that any development support agriculture (workforce housing, etc.)	63
10.10 Provide flexibility to allow for adjacent compatible uses for large-scale agriculture with industrial components, such as carbon sequestration. p. 62 There should be a statement re. whether the County ever adopted any policy re. carbon sequestration, and what type of public input occurred. If there is no policy, carbon sequestration should not occur without ample opportunity for public input. It is expensive, and earthquakes, eruptions, floods, and other events can release carbon stored underground. "Technologies that capture carbon dioxide emissions to keep them from the atmosphere are central to the climate strategies of many world governments as they seek to follow through on international commitments to decarbonize by mid-century. "But they are also expensive, unproven at scale, and can be hard to sell to a nervous public - making unworkable, at the moment, the model envisaged worldwide of capturing carbon and storing it for money. "Underscoring the current hurdles, the International Energy Agency (IEA) said in a November 23 report that the oil and gas industry is relying excessively on carbon capture to reduce emissions and called the approach "an illusion," sparking an angry response from OPEC which views the technology as a lifeline for future fossil fuel use." [underlines added] Explainer: Why carbon capture is no easy solution to climate change, Leah Douglas, Reuters, November 27, 2023, https://www.reuters.com/business/environment/why-carbon-capture-is-no-easy-solution-climate-change-2023-11-22/ See also https://www.sierraclub.org/sites/default/files/2020-Sierra-Club-Climate-Resilience-Policy.pdf	63
10.6 Any subdivision or farm labor housing complex developed on Productive Agricultural Lands should be clustered to minimize impact. p. 62 Subdivisions should not be developed on these lands.	63
10.5 Support the development of small-scale visitor accommodations that directly promote the agriculture industry, health and wellness industry, or are near points of interest. p. 62 Only accommodations that directly promote agriculture should be allowed.	63
A policy to support small-scale agriculture should be added.	63
9.d Amend the Zoning Code and Subdivision Code to establish Clustered Rural Subdivision PUD. p. 60 The meaning of "Clustered Rural Subdivision PUD" should be explained.	60
Maximize the alignment and use of Rural designated lands to preserve rural character and lifestyle. p. 5 The meaning of "maximize the alignment" should be explained.	60
Bike paths should be added.	55
The plan should explain, for all types of development, pp. 51 ft. whether "service area" means the acreage specified, or the areas listed, or something else.	52
8.e Amend Zoning Code to: i. Establish a TOD floating zone project district.... li. Create a TND overlay zone... p. 50 The terms "TOD floating zone" and "TND overlay zone" should be explained.	51
Priority Actions 8.a Incorporate innovations such as form-based code "mixed-use zones" ... p. 50 The term 'form-based code 'mixed-use zones' "should be explained.	51
8.43 Coastal resort developments shall provide public access to and parking for beach and shoreline areas p.49 Specify "public" parking.	50
The maps provide a wealth of information, but that information is difficult to access. Explanations should be provided for all changes. Paper maps should be put up in the Hilo and Kono County buildings. Colors/ patterns should be improved--colors look identical for "rural" and "extensive	35

agriculture" "light/service industrial" and "university" and "productive agriculture" "recreation" and "natural"	
Productive agricultural lands were determined by including the following lands... In North and South Kona, the "coffee belt", is a continuous band defined by elevation, according to input from area farmers p. 33 The plan should specify where the "coffee belt" is.	34
Urban Expansion Reserve Allows for a mix of high density, medium density, low density, industrial-commercial mix, and/or natural designations in areas where growth may be desirable, but where specific settlement and infrastructure have not yet been determined. p. 32 Mixing housing, industrial, and natural uses can result in severe impacts on safety, health, and natural resources, plus divisive, time-consuming, and energy-draining controversy over planned uses.	33
POSSIBLE ZONING DESIGNATIONS RM, RCX, V, CG, CDH, MCX, ML ...[etc] GP DESIGNATION ...DU/ ACRE... UGA p. 32 SLU p. 33 A word search of the draft plan failed to turn up any definition for these acronyms, making many parts of the plan incomprehensible. The plan must include a list of acronyms.	33
General Plan Land Use Maps and Designations p. 32 The plan should explain why each change is proposed. Detailed information about how designations may be changed is only available to people with computers who are aware of the "swipe" tool and learn how to use the tool and comment bubbles. The changes should be displayed on large paper maps at Hilo and Kono County buildings so more people can access the information.	33
6.d Amend the Zoning Code to allow for Planned Unit Developments (PUD) to become administrative permits and subject to the approval of the Planning Director. p. 29 PUDs must go through the relevant Planning Commission and County Council. An administrative permit was how an old-growth forest at Waikaku'u was almost chopped to the ground. It was only saved by residents Patricia and Richard Missler putting their own money and time into a five-year legal challenge that ended in success in 2017. "The /CA decision upholds a 2013 ruling by 3rd Circuit Judge Ronald Ibarra, who said former Planning Director Bobby Jean Leithead Todd and the county Board of Appeals failed to uphold the county's duty to protect natural resources in awarding a planned unit development permit to a South Kono developer The Missiers' attorney, Michael Matsukawa, argued county planners also ignored an old-growth ohia forest on the property and the possible presence of the Hawaiian hawk and a rare palm tree. Planning officials admitted they never conducted a site visit, despite the Misslers and other neighbors requesting one." https://www.hawaiitribune-herald.com/2017/07/02/hawaii-ne ws/kona-deve/opment-plan- upheld-as-/aw/ Kono development plan upheld as law, Hawai'i Tribune-Herald, July 2, 2017	30
Increase equitable planning and decision-making processes. 6.b Implement efficiencies to make development decisions predictable, fair, and cost-effective. p. 29 Add: "while still protecting the environment, culture, and the community as a whole".	30
4.a Develop a process for County-initiated State Land Use boundary reclassification. p. 28 See related comment for p. 26.	29
Sentence types are mixed, hampering comprehension. 4.3 Zoning, subdivision, and other applicable ordinances shall provide for and protect open space areas. Declarative sentence 4.4 Support mechanisms, such as Planned Unit Development and Cluster Plan Development, that cluster density to preserve open space, recreational areas, or scenic viewsheds. p. 27 Imperative sentence 4.7 Power distribution should be placed underground when and where practical. 4.8 Encourage developers of new urban areas to place utilities underground. p. 27 These recommendations should be combined. 4.Route selection for high-voltage transmission lines should include consideration for setbacks from major thoroughfares and residential areas. Where feasible, delineate energy corridors for such high-voltage transmission lines. p. 27 We should encourage distributed power sources, instead of centralized, to increase resiliency.	28
Diversify economic drivers. p. 26 For economic drivers we should be moving away from destructive, extractive actions such as military operations and tourism, and moving toward producing more of what we need on the island.	27

Program the initiation of rezoning in targeted growth areas p. 26 Identify who will do this and explain the meaning of "program". Remove barriers to residential development p. 26 Specify which "barriers" are in question. Advocate allowing for County-initiated State Land Use Commission District Boundary Amendments to meet the preferred land use pattern. p. 26 The current system should remain, so developments are proposed one by one, so agencies and communities have time and energy to address impacts. Establish a framework for cultural impact assessments including recognizing findings and recommendations of prior cultural impact assessments within the same ahupua'a for new projects. p. 26 New information and knowledge about cultural impacts, that may not have been available for prior assessments, must be sought and publicized.	27
Coordinate with the Department of Health (DOH) to address unique land use situations on the island related to individual wastewater systems (IWS) and prioritization of resources. p. 26 Clarification is needed on the meaning of "unique land use situations". County departments can provide greater flexibility in privately owned and maintained infrastructure concurrency requirements. p. 26 On the contrary, concurrency requirements should be strengthened, not watered down. Lack of concurrency has led to long-term problems in Kono with woefully inadequate infrastructure (road capacity, flood control, etc)	27
NIMBYism can present barriers to collaborative processes. p. 25 Public hearing processes can become political rather than regulatory processes. p. 25 These statements show lack of respect for the community and for laws that protect natural and cultural resources.	26
There is a common perception that all development is contrary to protecting natural and cultural resources. p. 25 All too often, natural and cultural resources are indeed destroyed. See the book Land and Power in Hawai'i.	26
Land Use Commission protections against unwise development should be maintained. The State's historic review process has been cumbersome. p. 25 The review process is needed to protect irreplaceable cultural treasures. Instead of trying to weaken protections, the County should advocate for adequate funding for the State Historic Preservation Division.	26
The current regulatory process dictates that the State Land Use Commission must preside over boundary amendments that exceed 15 acres, which limits the efficiency of ensuring consistency in the land use pattern. p. 25	26
Amend the Zoning Code to require Plan Approval for commercial open area recreational uses in the County Agricultural District. p 62 Zoning should NOT be amended in AG land, it is important for sustainability	63
10.c Create and adopt a County Agricultural Tourism program p 62 The plan has no merit. Private land owners don't want to be disturbed. It is also a liability with livestock and trespassing.	63
10.b Conduct a study to review a maximum developed area consideration for properties designated as Productive Agricultural lands. p. 62 This should be deleted. Private property AG land should not be considered for anything other than what the property owner desires. It should not be considered for "maximum development".	63
10.6 Any subdivision or farm labor housing complex developed on Productive Agricultural Lands should be clustered to minimize impact. p. 62 Define clustered, subdivisions should not be developed on these lands. There is no proof carbon sequestration will be effective, it is expensive, obtrusive, and the entire premise of global warming from CO2 level increase is unfounded. Earthquakes, eruptions, floods, and other events release carbon stored underground. CO2 only makes up 0.04% of our atmosphere and is necessary for photosynthesis.	63
10.5 Support the development of small-scale visitor accommodations that directly promote the agriculture industry, health and wellness industry, or are near points of interest. p. 62 Only accommodations that directly promote agriculture should be allowed. More transparency is needed in reference to the "health and wellness industry" and why they are in this section or remove it. Those industries are not an integral part of AG land use. They are a bi-product of good farming practices.	63

Objective 10 Support the active use of Productive Agricultural lands. Policies p. 62 A policy to support small-scale agriculture should be added	63
9.d Amend the Zoning Code and Subdivision Code to establish Clustered Rural Subdivision PUD. p. 60 The meaning of "Clustered Rural Subdivision PUD" should be explained.	60
Urban Expansion Reserve Allows for a mix of high density, medium density, low density, industrial-commercial mix, and/or natural designations in areas where growth may be desirable, but where specific settlement and infrastructure have not yet been determined. p. 32 This should be deleted! Mixing housing, industrial, and natural uses can result in severe impacts on safety, health, and natural resources.	33
Amend the Zoning Code to allow for Planned Unit Developments (PUD) to become administrative permits and subject to the approval of the Planning Director. p. 29 This should be deleted! The people do not want to live in Units and these "planned units" are against current zoning codes.	30
Develop a process for County-initiated State Land Use boundary reclassification. p. 28 See related comment for p. 26. Transparency for "boundary reclassification" is needed. What exactly are the boundaries in question and what will it be reclassified to?	29
Route selection for high-voltage transmission lines should include consideration for setbacks from major thoroughfares and residential areas. Where feasible, delineate energy corridors for such high-voltage transmission lines. p. 27 Encourage - incentivize "off grid" or distributed power sources, instead of centralized, to increase resiliency.	28
4.4 Support mechanisms, such as Planned Unit Development and Cluster Plan Development, that cluster density to preserve open space, recreational areas, or scenic viewsheds. p. 27 Define "cluster density". This should not be in regards to developing apartment style homes	28
4.3 Zoning, subdivision, and other applicable ordinances shall provide for and protect open space areas. These new zonings shall not hinder current land owners who have a right to own their property unhindered by governmental policies.	28
Coordinate with the Department of Health (DOH) to address unique land use situations on the island related to individual wastewater systems (IWS) and prioritization of resources. p. 26 Clarification is needed on the meaning of land use situations Explain clearly what the "rezoning" will be and clarify if AG land will be affected. The current zoning for Hawaii island is 80% AG. Any reduction of AG is contrary to sustainable production of food. Transparency is needed on what the "preferred land use pattern" is. The current system should remain, so developments are proposed one by one, and agencies and communities have time and energy to address impacts.	27
The current regulatory process dictates that the State Land Use Commission must preside over boundary amendments that exceed 15 acres, which limits the efficiency of ensuring consistency in the land use pattern. p.25 Land Use Commission protections against unwise development should be maintained when it comes to outside large scale developers. However, property owners should not have more regulations and rules than they already have.	26
In October of 2016 President Obama issued the following executive order Coordinating Efforts To Prepare the Nation for Space Weather Events - Executive order 13744 (https://www.govinfo.gov/appl/details/DCPD-201600692) Section 1. Policy. Space weather events, in the form of solar flares, solar energetic particles, and geomagnetic disturbances, occur regularly, some with measurable effects on critical infrastructure systems and technologies, such as the Global Positioning System (GPS), satellite operations and communication, aviation, and the electrical power grid. Extreme space weather events-those that could significantly degrade critical infrastructure-could disable large portions of the electrical power grid, resulting in cascading failures that would affect key services such as water supply, healthcare, and transportation. Space weather has the potential to simultaneously affect and disrupt health and safety across entire continents. Successfully preparing for space weather events is an all-of-nation endeavor that requires partnerships across governments, emergency managers, academia, the media, the insurance industry, non-profits, and the private sector. It is the policy of the United States to prepare for space weather events to minimize the extent of economic loss and human hardship.	28

The Federal Government must have (1) the capability to predict and detect a space weather event, (2) the plans and programs necessary to alert the public and private sectors to enable mitigating actions for an impending space weather event, (3) the protection and mitigation plans, protocols, and standards required to reduce risks to critical infrastructure prior to and during a credible threat, and (4) the ability to respond to and recover from the effects of space weather. Executive departments and agencies (agencies) must coordinate their efforts to prepare for the effects of space weather events.	
The meaning of "Clustered Rural Subdivision PUD" should be explained. WE THE CITIZENRY DO NOT WANT CLUSTERED HOUSING!	60
Only accommodations that directly promote agriculture should be allowed. More transparency is needed about the "health and wellness industry" and can you explain why Health and wellness is connected to promoting the Ag land use industry? There is no logical and financial appropriateness so please remove it. Those industries ARE NOT AN INTEGRAL PART of AG land use. They are a byproduct of good farming practices. We would want to see specific plans for small farmers to sell their foods instead of importing so much produce. Also, we would like to see workshop plans to teach how to grow natural food without pesticides and herbicides which are killing us (look what the Sugar Industry did to our lands for many subsequent years and our good bugs like butterflies and indigenous plant wildlife.	63
A policy to support small-scale agriculture should be added!	63
add in "pre-existing" after "any"	64
add in after "forestry" "and the ecosystem services that result from well-managed rangelands"	63
replace "farm labor" with "agricultural worker"	63
add in after "Sequestration" - timber or food processing operations Comment: "industrial components" meaning "carbon sequestration" is confusing here	63
remove "farm labor" replace with agricultural worker	63
add in after "facilities" and compatible worker housing	63
Add in after "productive" and extensive agricultural lands	63
The General Plan provides planning tools to incentivize the highest and best use of productive agricultural lands. The Plan's policies and actions are aimed at maintaining the viability of the agricultural sector by preserving productive agricultural land, promoting local food production, supporting sustainable farming and ranching practices, mitigating urban encroachment, strengthening the local economy, and contributing to the conservation of the island's biodiversity.	62
One of the primary challenges to the maximization of agricultural production is access to affordable land. Productive agricultural land values have risen beyond their value for agricultural purposes due to increases in non-agricultural residential uses. The agricultural industry is constantly evolving and has shifted away from larger scale production and now includes value added processing and agricultural tourism. This shift has resulted in the need to manage large tracts of otherwise unmanaged agricultural lands. Unmanaged lands are often full of fire-prone grasses and shrubs which create dangerous conditions for potential fires. The land use regulatory system must be flexible to adapt and allow the agricultural industry to make changes that help it to succeed and encourage that all agricultural lands are managed.	62
Agriculture, including but not limited to farming, ranching, forestry, nursery, and aquaculture operations, holds a crucial role in Hawai'i for its significance in the economy, food security, environmental sustainability, and cultural heritage. Land use planning policies directly impact agricultural land productivity, shaping the future of farming practices, food production, and the overall agricultural landscape on Hawai'i Island.	62
The general plan is just an atrocity. It has nothing to do with Hawaii. Cluster buildings? How on earth does that make sense on a tropical island. We are fine. We live here because this island does NOT have cluster buildings. As a community of free spirited honest hard working people we should all oppose this insane plan. How are you going to get it to happen? Destroy what we have	28

worked for so hard with fire? And then take over people's land? How else are people going to agree? I have deep concerns.	
3) Land Use Maps - I find it very interesting that you are continuing to place high density urban development close to the shoreline (where the potential for tsunamis and hurricane destruction is a real thing) in both Hilo and Kailua Kona when at the same time, you are complaining about the changing weather and how this will affect peoples lives. If you really care about people, then please move those high density urban plans uphill and AWAY from the coastline. For Kailua Kona, you need to place your high density urban development mauka in Kealakehe within walking distance from the County bldg and School.	35
Thank you for the opportunity to provide the following comments and concerns regarding the 2045 Draft General Plan. I purchased my Papaikou property (TMK:(3) -2-7-004:25) in early 2001. One of the key factors in my decision to purchase this parcel was the fact that it was designated in the LUPAG as "Low Density Urban" (LDU). The current draft of the 2045 General plan is proposing to change this designation from LDU to Important Agriculture (IA), which I believe would be a strategic error. This parcel of land has been designated for urban expansion for the past 60 years, due to it's strategic location and available infrastructure. This was true then, and is even more valid today, and will become critically important in the years ahead given the current struggle to provide workforce housing for Hawaii's people. Attached are some of reasons why the parcel should remain in LDU for your consideration. 1.Available infrastructure Water- A County well and storage tank is available to the parcel with possible upgrades required, Note- an 8"water service line was recently installed adjacent to property. Ample water (aquifer) is available at site for private wells. Waste Water -The County waste water facility has ample capacity to service 300+ homes, with sewage transmission lines currently installed at site. Note- Building more than 50 homes requires a waste water treatment system, which would be cost prohibitive .. Electrical - Phase 3 power available to site. Bus service is available to the site. School- Kalaniana'ole School K-6 adjacent to the site. Project adjoins the Hawaii Belt Road which will minimize the impact on smaller feeder streets. Parcel has a large number of existing interior roadways, thus reducing the overall project cost. Project is outside of Lava Zones 1&2. Ocean access- Project will provide recreational access to ocean as well as need parking. 2.Smart Growth Papaikou Agrivillage will be a model project for the island and the state-Green energy, agriculture, access to ocean and recreation, commercial services, pocket neighborhood, closer community relationships (plantation villages). Available agricultural land on Hawaii island - It is estimated that less than 4% of Hawaii Island is used for growing crops. The subject parcel represents a fraction of a percent of available agricultural land on the island. There is more than enough ample land available on Hawaii island alone to feed our entire state's population, many times over. The proposed agricultural community concept will provide residents with individual garden plots which will enable them to grow food on the undeveloped portion of the site (which is estimated to be at least 40 acres). Urban infill vs sprawling growth- The project is surrounded by residential neighborhoods on all sides. Walkable healthy neighborhoods- The project is already a favorite spot for families to walk their dogs, strollers etc. Pocket Neighborhood designed to increase socialization within the community. Project Architect is Ross Chapin, Founder of the "pocket neighborhood" design concept (https://pocket-neighborhoods.net). Thousands of people that are currently waiting for housing will be given an opportunity to live in a unique community that offers ocean recreation, farming, walkability and closer connections between neighbors. Needed services will be made available in the neighborhood commercial center (medical clinic, Kupuna and Keiki care, cafe etc..) Project has wide ranging support with various groups including Native Hawaiians, Habitat for Humanity, Hope Services etc Alternative Land Use Patterns- The alternative to this project would be to further the current land use patterns by creating more gentleman estates. Their are numerous examples of these along the Hamakua Coast. Typically, the land is fenced and gated with large hedge rows of palms or bamboo that completely block the coastal views. These views can and will be protected under the community development agreement. Shropshire Group LLC is in the process of proceeding with a 20 IH application and is also negotiating with other master developers who have expressed interest in joint venturing on	33

the project. We urge you to please reconsider the proposed IA designation and maintain the parcels existing LDU designation.	
HRSF is a 501.c.3 established to support good stewardship and best management of the natural resources that are Hawaii's rangelands. We do this through a combination of education, research and outreach and offer ourselves as a resource to the County as we update our County General Plan. Rangelands comprise approximately 750,000 acres or about 20% of the State's total land area. Over 550,000 acres or 73% of that total is on the Big Island alone. Clearly rangelands are a major component of our landscape and contribute significantly as a factor of food production for our grazing industries, primarily Hawaii's beef industry. However, perhaps even more importantly and often understated or underappreciated are the value of the benefits to the broader community of the suite of eco-system services that flow from well managed rangelands. These ecosystem services include wildfire mitigation, invasive species control, watershed enhancement, habitat protection, biodiversity, cultural values, and the aesthetic contribution of open space and vistas that make Hawaii so special. The current draft plan discusses many if these under "Collaborative Biocultural Stewardship" and elsewhere. In 2021, our foundation worked with the Hawaii Cattlemen's Council and a team of experts who explored and ultimately produced the attached peer-reviewed article the was published by MDPI in the Land Journal on July 20, 2021. It is entitled "Maintaining the Many Societal Benefits Rangeland; The Case of Hawaii". It describes and provides context for the eco-system services mentioned above. The article also recognizes the critical role Hawaii's ranchers and farmers have played for many decades as the boots on the ground stewarding these resources pointing out the need for ranching and farming to survive if not thrive to ensure that their stewardship function and its benefits to the broader community continue for generations to come. We suggest that this article be included as a reference document. We feel the GP could be bolstered with more emphasis on the important role of ranchers and those who manage the resources. In reviewing the current GP draft, we note that the words "cattle" and "ranch" appear only once. We feel there is room for more. I have worked with Bill Moore over the years in various capacities. HRSF appreciates Bill's willingness to assist us in starting this conversation then developing more detailed testimony for your consideration. My suggestion as a next step would be to schedule a meeting with you, Bethany, Bill, myself and Nicole Galase. Nicole lives in Volcano and she is the Managing Director for both the Hawaii Rangeland Stewardship Foundation and the Hawaii Cattleman's Council. From that meeting, we would expect to have a clearer understanding of how we could be of greatest value to this General Plan Update process including developing specific recommendations largely based on this article to incorporate into the forthcoming update.	63
Though I'm still unable to access the draft GP map with streets and zoning showing up at the same time, Section 9.b seems to insinuate (but is nebulously open to interpretation) that STVRs are going to be allowed by code amendment in FA and RA areas where they currently are not. I'm I reading that correctly? I'm strongly opposed to ANY ag lands, per State law (and the will of residents who fought for stronger, not weaker, STVR rules) having their use open to an increase in STVRs/TARs. My home is FA zoned. It is fertile, coffee belt land where Kona coffee has been grown as long as anywhere on the island. I made my living in significant part doing ag for 20 of the 24 years we've lived here. We still do some as do our neighbors. Before I get too far down this rabbit hole, I'd appreciate your thoughts about this proposed significant change. Suffice it to say that allowing "for home occupations that do not negatively impact rural character" is a statement that will cause untold, wasteful lawsuits for our county and residents, especially for those of us who'd like to be able to stay in our homes without being tour guides or being subject tot he whims of those who have an insatiable urge to use land as their cash cow rather than a place to live and earn a decent living without stepping on the toes of our neighbors. I hope you can clear this up for me asap as I'm trying very hard to comment by April 1st despite the challenging circumstances caused in large part by the platform the county is using and by a lack of in- person public workshops for those who need more guidance in using that platform or have important questions like mine. 9.a Amend the Zoning Code definition and requirements for Lodges and reconcile similarities and inconsistencies with the special permit provisions for Retreats. Clearly articulate in the Code the zoning districts appropriate for Lodges. CODE AMENDMENT 9.b Amend the zoning	60

districts currently listed as Family Agricultural District (FA) and the Residential and Agricultural Districts (RA) to be consistent with the Rural designation and to allow for home occupations that do not negatively impact rural character. CODE AMENDMENT Re 9a and 9b... As you know, one of the most important reasons not to increase STVR/TAR use of ag lands (or any property) is to avoid increasing the value (aka cost) of land that that kind of development causes. If this PD is sincere about wanting to add to the residential housing pool for middle income residents, you'll start by limiting, not adding the potential for, STVRs/TARs.	
We want to express strong support for this concept but it is unclear how it will be applied practically. Infill rezonings are critical, especially with the County's apparent choice in the Zoning Code Update to retain exclusive single-family residential zoning, which makes up 98% plus of residentially zoned land. Rezonings are extremely difficult because they are expensive, time-consuming, and controversial. In the ongoing absence of the entitlement by right in the RS district to build two, or three or four units, a concept that has been embraced in California, Oregon, Washington and elsewhere - the County needs to encourage and facilitate infill rezoning projects, perhaps even find a way to subsidize or sponsor them. Nearly all housing growth in the last decades in Hilo has been 1970s-style subdivisions on the edge of the urban growth areas. In Puna, it has been within large-lot, sprawling, sub- standard subdivisions. On the Hamakua coast, luxurious hobby farms on estate-sized lots have proliferated. These are the polar opposite of smart growth. But there is powerful inertia to continue the same, especially with the primacy of single-family exclusive residential zoning in both the schemes and dreams of the private sector and the regulatory grip of the public sector.	48
Consideration of complete streets and multi modal infrastructure, particularly walking and cycling, should be explicitly added as a factor in the evaluation of development projects	30
add in after "projects" including complete streets and multi modal infrastructure	30
How can a General Plan advance walking and cycling infrastructure? Far from the plantation days when walking-scale villages were serviced by sampans and narrow gauge rail, we live in a County that for half a century has given little thought to walking and cycling. Motor vehicles completely dominate transportation. There are zero miles of inter-urban bike trails, limited and often dodgy bike lanes, tracts of sidewalk-less suburbs, and alarmingly frequent motor vehicle violence wreaked on pedestrians and bicyclists. Unlike many subjects of County policy such as recreation, water supply and senior services, where we can continue in the General Plan to expand on a history of excellent work, for walking and cycling we need intense remedial action. We must completely refocus our efforts on multimodal paths and bike lanes to accommodate the increasing population and growing numbers of pedestrians and cyclists.	52
Following the above language, amend the text to include this language. Transit-oriented development (TOD) the development of compact, mixed use villages which would integrate housing, employment, shopping, and recreation opportunities. Villages would be designed around transit stations/stops which would reduce the need for daily trips and financially support the expanded transit system. Source KCDP Pg. 4.6 Village types defined transit oriented developments (TOD) vs traditional Neighborhood developments (TNDs) Both TODs and TNDs are compact mixed use villages, characterized by a village center within a high density urban core, roughly equivalent to a 5 minute walking radius (1/4 mile) surrounded by a secondary mixed density area with an outer boundary roughly equivalent to a 10 minute walking radius from the village center (1/2 mile) The distinction between a TOD and TND is that the approximate location of a TOD is currently designated on the Official Kona Land use Map (figure 4.7) along the trunk or secondary transit route and contains a transit station, while TND locations have not been designated and may be located off of the trunk or secondary transit route at a location approved by a rezoning action. Source KCDP Pg. 4-28	47
Regarding Draft GP map 3, it is suggested that the property that now appears as the newly proposed high-density urban and medium density boundaries located mauka of the Old Airport and makai of Queen Ka'ahumanu hwy be instead designated as Regional Center and Neighborhood TODs as designated in Kona CDP Official Land use Map, figure 4.7 This is important to ensure that proper mixed use master planning is carried out for the area. See the	38

recommendation from KCDP below. "Makaeo village (Regional Center) A major retail center is planned near the Old Airport park. As a mixed use village, the plan is to introduce residential uses into the mix, design a complementary relationship to the Old Airport Park, and integrate a transit hub or major park and ride facility for commuters. Source KCDP Pg. 4-40	
Land Use map 3 should indicate the TOD's that have been identified on Kona CDP Figure 4-7 pg. 4-36	38
Proposed amendment: Amend Table 6: Urban Land use bt adding TOD and TND to the list of "GP designation" in column 1 (see above) since it is the stated intent of the General Plan (see page 46) to adopt zoning policies to include both TODs and TNDs. Transit-oriented development (TOD) Transit oriented development floating zone (TOD) Mixed use developments located at strategic points along a regional transit system. TODs consist of moderate and high-density housing along with complementing public use, jobs, retail and services. Minimum land area. The minimum land area for a new community shall be consistent with the zoning codes requirement for project districts which corresponds to the urban and secondary core KCDP pg.4-41 High density village design guidelines Medium Density village design guidelines	33
Proposed amendment: Amend Table 6: Urban Land use bt adding TOD and TND to the list of "GP designation" in column 1 (see above) since it is the stated intent of the General Plan (see page 46) to adopt zoning policies to include both TODs and TNDs. Transit-oriented development (TOD) Transit oriented development floating zone (TOD) Mixed use developments located at strategic points along a regional transit system. TODs consist of moderate and high-density housing along with complementing public use, jobs, retail and services. Minimum land area. The minimum land area for a new community shall be consistent with the zoning codes requirement for project districts which corresponds to the urban and secondary core KCDP pg.4-41 High density village design guidelines Medium Density village design guidelines	33
In conclusion, I strongly urge the County of Hawaii to prioritize the integration of multi-modal trails into its hazard mitigation and disaster preparedness efforts, particularly in high-risk areas like Lahaina. By leveraging the benefits of multi-modal transportation infrastructure, we can enhance community resilience and protect lives and property from natural disasters. I look forward to seeing these recommendations reflected in the final version of the General Plan 2045.	31
7.8Encourage the development and implementation of Community Wildfire Protection Plans and Firewise Community Certification for communities with high wildfire risk. Community Wildfire Protection Plans and Firewise Community Certification are essential tools for enhancing wildfire resilience. In Lahaina, where wildfires are a significant concern, I recommend supporting the integration of multi-modal trails into these plans as essential evacuation routes. Additionally, promoting the development of fire-resistant landscapes along trail corridors can further bolster community safety in Lahaina.	31
7.7 Incorporate hazard mitigation strategies into policies and planning decisions using the most conservative models in delineating hazard areas. The General Plan should prioritize hazard mitigation strategies that prioritize community safety and well- being. Given Lahaina's vulnerability to wildfires, I urge the inclusion of multi-modal trails as integral components of hazard mitigation policies. These trails can play a crucial role in facilitating evacuation efforts and improving emergency response capabilities in Lahaina and neighboring communities.	30
7.6Reduce development intensity in identified high-risk hazard areas. Reducing development intensity in high-risk hazard areas is a prudent strategy to mitigate disaster risk. In Lahaina, where wildfires pose a significant threat, I recommend exploring opportunities to designate multi-modal trails in these areas. Integrating trails into hazard mitigation strategies can provide residents and visitors with safe evacuation routes and enhance overall community resilience.	30
7.5 Discourage public investment/infrastructure that supports increases in density, while allowing such investment to support existing residents and facilities. While it's important to discourage development in high-risk hazard areas, we must also prioritize investments that enhance community safety and resilience. Multi-modal trails offer a unique solution by providing alternative transportation options and doubling as evacuation routes during emergencies. Therefore, I	30

suggest that the General Plan encourage the development of multi-modal trail networks in Lahaina and other areas susceptible to natural hazards.	
Consider natural hazards in all land use planning and permitting. Incorporating natural hazard considerations into land use planning is crucial, especially in areas prone to wildfires like Lahaina. I recommend that the General Plan explicitly recognize the potential of multi-modal trails to serve as evacuation routes during emergencies. By integrating trail networks into land use planning, we can enhance evacuation options and improve overall disaster preparedness in Lahaina and other vulnerable communities.	30
Transit Oriented Development Character Guidelines: Character: Vernacular architecture that respects the historic context and scale of the community, usually subject to design criteria •Urban Grid Street Network •Limited driveway access •On-street parking •Public off-street parking •Landscaping (including street trees where appropriate) commensurate with environment/water availability. •Sidewalks and/or walking or bike paths •Comment: "Why the qualifier ""appropriate""? Street tree/landscape codes need to be updated along with appropriate county agency/department capability as street trees and landscaping is part of good design from a holistic planning perspective - environmental, social/cultural/psychological. It is a quality of life issue that Hawaii County has long neglected." Note this Comment above applies in multiple locations in the tables of 1.3 from Table 11 through Table 17 describing 'Character guidelines.	53
Provide for the establishment of new Retreat Resort areas in appropriate locations. Comment: Too vague. Define appropriate.,	52
Industrial-commercial mixed-use districts should serve as transitional areas. Comment: "It should be noted that industrial areas around the island such as north of Kailua town and in Hilo became defacto ""mixed"" industrial/commercial areas because of it is cheaper to build commercial retail space in industrial warehouse type buildings in industrial zones bypassing the other requirements such as parking, landscaping, etc. At both Hilo and Kona these defacto hybrid areas due to the proximity to harbors and airports and adjacent urban centers they have become the ""gateway"" first impressions of our tourist visitors. "	51
Coastal resort developments shall provide public access to and parking for beach and shoreline areas. Comment: Need to define equitable public access facilities. Currently resort design public access facilities to deter easy public access. Limited parking regulated by guards and distantly located from the shoreline or recreational amenity without adequate facilities are the current norm. Ensure the standards for public access are improved accordingly.	51
. Lands to be kept in a largely natural state with minimal facilities consistent with open space uses along with agricultural land uses. Includes areas vulnerable to natural hazards, steep slopes, lava fields, and areas set aside for cultural and/or natural resource preservation purposes that are not necessarily under active management. Comment: "Per Priority Actions 5a, 7b, 7c, create Land Use designation(s) for ""Sensitive Lands"" (Environmental, Cultural, Hazard) that are protected by restrictions. "	35
Amend the Zoning Code to establish building setbacks for inland cliffs. Comment: "Are we assuming that there already is or will be zoning code for setbacks for coastal cliffs/palis? Besides safety of adequate setbacks along cliffs, also consider scenic view impacts. Scenic quality is continually being degraded as more development is sited on the edge of cliffs along the coast and other inland palis. Ensure protections against these incursions. NOTE: Waipio and other valleys."	32
During discretionary permit applications, the Planning Director may require a pedestrian, equestrian, and/or bicycle path when it is possible and safe to connect to existing or future drainage or active living corridors Comment: "Rather than waiting for applicants to apply for permit and rely on Planning Director discretion, opt instead for integrated regional overlays that identify environmentally/culturally sensitive corridors i.e. drainage, wildlife, riparian/coastal, scenic for designation as protected zones in which limited improvements like trails, pedestrian, recreational and interpretive amenities would be desired. Partnerships between public and private sector could implement these desired corridors improvements."	30

Should be part of the CDP implementation actions. Need to get funded in County budget across relevant departments as an INTEGRATED effort not the current siloed modus operandi. Increase in house capacity.	30
Create "Village Plans" for unique urban areas that include considerations for urban design, aesthetic quality, and the protection of amenities in adjacent areas through landscaping, open space, and buffer areas.	30
64.P. 28. Discretionary permit applications for uses that may impact view planes to and along the coastline, and areas of natural beauty should take into consideration visual impact assessments and propose conditions to mitigate scenic impacts where appropriate. Comment: "While the State law and our GP specifically call for preserving scenic beauty and protecting scenic resources, we do not have any analysis and data bases for what those critical scenic resources i.e. viewshed, etc. are, specifically from the public domain i.e. state and county major highway rights of ways, public parks, etc. Instead we rely on after the scenic quality is compromised and it is too late. Do not rely on viewshed mitigation as protection of scenic resources as it is a band aid. Initiate scenic resource inventory identifying critical scenic viewsheds and corridors for protection/preservation. Then put in place scenic quality overlays within GP and CDPs with related regulatory measures to preserve and protect these resources."	29
This gets to the County's inability to enforce time limits on zoning and permits. It could be better written, but the emphasis should be on the practice of revoking zoning changes, subdivisions or permits and the limit on excuses available to get extensions.	30
This should include infrastructure requirements for consolidation/re-subdivision of land.	30
We used to have a category called Open, but somewhere it got removed and replaced with Ag5. An open category would mean the owner would have to conform to standards compatible with the limitations of the land.	29
North Kohala infrastructure is not capable of handling developments of this size. Not only the water sources, but the roadways, electric power and solid waste facilities.	29
and greenway connections within and to adjacent uses	28
Hold variance holders and special permit holders accountable for conditions of approval and time requirements. Especially for after-the-fact permits.	27
Hold SHPD accountable for its own time schedule for responses.	27
and don't allow for flexibility for the density of the neighborhood.	26
Comment"Agreed. Policies like this one is indicative of a framework that has created the many challenges we currently face. Stick to the proven principles of" "smart growth"" starting with the locational siting, network connectivity and on down to finer grain. Many of our plantation towns around the island reflect ""smart growth"" principles."	50
Comment: "Agreed. Much of our zoning and subdivision code, including our land use maps are what got us to where we are now. Mechanisms like variances and PUDs are used as exceptions to the current status quo. Suggest overhaul of current system to mandate what is desired i.e. performance based; form based code which specifically show what is desired - integrated development that is environmentally sound, protects open space, higher density/ affordable, street networks with multi-modality and connectivity, etc. Basic smart growth principles in both urban and rural contexts that are appropriate to our island."	29
Flexibility is almost always considered to be reduced costs. This should be balanced by considerations of safety and durability. A lot of cheap houses that will self-destruct in 15-20 years is a poor option.	27
More than cumbersome, the inefficiency and unaccountability delay projects way too long. SHPD should be held accountable for its 45-day review deadline.	26
It is not only the layers, but the frustrating varying time delays at each level that slows things down.	26

Why is Waikoloa urban center and not Waimea? Waimea has more resources. Waikoloa only has more houses.	25
How will this be handled and overseen? Incentivized? Will Kānaka families be prioritized? Or will the state and county focus on recent transplants who move here with the desire to exploit ecotourism for their own personal gain (this happens a lot)?	63
And what is the plan to prevent these rising costs from continuing?	62
A lot of non-functioning ag land ought to be converted to conservation lands.	62
What of communities such as Waikōloa? Are we just going to be treated as the next mini Silicon Valley?	59
Stop privatizing parking!	52
Should be TWO or more paved roads. We CANNOT afford congestion during emergency situations.	52
What are some examples of "on-site" affordable housing?	51
Where do we draw the line with rezoning? Who makes these decisions? How much say does the community have in plans for rezoning adjacent areas?	48
I agree, so again, why is there so many urban planning in areas with little to no existing infrastructure on the previous maps?	47
...and? are we no longer supporting local business initiatives? Because I strongly believe that we need to focus on small, local businesses.	47
If this is so, then explain all the development slated around Waikōloa as based on the previous map. We do not have the appropriate infrastructure to support more large-scale residential projects here!	47
What in the actual heck is this?! What are these urban plans for Waikōloa?!	37
Such as? Are we talking about green scaping with native plants?	31
Is Hualālai considered "high risk"? She is overdue...	30
Including geothermal energy.	30
Unless I am mistaken, PUDs automatically mean HOAs, which I am opposed to.	30
No matter what, an AIS should ALWAYS be done for any development. This is step one. It should also be imperative that local organizations with good standing be hired for this work, rather than seeking our external agencies such as the Colorado Environmental Management of Military Lands (CEMML).	30
Define this analysis?	29
This is severely wanting for a more thorough definition. What will this actually look like? I completely agree that we need neutral spaces, but the mention of "reasonable land use" is highly questionable.	29
And how will this be overseen?	29
THIS. By all means, create affordable living situations on these lands with careful and concise planning.	27
NIMBYism is *not* the same as opposition to poor planning. I feel like this concept is used to sweep away genuine public concerns for land mismanagement.	26
Yet it seems there is a common push to rezone these fallow ag lands as potential urban spaces, as opposed to keeping them as open green space.	26
The "community's" vision, or the state and county's vision? How well represented are the voices of long-term residences when it comes to planning?	26

We need to cap rental prices. There are no many people who cannot afford to rent based on their income alone.	26
How is unaffordability determined?	25
Waikōloa is a suburb, not an urban area. We have no hospitals, only one road in-and-out, no stoplight at our horrible intersection, few diverse job opportunities, and only one school. There is nothing "urban" about Waikōloa. If there are plans to develop Waikōloa into an urban center, this is news to me (and other locals here).	25
Serious question: who actually determines land-use planning? If an individual organization purchases a land parcel, who oversees their developmental plans? Take the new shopping center in Waikōloa: it was placed directly in the middle of a historic stream system, Auawaiakeakua, which floods once every year or two (and sure enough, the center experienced a flood at the end of 2022). The center also has little to no green space and is, overall, a terrible eyesore. Did the county or state have any say in how they planned and, more importantly, actually executed their development?	24
Comment: While the State law and our GP specifically call for preserving scenic beauty and protecting scenic resources, we do not have any analysis and data bases for what those critical scenic resources i.e. viewshed, etc. are, specifically from the public domain i.e. state and county major highway rights of ways, public parks, etc. Instead we rely on after the scenic quality is compromised and it is too late. Do not rely on viewshed mitigation as protection of scenic resources as it is a band aid. Initiate scenic resource inventory identifying critical scenic viewsheds and corridors for protection/preservation. Then put in place scenic quality overlays within GP and CDPs with related regulatory measures to preserve and protect these resources.	28
Comment: Please define Clustered Rural Subdivision PUD. Please explain how it would be treated differently than any other subdivision in the Zoning and Subdivision Code.	60
Comment: Please explain how the Zoning district currently listed as Family Agricultural District and Residential & Agricultural District are currently inconsistent with Rural designation. Please explain the impacts of such proposed amendment on the living, building and occupational patterns in those various agricultural districts. If no impact, please state as such.	60
Comment: Please specify the referred to definitions and differences between Lodges and Retreats	60
Comment: All public support for short term visitor rental accommodations outside of resort areas should be removed.	60
Comment: All public support for short term visitor rental accommodation should be removed other than in designated resort areas.	60
Comment: There might be a reaction to this Draft General Plan that the thrust is toward acceleration of the process of development. With that perspective, and less than unanimity in endorsement by the public of this perspective, it would be most desirable that there would be County Council oversight applied to the enthusiasm of the Planning Department for all significant development, whether Planned Unit Developments or any other category of Development. If it is felt that the public would be supportive of this proposal then it should be subject to referendum rather than placed in the General Plan.	30
Comment: Please explain in detail the meaning of this directive. Explain what is a Cluster Plan Development. Explain why such a development cannot now be applied to all zoning districts with appropriate building site standards. Please explain what is special about Cluster Plan Developments that would argue that they should be allowed in any zoning district whereas a run-of-the-mill development might not be allowed in some zoning districts.	29
Comment: This, I believe is a State Commission responsibility. If it is County's impression that the State Commission is failing its responsibility, then please point out where those failures have occurred.	29
Comment: This of course demands identification of the targeted growth areas to begin with. And, of course, that targeted growth area needs to be identified to residents living within and nearby	27

its boundaries. Please specify with map identification where these targeted growth areas are at. Programming the rezoning in these areas might well be a proposal which should be preceded by referendum or public study of sentiment or reaction to this proposal. Media identification of these areas with open discussion should be encouraged before programming the initiation of rezoning.	
Comment: I will infer from this proposal that currently Land Use District Boundary Amendments are a function prescribed to the State. This makes sense since the natural tendency toward urban expansion meets interface with Lands subject to Department of Agriculture and DLNR oversight. I would be surprised if there is not capability of urban planners and the County to make their wishes known and advocate for those designs within the current State Authority. However it seems entirely appropriate that, consequent to communication and collaboration between the State Commission and the County that the State Commission would take responsibility for initiating District Boundary Amendments to be considered by their Commission. It seems that this procedural proposal runs counter to reasonable administrative divisions.	27
Comment: Collaboration is always desirable. Please describe what is currently the impediment to collaboration.	27
Comment: Please give examples of where more flexibility would be desirable. Please indicate the basic problem that is being approached by increasing flexibility, and explain how that flexibility will yield improvement in that problem.	27
In North Kohala and in general on Hawaii Island there is a housing shortage and a shortage of farm housing for farm workers. Adding regulations to make it harder for working farms to retain and house workers at reasonable rates will hurt farms, and hurts small farmers who need access to land and to housing themselves, and food security. As long as workers are actually working in the farm industry, whether full or part time, on a working farm, that should be sufficient.	63
Why did our Mayor state he was going to streamline building permits? Nothing has been done to accomplish this...in fact, it is more difficult to process these applications currently.	26
I DO AGREE County roadway standards aren't modernized and remain a major cost to development. WE DO LACK SAFE ROADS & DELAYS IN TRANSPORTATION!! Now that the County has all this extra tax from the high assessed values, it needs to do more infrastructure work on the roadways especially in high use roads that are one lane each way.	26
As long as the utilities are not contaminating with inadequate sewage, I see no reason to not allow the income stream from the short-term vacation rentals. I affirm that The County does not favor the hotel industry and cut off the income needed by legitimate vacation rentals, as the County has made regulations to enforce the adequacy of the homeowner rentals for visitors who want kitchens and a more rural experience than can be had in a hotel.	60
Create a County Department of Agriculture that assists current and new farms with financing, market connections, access that opens new doors, and funnels more state and federal resources to agriculture and farming communities.	63
How big are large-scale agricultural industry sites? Criteria could be determined by acreage or annual budget.	63
Invest in more health and wellness resources, peer support, business and cooperative development for farmers and agricultural workers. Rates of stress, depression and other emotional health challenges are persistent for farming families. County government departments can provide education and information that reduce stigmas surrounding mental health and how it affects farmers.	63
Dedicate County resources (grants, loans, technical assistance) that support younger farmers with small farms (1-10 acres) to gain access and became stewards who lease parcels on public lands.	63
I would like to see maps that reflect that aspirational status of legacy zoning areas. While the general plan can not change zoning and down zone properties, it would be good to show areas where a more appropriate zoning, that is a down zoning could be achieved. For example legacy	26

zoning in the Hamakua coast that is currently industrial from the plantation era but would be better as residential, open space or conservation.	
Why specify this at all?	51
How do you justify making this statement without citing the source of the data to support it?	25
Developers should be REQUIRED to put power lines underground d to limit fire danger	29
The maps and the use of productive ag and Extensive ag need to be revisited. Can we get the Agriculture Advisory Commission to review these? Maybe UH CTAHR? We have Extensive ag lands where there is no water availability, in low precipitation areas, areas almost void of any natural vegetation.	63
disagree with the statement on pg 61 that "One of the primary challenges to the maximization of agricultural production is access to affordable land." The challenges, in reality, are the high opportunity costs of dedicating land to ag which is impacted by the cost of labor, availability of labor, limited market access, lack of USDA slaughter and Cut/Wrap for small animals. o Priority actions: Implement incentive structure to create an avenue for small animal industry. o Work with USDA and state to enable farmers to bring local meat to the local market.	62
Rural is fine although it could be used much more liberally in the maps. The model used to determine should be revisited. There are singular extensive ag parcels in the middle of large swaths of rural. There is also the example of small rural areas surrounded by large swaths of extensive or productive ag. I would imagine rural to be based on a balance between proximity to urban and viability for ag. It does not follow this concept.	59
This section creates variation in an already complex zoning process. Our island won't see the level of diversity of development to justify this kind of complexity. If you apply each of these rule cases we are almost getting down to property specific regulation.	47
Incorporate hazard mitigation strategies into policies and planning decisions -Balancing risk and availability of risk mitigation services- using the most conservative models in delineating hazard areas.	30
Anti-development sentiment is not appropriate in this document (Discourage public investment/infrastructure that supports increases in density, while allowing such investment to support existing residents and facilities.)	30
Create and deploy warning, notifications and evacuation protocols to save lives - don't implement stricter regulations. This will only result in higher costs and access will be reduced to only the wealthy. Property risk is assumed in these locations and protected by insurance.	30
Conduct a review and re-evaluation of the real property tax structure to simplify and assure compatibility with land use goals and policies. PROJECT	29
Why? Is the goal to reduce fire risk or to improve aesthetics. Encourage developers to consider aesthetics or consider fire hazards and balance costs.	28
HELCO states underground costs 6x more than above ground. This cost of this action/goal contradicts the goal to increase affordability.	28
o "Character of the community" creates an ambiguity locking change to the ways of the past. Better phrasing encourages learning from the past and adopting the opportunities of the future. The character of Kona significantly changed from the fishing village of the 80s to a tourist destination. Which character should development be evaluated against?	28
o Eliminate unpermitted structures by making it easier to complete an As-Built permit recognizing a 'workmanlike manner' as sufficient.. Recognize and remedy the conditions that exist that drive people to build without permits; timing, construction cost, design cost.	27
o Focus on ADUs is a specific perishable concept, recommend enabling increase in density based on availability of utilities and embrace an approach that increases a variety of density centric housing, apartments, townhomes, ADUs, mixed use res/comm. o Increase government funded infrastructure opposed to private centric focus.	27

o Lava zones affect financing and insurance which impacts affordability, there is a correlation between lower prices in lava zone 1 and 2 and higher prices in all other zones.	26
o Amount of different zoning codes is unnecessarily complex. o Codes used are generalized, not geographically considerate. Same building codes as harsher environments results in higher costs with little benefit to occupant. Use ICD as a starting point and remove unnecessary requirements for life and construction in HI. o Requirement of licensed individuals and government oversight and inspections is redundant and inefficient. If you gave them a license, why are you inspecting their work?	26
Water system capacity limits growth in urban areas and in rural areas, places cost, stability, and health burden on individuals. Also limits growth and stability of agriculture. o Power generation is focused on the north part of the island and is not distributed. Southern portion is inadequately supported if separated from the northern generation. o Expectation to go to 100% renewable is not mentioned. The challenges to diversify the sources of power generation, infrastructure to deliver it around the island. The infrastructure to handle the maintenance and disposal of these new systems. (eg Batteries and wind turbines blades) o Concentration of infrastructure and services creates a density focal point resulting in higher housing costs in the area where these services are located. Less desire to live where the services are not available. wider infrastructure would distribute housing pressure, reduce demand in hot spots.	26
County lacks ability to create and maintain robust road systems and relies upon state assistance. The County has only built 2 roads since 1980. Developers built all others.	26
New infrastructure burden is passed on to developers as a pay to play mentality which creates cost burden on housing. Roads, water, electricity and information.	26
New infrastructure burden is passed on to developers as a pay to play mentality which creates cost burden on housing. Roads, water, electricity and information.	26
This paragraph does not align the economy (County GDP) with employment. I would expect a discussion of correlation between where the money is, where the jobs are, and the locations and either the connection or disconnect between these are.	25
The three primary economic sectors are not reflective of where the 2/3 of workers are employed and it is not tied in here to the statement about poverty.	63
This does not talk about the dispersal of visitor accommodation which is important to meet various visitor desires/needs, could reduce traffic if they are co located with attractions, should be near services to support the economy and infrastructure that exists and where we want it to exist.	25
Change "Landscaping" to "Landscaping with native plants"	61
Is telecommuting currently an illegal activity if it occurs from a single family residence?	60
Is the clean up of Pohakuloa included in this General Plan. I don't see the acres of Pohakuloa addressed in this draft and yet, what happens there affects us all.	37
Can future planned or desired infrastructure like utilities, energy, water, etc. be overlapped with these maps?	46
Change "Landscaping" to "Landscaping with native plants"	54
Change "Landscaping" to "Landscaping with native plants"	53
Change "Landscaping" to "Landscaping with native plants"	52
Change "should" to "shall"	50
Change "should" to "shall".	50
According to the 2023 HTA Visitor Plant Inventory there are 7706 hotel rooms/timeshares, and 2788 STVRs. Hard to understand where the information to support a comment like "transient accommodation rental units are beginning to trend higher than hotel units". Even the UHERO Dashboard only reports 6847 short term rental units accross the island - and that includes those resort-zoned condos and apartments.	25

So happy to see this in here - this is much needed to help ensure farmers will have a clear path forward to participate in agricultural tourism	63
I was happy to see this continue into the new, draft GP. While there often seems to be a unilateral back-lash against short term vacation rentals, I think that most farms and farmers cannot make even the most basic ends meet on farming alone. This is a sector of tourism that offers strong supports of other key objectives of the Island - agriculture, preserving the character of the island, sustainable tourism. Eco-tourism and agricultural tourism have been identified as needing support in both the previous General Plan and CDPs and yet there have not been programs to define and support it. Agricultural tourism needs support so agricultural lands can be preserved and also be financially sustainable. When tourism is paired with agriculture, it strengthens agriculture by ensuring the farm delivers on the expectations of production, quality and a farm experience. It directly encourages agriculture.	63
Instead, we should be planning for a major down-powering of human societies. On this island, we should recognize as an alternate ('or default') economic construct, the values and skills of a basic 'subsistence economy' - which even today has its devoted practitioners trying desperately to hang on to despite the overlaid 'mainland' acculturation that is championed by the General Plan.	24
Resort development is NOT consistent with the character of the surrounding community at Punalu'u.	58
There are zero amenities close to Punalu'u. The closest grocery store is in Ocean View, and the location is two hours from Hilo or Kona airports. The closest hospital is Pahala. There is a single working well, and sewage facilities are substandard. Fire hydrants are broken, and there is no police or DOCARE presence, despite ongoing hazards to human and ecosystem health.	57
Note that Punaluu'u is not an appropriate resort location. Change the land use designation!	52
Tis is a prime reason why Punaluu'u is an inappropriate place for resort development, This designation must be changed.	50
Given that there is no sewage infrastructure in Kea`au, how would sewage be handled in a situation where urban expansion is planned?	45
The highway congestion between Hilo and Kea`au is such that 8 miles takes an hour to traverse. Exactly how would urban expansion in Kea`au be an improvement?	45
The summit of Mauna Kea is not conserved, it is an industrial development in conservation lands that are a National Natural Landmark, site of one of the largest archaeological and cultural important sites in the Pacific, and home to rare and threatened species found nowhere else.	41
The Land Use designation for Punalu'u needs to be reversed. This is not an appropriate place for resort development, given the presence of endangered species on the coast, the extensive cultural sites and burial grounds, and the failed infrastructure that puts the area a risk for wildfires, death, and habitat loss.	40
Open space area requirements in the code for subdivision should be increased. When a developer requests to develop a golf course that previously was part of their open space requirement, this should be denied and turned into a park	28
New development should require that all utilities are underground to maintain the safety of the people and dependability of the grid.	28
A TDR program should not be allowed to diminish open space requirements or increase density in areas without increasing infrastructure such as roads, sewers, water systems and per roof fees paid by new residents.	26
Developers should be required to provide adequate sewer processing, water, increase road capacity and pay a Per Roof impact fee to offset costs for police, schools, emt, libraries. Septic tanks should not be used unless the property is 1+ acres in size. Septic tanks to replace cesspools within a mile of the shoreline is detrimental to our ocean environment.	27

Developers should be required to provide adequate sewer processing, water, increase road capacity and pay a Per Roof impact fee to offset costs for police, schools, emt, libraries. Septic tanks should not be used unless the property is 1+ acres in size. Septic tanks to replace cesspools within a mile of the shoreline is detrimental to our ocean environment.	27
An orchid nursery, foliage farm, mamaki farm, and many other types of agriculture can provide sustainable income on far less than five acres.	34
How is greenfield development defined? What would that mean for the already appalling traffic, lack of opportunities for work, terrible infrastructure due to antiquated county policies, lack of adequate alternate routes, in Puna and more?	26
The county of Hawaii has been derelict in its responsibilities for far too long, and the State Department of Hawaii has turned its head. It is time the County stepped up to assure the taxpayers that our class AA waters are safe from sewage pollutants and our drinking water is not polluted.	26
I believe you mean migration from other states to reside here, as opposed to immigration from another country.	25
Waiakea Houselots is a largely residential area. I bought my house on Manono St. 19 years ago. I've raised my kids here. It's been a great area to live in. I have no intentions of moving or selling my property. So, it is an unpleasant surprise that my neighborhood is considered or will be considered industrial/commercial. I wonder how many of my neighbors are aware of this. My kid's friends all live outside of town in HPP and Pahoa. Who's house do you suppose everyone prefers to stay at?? Mine, of course, because from here they can ride their bikes to the beach, the park, the mall, etc., without getting into a car. My kids can walk to school and the university. It sure beats living on a gravel road in the middle of nowhere that you have to struggle with traffic to get to. Why would the county consider an area so great for residential living to be better used for industrial/commercial purposes?? Consider the businesses that have gone in over the last several years. The only one that built a quality structure is the finance factor building. The rest are ugly, cheap as possible construction glorified warehouses. No offense, S, Tokunaga store. or the complex that houses Hawaiian Style. What are the chances that future businesses built in this area in between our residences will be any better? The cheap construction style of these buildings is so incongruous with the architectural details found on our old Hilo buildings. This character in the architecture makes Hilo, Hilo. Is this what we want the gateway to Hilo (as we are across from the airport) to look like? As it is there are so many vacant commercial spaces all around Hilo. Why?? Because doing business in Hawaii is tough.	55
More than just landscaping or open spaces are needed to mitigate the impact of development. Trees need to be replanted. Everywhere you look around Hilo, trees are being chopped down at an alarming rate. Many of our old-growth trees, large banyans etc., are gone. Hilo is starting to take on that barren wasteland look of other places. It just looks awful to see the exposed backside of neighborhoods that used to be protected by a barrier of trees. Trees are so important. Trees not only beautify a town but encourage adequate rainfall, reduce the effects of pollution and provide privacy and a sound barrier to traffic noise.	50
Add: 10.j Establish tax incentives for kalo farmers to support Indigenous food ways and food security for Hawai'i County.	64
Add and change after "SHPD" "and place-based land stewards, culture and history advisory groups where applicable, as well as other, appropriate organizations, and stakeholders to create clear guidance while reviewing a project related to the identification of cultural sites and practices	30
Change wording to: Collaborate with the State Office of Planning, place-based land stewards, cultural practitioners, culture and history advisory groups where applicable, as well as other appropriate organizations, and stakeholders to create criteria and for Ka Pa'akai analysis.	29
Add: This should be done in collaboration with place-based land stewards, culture and history advisory groups where applicable, as well as other appropriate organizations, and stakeholders."	29

Add: "mandated and in collaboration with place-based land stewards, culture and history advisory groups where applicable, as well as other, appropriate organizations, and stakeholders."	28
Add: "through a consultation process with place-based land stewards, culture and history advisory groups where applicable, as well as other, appropriate organizations, and stakeholders."	27
Change wording to: Work with the State Historic Preservation Division (SHPD) alongside place-based land stewards, culture and history advisory groups where applicable, as well as other, appropriate organizations, and stakeholders during assessments of a project's effects on cultural sites and practices.	27
change wording to: Work with the State Historic Preservation Division (SHPD) alongside place-based land stewards, culture and history advisory groups where applicable, as well as other, appropriate organizations, and stakeholders when reviewing a project for identification of cultural sites and practices.	27
Congestion is created because we have a 2 lane highway that circles the entire island when it needs to be at least 4. Hilo and Kona have 4 lanes, which helps a lot, but then they empty out into a 2 lane highway, which isn't helpful. This is actually a state issue since the county handed responsibility of all highways to the state.	26
Comment: Yes, this is one approach, assuming that one is trying to accelerate residential development. Perhaps one needs to start by making the case for accelerating residential development. This is not a 'given'. It is a 'given' that we need more housing for our heritage residents, but it seems that a preponderance of development housing actually goes to immigrants. The County, for probably excellent reasons, seems unable to solve this problem, and so, as much as we build, build, build... there are still the same number of heritage residents who seem to have to move to the mainland to find work and housing that are more practical. Consequently I don't think that the assumption should be made that we need to remove barriers to residential development. Second, how is it determined which are the appropriate 'districts' for development. Changes in Urban Growth Boundaries must be clearly delineated for the public. One must respect expertise in determining where growth is appropriate, but the expression of the will of the public in and near those targeted areas is of importance to understand. It should be required that referendum or polling of residents in and near the targeted growth areas, or at least a 'targeted' presentation to those residents would be made in the process of determining the desirability of growth in that area. After all, are we talking about the Planning Department's desire, or the desire of the residents of that area? Undoubtedly, the ultimate application will be a reflection of both. But a mailer to each post office box or address in the affected area, with a careful inquiry into the desires of the area residents, should be a part of the process. The General Plan Land Use Map should not be completed until such an inquiry with the public has been completed.	27
Comment: All efforts to limit the proliferation of STVRs should be supported. Visitor Accommodations Tax needs to be applied to all STVR rentals. Visitor Accommodations Tax needs to be dramatically increased.	25
Comment: All of the above statistics need illumination. The domination of this population age cohort seems unworkable. The influx of retirement age immigrants is a challenge to our societal structure.	25
This problem might be improved by improving the attractiveness to the Developers of building Affordable Housing with modest discouragement toward building upscale homes. This might be accomplished by moving all Affordable projects to the head of the queue for permit review and building inspection.	25
Comment: Many people have concern that 90% of growth is from immigration. That concern rises to the level that many people feel that growth is not a good thing but in fact is damaging to the environment and our social structure. The proposal that Affordable housing permits and inspection should always be placed at the head of the queue of projects in the Building Division might help somewhat. Growth in housing development other than affordable housing or housing	25

for heritage residents should be discouraged, and domestic agriculture should be emphasized for the purpose of resiliency.	
Comment: Please explain the reason for this decline in population growth rate..	25
About 90% of growth is through immigration. Comment: The Office of Housing has regulations which favor current residents in opportunity for purchase of 'affordable housing stock' or rental of units which have been constructed or developed using 'affordable housing guidelines'. With 15,000 of the needed 17,000 housing units likely to be resided in by immigrants, and with lack of affordable housing being recorded as a pervasive cause of out-migration of current residents, please include the following proposal in the Draft General Plan in the section 'Housing'. " Any application for Building Division permitting pertaining to a project which qualifies as 11Affordable Housing11 according to Office of Housing criteria will be prioritized to be considered and examined by the Building Division ahead of any pending permit applications which would not have designation or fulfill Office of Housing criteria as 11affordable housing 11	25
Add agroforestry practices, alongside removals of invasives as other practices to invest in for climate resiliency.	64
Add: 10.j Establish tax incentives for kalo farmers to support Indigenous food ways and food security for Hawai'i County.	64
Add: 7.10 Utilize and employ traditional ecological methodologies to mitigate, adapt, and restore areas prone to natural hazards and disasters.	31
Add and change after "SHPD" "and place-based land stewards, culture and history advisory groups where applicable, as well as other, appropriate organizations, and stakeholders to create clear guidance while reviewing a project related to the identification of cultural sites and practices	30
Change wording to: Collaborate with the State Office of Planning, place-based land stewards, cultural practitioners, culture and history advisory groups where applicable, as well as other appropriate organizations, and stakeholders to create criteria and for Ka Pa'akai analysis.	29
Add: This should be done in collaboration with place-based land stewards, culture and history advisory groups where applicable, as well as other appropriate organizations, and stakeholders."	29
Add instead of "encouraged": "mandated and in collaboration with place-based land stewards, culture and history advisory groups where applicable, as well as other, appropriate organizations, and stakeholders."	28
Add: "through a consultation process with place-based land stewards, culture and history advisory groups where applicable, as well as other, appropriate organizations, and stakeholders."	27
Change wording to: Work with the State Historic Preservation Division (SHPD) alongside place-based land stewards, culture and history advisory groups where applicable, as well as other, appropriate organizations, and stakeholders during assessments of a project's effects on cultural sites and practices.	27
Change wording to: Work with the State Historic Preservation Division (SHPD) alongside place-based land stewards, culture and history advisory groups where applicable, as well as other, appropriate organizations, and stakeholders when reviewing a project for identification of cultural sites and practices.	27
The highest number of affordable housing you stated is in Puna, however lava zones 1 &2 (which is most of Puna) make it extremely difficult for households to secure a loan and or afford insurance for their properties. Is there any consideration of looking at how lava zones are used by financial institutions and others and examining if it is a method that needs to be reevaluated or revised?	25
Support those trying to grow food! Help with distribution/kitchens etc!	62
Change the word "should" to "shall"	29
Nuclear power is the ULTIMATE clean energy. It has ZERO carbon footprint. Waste is now highly sought after by Military and medical industries. It is fully scalable for demand making grid management simple. The latest technology is so safe it is almost impossible to calculate the	35

extremely minute risk. Nuclear is the power of our future! Hawaii has the PERFECT conditions for Nuclear. Pulling Sub 40 degree sea water from 3000 feet below sea level and the ability to not harm the ocean environment by expelling that water at the surface at a temperature that matches the surface environment temperature. As I said -PERFECT CONDITIONS! The plant should be built nearest to the largest electrical infrastructure. Too bad HECO and the deep state will never let it happen unless it makes a very select minority on the island extremely wealthy. Too bad our legislators will never buck the secret system that owns Hawaii.	
All of these bullets imply that you don't want public engagement. This is VERY concerning!	26
What do "government agency" have to do with Hawaii island's land use?	26
This again sounds like government overreach. Who is transferring what development rights?	26
Exactly whose "preferences" are you referring to? You are over stepping government authority!	26
"Multiple layers of land use control"? Why do you think you can control people's land through government and state agencies? People have the right to own property and have it unhindered by government!	26
Why exactly is the population expected to decline?	25
Did you ask the people what their goals are? These are the goals of UN that is run by the banking families!	24
This is looking like a "SMART" city plan where people don't travel more than 15 minutes away from home. NOT Pono! We are free people and you should be ashamed of yourself for trying to put us in a bubble for the outrageous climate change lie!	24
This should be change to Supporting communities to have abundance of food is the key objective of land use for the County! You are basing your key objective on a lie about climate and want to change our way of life due to that lie!	24
The General Plan suggests that the residential lots of Waiakea House Lots be allowed to be rezoned to Industrial/Commercial. I think that is a big mistake. The reason that Waiakea House Lots was one of the first areas to be developed for residential living in Hilo is that it was and is the best area in Hilo for residential living. No other area of Hilo has all the advantages that Waiakea House Lots has. As my wife and I can find employment pretty much any where, we considered locations all over the US and the world. After comparing the pluses and minuses we choose Hilo and after looking at homes in many areas of Hilo we chose Waiakea House Lots to purchase our home. There was a long list of advantages to the area but the biggest one for me was that it is the most centrally located area of Hilo. Our house is five minutes or less, from most everything that we need. Having lived in cities, suburbs and the country we have found the convenience of having all goods and services close by to be a big advantage. It is also good for the environment to use less gas. Loosing this residential area to any other type of zoning seems to be illogical at best and criminal at worst. Another reason changing zoning from residential is often a bad idea is that as businesses move into the residential area it becomes less attractive to the residents that are left, accelerating the exodus of residents. Once most of the residents are gone from the area there is no need for many of the businesses so they move to where the residents went, causing inner city decay. Inner city decay can be seen in cities all over the US and I assume much of the world. It is a lose, lose situation, that in the long run is not good for anybody. Hilo needs more housing. There are five lots within a block of my house that have had the zoning changed in the last eighteen years. With subdividing and ohana zoning there could have been up to twenty residents on those lots. Multiply that by the number of block in Waiakea House Lots and that is a lot of housing for Hilo. The fact that none of those rezoned lots have businesses on them is proof that the zoning changes were a mistake. My hope is the county planners will recognize their mistake and reconsider their plan for Waiakea House Lots.	55
Please reference key data points - Hawaii Tourism Authority / DBEDT Visitor Plant Inventory - as an example.	25

Is this accurate? According to the latest Visitor Plant Inventory there are more TVRs than there are hotel / timeshare units - and those TVRs are located islandwide. For example, there are more TVRs in zip code 96727 than there are rooms at Westin Hapuna. The data from www.AlltheRooms.com shows that there are 19,000 independent TVR units that have been rented in the last year on Hawaii Island. In comparison there are 2,915 hotel rooms and 1,397 timeshare units (for a total of 4,312) on the Kohala Coast.	25
Is commercial open area recreational uses defined somewhere?	63
I respectfully disagree if I understand what this is saying. For example, what if dairy use is incompatible with housing on the same parcel, but the dairy needs employees and providing housing is needed given local rents versus farm wages. My understanding is this would allow farm labor housing to be built on a parcel other than where the dairy operations take place, as long as that housing is dedicated to the specific ag operation.	63
Unwieldy planning talk for the concept - would be great to also have a plain language description for the ordinary reader.	60
I like this suggestion but the current TAR bill would clean up the Zoning code by eliminating the distinction of "Bed and Breakfast"	60
Yes to this. Have submitted comments on the map as to where North Kohala CDP subgroups would like to see Rural or Urban and where Ag should remain Ag	60
I believe this is what HB 1542 is intended to make easier. One of the most important initiatives for both protecting what is actually ag land (versus what was historically or classified pending additional consideration), as well as for facilitating better land use planning for our rural areas which also are in need of housing and smaller parcels to farm.	29
The process is broken. The neighbors are always going to be the most vocal and least likely to listen to accurate information about land use policies, CDP, Land Use Maps, etc. The general public cares in principle, but in the case of affordable housing, those in need are working multiple jobs and have zero capacity to show up for daytime Planning commission meetings. There has got to be a way to build better consensus during the GP/CDP process so there is more community understanding and agreement around agreed land use plan - and Planning Commissions can be directed to give weight to those plans rather than to the volume of NIMBY objections.	26
More urban trees are desperately needed to combat extreme heat and urban heat island impacts. We need the cooling effects of trees even more than ever with climate change.	52
Provide free or minimal cost parking that supports use of local businesses and restaurants by residents. Too many businesses in Kailua Kona Village are suffering due to extremely high priced private parking that have monopolized parking options in this area.	52
For Hilo, largely based on CDPs and Hilo zoning maps -Rethink PMAR identification due to Bill 107 -Corridor for nonvehicular traffic Singing bridge traffic think about different alternatives	45
UE Keaau, need opportunities for infrastructure. Pahoa land use based on CDP, Limited infrastructure investment (hazard zone) -Concern is that down -zoning reduces flexibility of what can be done in community- see Mountain View and Kurtistown areas. Puna CDP specifies centers they want to focus on. Proposed GP Land use map is consistent with Puna CDP, think about keeping the same rather than down zoning. -Stop subdividing in urban areas (HDU, MDU primarily) ADU bill could help prevent/mitigate this issue	46
Identify resort areas we want to see in future, given climate change impacts. -possible resort zoning already in GP Land use designations (HDU, MDU, LDU, UE) -be more explicit about possible alternatives for resort areas rather than "possible zoning" in land use table. -Move away from shoreline tourism, more toward family/eco base opportunities -Make note in narrative about current resort areas and options for relocation -Where would resort developers go?	35
Color code Land use map table	33

On the GP Land use map, expand the area allotted for centers (e.g Keaau, Pahoa, Mountain View, Kurtistown) -More opportunities for greater density in Hilo (e.g house lots areas) MDU to HDU	46
Designate a swath of land on either side of the Wai'ula'ula, Waikoloa, Keanu'i'omanō streams & tributaries as conservation/recreation/natural (whichever most appropriate) in order to protect the riparian corridor. With this designation, community groups may be able to restore and enhance this natural corridor. The streamside area could become an adequate buffer for: managing stormwater, reducing pollutant loads from current levels, protecting from property loss due to flooding and erosion, and creating healthy habitat for native aquatic species. With partnerships the corridor could also become a pathway for safe multimodal, zero emission, transportation options as an alternative from driving to and from Waimea town to the shoreline. The simple redesignation of land use on the map would fulfill a plethora of recommendations, strategies, and desired outcomes across a number of action plans including: The 2005 County of Hawai'i General Plan, the 2008 South Kohala Community Development Plan, the 2011 Wai'ula'ula Watershed Management Plan, the 2017 State Strategic Plan for Transit-Oriented Development, the 2021 Hawai'i 2050 Sustainability Plan, the 2021 HTA Hawai'i Island Destination Management Action Plan, and the 2023 County of Hawai'i Draft General P	37
How does the GP Impact the HPP issue? Possible resolution: The GP creates neighborhood centers for more proximate services and economic activity, providing for public infrastructure. The GP also promotes greater utilization of the Rural designation.	59
Help commercial/retail have greater flexibility with agricultural use. Agriculture PUDs should be utilized more.	62
Agriculture relies on many factors including labor, market, capital, infrastructure, etc. Ensure that policies uplift these factors to promote agricultural activity. Possible Resolution: Emphasize this in the narrative section.	62
Highlight urban/indoor agriculture as an opportunity for urban areas. Possible Resolutions: Could fit in economic agriculture and food system section.	62
Clarify County Vs. State Agriculture designations Possible Resolutions: Add clarifying language	62
Define what can be grown/raised on agriculture lands. Possible resolution: Add clarifying language.	62
Pg. 22-30 & 46-50 Diversifying the housing stock is critical to achieving affordability for residents. Promote the shift in perspective from big lot, big house to small lot, small house. Eliminating uncertainty (Politics) will result in greater investment.	24
Pg.26 & 46-57 Market urban areas to redirect developers to invest in urban locations. Zoning presents issues due to specificity and rigidity/outdated. Advocate for flexibility in zoning code. MCX, RCX, CDH zoning are underutilized. Not achieving density because there are few places zoned for it. Need infrastructure. Consider County-initiated regional zoning consistent with GP designations.	47
Pg. 26 & 46-57 Increase county initiated infrastructure investment (take advantage of available funding) Increase county initiated rezoning to help guide development where we need it.	47
Urban Neighborhood Centers should allow multiuse vertical development, and higher density for growth to occur.	54
Pg. 46-57 Seek opportunities for more mixed use and high density to improve affordable/middle missing housing issues.	47
The GP should recognize property tax inequities	29
Polices and actions within this section should not aim to get rid of non-conforming uses offer great benefits to the community and appeal to visitor industry and should be preserved.	27
Any urban expansion along the Hwy 11 corridor should include sewer facilities. The proximity to Keanuimano Stream and Waikoloa Stream and other runoff channels from the Kohalas make this a sensitive area.	37

I would be good to see any new urban development in a Wild Fire risk area planned in collaboration with Hawaii Wildfire Management Organization, the local Fire department and any other related organizations. This needs to be considered to ensure water for wild fire fighting, escape roads, and proper planning to reduce Wild Fire risk for all houses within the development occurs. - even if such development is the right path with the forecasted increase in Wild Fire events due to climate change - and that wild fire is a risk all year.	37
I have heard it said that by giving people the right to change the zoning of their property from residential to something else, you are giving them more options but what you are doing is taking away the rights of the people who want to live in the residential neighborhood and giving additional right to those that want to move away, The Planning Department should be doing just the opposite. They should be protecting the rights of those that want to live in the neighborhood from the actions of their neighbors who want to leave.	55
Changing the zoning in established residential neighborhoods to any other type of zoning is taking away the right of the residents of that neighborhood to continue living in a residential neighborhood. The purpose of residential zoning is to prevent that from happening. If the zoning change is allowed you negate the purpose of the zoning, making residential zoning meaningless. That is just wrong, any way I look at it. More to follow.	55
Protect Waiakea House Lots of Industrial zoning!	47
I disagree with MCX Commercial/Industrial zoning of East Lanikaula Street. I bought residential in House Lots 28yrs ago and want the neighborhood to remain residential. Several (5 within a few blocks) have been rezoned and left to grow weeds. No development has occurred. Spot zoning should not be allowed.	45
I disagree with having Waiakea House Lots designated MCX zoning for Commercial/Industrial. We bought our home in House Lots 28yrs ago as a residential neighborhood not industrial. There are a number of lots that have been rezoned and nothing has been done. They are eyesores in the neighborhood. Residential should stay residential.	55
Support sustainability and alternative forms of transportation! Designate a swath of land on either side of the Wai'ula'ula, Waikoloa, Keanu'i'omanō streams & tributaries as conservation/recreation/natural (whichever most appropriate) in order to protect the riparian corridor. With this designation, community groups may be able to restore and enhance this natural corridor. The streamside area could become an adequate buffer for: managing stormwater, reducing pollutant loads from current levels, protecting from property loss due to flooding and erosion, and creating healthy habitat for native aquatic species. With partnerships the corridor could also become a pathway for safe multimodal, zero emission, transportation options as an alternative from driving to and from Waimea town to the shoreline. The simple redesignation of land use on the map would fulfill a plethora of recommendations, strategies, and desired outcomes across a number of action plans including: The 2005 County of Hawai'i General Plan, the 2008 South Kohala Community Development Plan, the 2011 Wai'ula'ula Watershed Management Plan, the 2017 State Strategic Plan for Transit-Oriented Development, the 2021 Hawai'i 2050 Sustainability Plan, the 2021 HTA Hawai'i Island Destination Management Action Plan, and the 2023 County of Hawai'i Draft General P	37
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Watershed Management Plan, the 2017 State Strategic Plan for Transit-Oriented Development, the 2021 Hawai'i 2050 Sustainability Plan, the 2021 HTA Hawai'i Island Destination Management Action Plan, and the 2023 County of Hawai'i Draft General Plan	
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Waimea-raised, Waikoloa residing. I see a huge benefit to designating a swath of land on either side of the Wai'ula'ula, Waikoloa, Keanu'i'omanō streams & tributaries as conservation/recreation/natural (whichever most appropriate) in order to protect the riparian corridor. With this designation, community groups may be able to restore and enhance this natural corridor. The streamside area could become an adequate buffer for: managing stormwater, reducing pollutant loads from current levels, protecting from property loss due to flooding and erosion, and creating healthy habitat for native aquatic species. With partnerships the corridor could also become a pathway for safe multimodal, zero emission, transportation options as an alternative from driving to and from Waimea town to the shoreline. The simple redesignation of land use on the map would fulfill a plethora of recommendations, strategies, and desired outcomes across a number of action plans including: The 2005 County of Hawai'i General Plan, the 2008 South Kohala Community Development Plan, the 2011 Wai'ula'ula Watershed Management Plan, the 2017 State Strategic Plan for Transit-Oriented Development, the 2021 Hawai'i 2050 Sustainability Plan, the 2021 HTA Hawai'i Island Destination Management Action Plan, and the 2023 County of Hawai'i Draft General Plan. Thank you.	37
Please designate a swath of land on either side of the Wai'ula'ula, Waikoloa, Keanu'i'omanō streams & tributaries as conservation/recreation/natural (whichever most appropriate) in order to protect the riparian corridor. With this designation, community groups may be able to restore and enhance this natural corridor. The streamside area could become an adequate buffer for: managing stormwater, reducing pollutant loads from current levels, protecting from property loss due to flooding and erosion, and creating healthy habitat for native aquatic species. With partnerships the corridor could also become a pathway for safe multimodal, zero emission,	37

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2.Allow/encourage a water taxi service from cruise ships at Hilo Harbor, with the ocean side of a cruise ship having a floating dock and stairway. Only outrigger canoes would be used, with canoe clubs charging a standard amount and allowed to keep a cut of the profits for their income. The route from the cruise ship would be to the Hilo Hawaiian Hotel area dock (to visit Coconut Island/Queen Liliuoukalani Gardens), to Suisan dock, to a dock between Wailoa Center and the Kamehameha statue. If the canal is deep enough (need dredging?), a final dock between Bayside Texaco and the County Building. An optional smaller craft might offer rides from there to the Ponahawai Street end of the canal, with a small dock there that can handle occasional flood waters. --- Tourists would be encouraged to shop and sightsee thru downtown and end up at a floating dock in Wailuku River (along the concrete wall) near the Daylum corner, for a ride back to the cruise ship	50
Have a new Hilo bayfront highway design pre-approved and ready to implement if the next tsunami destroys the current bayfront highway. Curve the new highway more inland so that the famous but hidden black sand beach reappears, from the lighthouse to Wailoa River mouth. Put in lots of parking, but not too close to the black sand areas. The new curve perhaps could be from the lighthouse to curve inland just after Mooheau bandstand and merge into Kamehameha Ave. --- A unique huge black sand beach might attract tourists.	30
Designate a swath of land on either side of the Wai'ula'ula, Waikoloa, Keanu'i'omanō streams & tributaries as conservation/recreation/natural (whichever most appropriate) in order to protect the riparian corridor. With this designation, community groups may be able to restore and enhance this natural corridor. The streamside area could become an adequate buffer for: managing stormwater, reducing pollutant loads from current levels, protecting from property loss due to flooding and erosion, and creating healthy habitat for native aquatic species. With partnerships the corridor could also become a pathway for safe multimodal, zero emission, transportation options as an alternative from driving to and from Waimea town to the shoreline. The simple redesignation of land use on the map would fulfill a plethora of recommendations, strategies, and desired outcomes across a number of action plans including: The 2005 County of Hawai'i General Plan, the 2008 South Kohala Community Development Plan, the 2011 Wai'ula'ula Watershed Management Plan, the 2017 State Strategic Plan for Transit-Oriented Development, the 2021 Hawai'i 2050 Sustainability Plan, the 2021 HTA Hawai'i Island Destination Management Action Plan, and the 2023 County of Hawai'i Draft General Plan.	36
We need clear and exact definitions of the minimum number of public parking spaces. Currently resorts make this very prohibitive to the public by limiting spaces and access hours. Gate guards feel empowered to turn away the public even with available parking due to holiday crowding of their own resort guests. The rules are not defined clearly enough, nor is enforcement or punishment clear enough.	50
Maintaining and expanding Road infrastructure in concert with the other policies outline in section 8 should be explicitly called out. As density in urban area increases there has to be planning and investment in roads to reduce congestion and insure safety. As a point of reference Waikoloa is rapidly expanding the kind of development described in section 8 but supporting road infrastructure is not being addressed.	48
be careful of FEMA> are they in our best interests? OUR ISLAND makes its own choices.	31
WATCH those taxes. Make sure the moneys go to our Island.	29
NEW IDEA Get all our funding back into our Island. Divorce from the STATE- keep our money here adn let them drown in their own mess.	27

Designate a swath of land on either side of the Wai'ula'ula, Waikoloa, Keanu'i'omanō streams & tributaries as conservation/recreation/natural (whichever most appropriate) in order to protect the riparian corridor. With this designation, community groups may be able to restore and enhance this natural corridor. The streamside area could become an adequate buffer for: managing stormwater, reducing pollutant loads from current levels, protecting from property loss due to flooding and erosion, and creating healthy habitat for native aquatic species. With partnerships the corridor could also become a pathway for safe multimodal, zero emission, transportation options as an alternative from driving to and from Waimea town to the shoreline. The simple redesignation of land use on the map would fulfill a plethora of recommendations, strategies, and desired outcomes across a number of action plans including: The 2005 County of Hawai'i General Plan, the 2008 South Kohala Community Development Plan, the 2011 Wai'ula'ula Watershed Management Plan, the 2017 State Strategic Plan for Transit-Oriented Development, the 2021 Hawai'i 2050 Sustainability Plan, the 2021 HTA Hawai'i Island Destination Management Action Plan, and the 2023 County of Hawai'i Draft General Plan.	37
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In reference to the prior comment, you should also define or describe, elsewhere in the document, what is multimodal infrastructure - what does this entail,	30
Let's make this trail happen! It would be a game changer for exercising in the "Goldilocks" climate zone between hot Kawaihae and cold Waimea.	37
Designate a swath of land on both sides of the Wai'ula'ula, Waikoloa, Keanu'i'omanō streams & tributaries as conservation/recreation/natural (whichever most appropriate) in order to protect the riparian corridor. With this designation, community groups may be able to restore and enhance this natural corridor. The streamside area could become an adequate buffer for: providing a green space with native plantings which will act as a fire deterrent, managing stormwater, reducing pollutant loads from current levels, protecting from property loss due to flooding and erosion, and creating healthy habitat for native aquatic species. With partnerships	37

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This needs to be more specific. How about requiring quarterly bulldozing of firebreaks and brush clearing in known areas of risk such as Kohala Estates (where I reside)? Our Fire Dept should be required to incorporate preventive strategies throughout the year, not just when a fire occurs. Also There should semi-annual hazard reports outlining what maintenance preventive action has been completed. Hi risk communities should all be a a code system (red, yellow green etc.) to alert residents of mitigation status and needs. Burden is currently on individuals and this plan needs to completely SHIFT that to a community responsibility so we do not end up with a Maui mess.	30
Designate a swath of land on either side of the Wai'ula'ula, Waikoloa, Keanu'i'omanō streams & tributaries as conservation/recreation/natural (whichever most appropriate) in order to protect the riparian corridor. With this designation, community groups may be able to restore and enhance this natural corridor. The streamside area could become an adequate buffer for: managing stormwater, reducing pollutant loads from current levels, protecting from property loss due to flooding and erosion, and creating healthy habitat for native aquatic species. With partnerships the corridor could also become a pathway for safe multimodal, zero emission, transportation options as an alternative from driving to and from Waimea town to the shoreline. The simple redesignation of land use on the map would fulfill a plethora of recommendations, strategies, and desired outcomes across a number of action plans including: The 2005 County of Hawai'i General Plan, the 2008 South Kohala Community Development Plan, the 2011 Wai'ula'ula Watershed Management Plan, the 2017 State Strategic Plan for Transit-Oriented Development, the 2021 Hawai'i 2050 Sustainability Plan, the 2021 HTA Hawai'i Island Destination Management Action Plan, and the 2023 County of Hawai'i Draft General P	36
Aloha, our growing community really needs this trail extension to the ocean. Please designate a swath of land on either side of the Wai'ula'ula, Waikoloa, Keanu'i'omanō streams & tributaries as conservation/recreation/natural (whichever most appropriate) in order to protect the riparian corridor. With this designation, community groups may be able to restore and enhance this natural corridor. The streamside area could become an adequate buffer for: managing stormwater, reducing pollutant loads from current levels, protecting from property loss due to flooding and erosion, and creating healthy habitat for native aquatic species. With partnerships the corridor could also become a pathway for safe multimodal, zero emission, transportation options as an alternative from driving to and from Waimea town to the shoreline. The simple redesignation of land use on the map would fulfill a plethora of recommendations, strategies, and desired outcomes across a number of action plans including: The 2005 County of Hawai'i General Plan, the 2008 South Kohala Community Development Plan, the 2011 Wai'ula'ula Watershed Management Plan, the 2017 State Strategic Plan for Transit-Oriented Development, the 2021 Hawai'i 2050 Sustainability Plan, the 2021 HTA Hawai'i Island Destination Management Action Plan, and the 2023 County of Hawai'i Draft General Plan.	36
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Please consider to designate a swath of land on either side of the Wai'ula'ula, Waikoloa, Keanu'i'omanō streams & tributaries as conservation/recreation/natural (whichever most appropriate) in order to protect the riparian corridor. With this designation, community groups may be able to restore and enhance this natural corridor. The streamside area could become an adequate buffer for: managing stormwater, reducing pollutant loads from current levels, protecting from property loss due to flooding and erosion, and creating healthy habitat for native aquatic species. With partnerships the corridor could also become a pathway for safe multimodal, zero emission, transportation options as an alternative from driving to and from Waimea town to the shoreline. The simple redesignation of land use on the map would fulfill a plethora of recommendations, strategies, and desired outcomes across a number of action plans including: The 2005 County of Hawai'i General Plan, the 2008 South Kohala Community Development Plan, the 2011 Wai'ula'ula Watershed Management Plan, the 2017 State Strategic Plan for Transit-Oriented Development, the 2021 Hawai'i 2050 Sustainability Plan, the 2021 HTA Hawai'i Island Destination Management Action Plan, and the 2023 County of Hawai'i Draft General Plan	37
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mine ended up in the ocean too- not where I wanted it to.	37
Designate a swath of land on either side of the Wai'ula'ula, Waikoloa, Keanu'i'omanō streams & tributaries as conservation/recreation/natural (whichever most appropriate) in order to protect the riparian corridor. With this designation, community groups may be able to restore and enhance this natural corridor. The streamside area could become an adequate buffer for: managing stormwater, reducing pollutant loads from current levels, protecting from property loss due to flooding and erosion, and creating healthy habitat for native aquatic species. With partnerships the corridor could also become a pathway for safe multimodal, zero emission, transportation options as an alternative from driving to and from Waimea town to the shoreline. The simple redesignation of land use on the map would fulfill a plethora of recommendations, strategies, and desired outcomes across a number of action plans including: The 2005 County of Hawai'i General Plan, the 2008 South Kohala Community Development Plan, the 2011 Wai'ula'ula Watershed Management Plan, the 2017 State Strategic Plan for Transit-Oriented Development, the 2021 Hawai'i 2050 Sustainability Plan, the 2021 HTA Hawai'i Island Destination Management Action Plan, and the 2023 County of Hawai'i Draft General Plan	37
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I'm not sure how my comment ended up in the ocean. It should be here, along the streams west of Waimea.	37
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We want to express strong support for this concept but it is unclear how it will be applied practically. Infill rezonings are critical, especially with the County's apparent choice in the Zoning Code Update to retain exclusive single-family residential zoning, which makes up 98% plus of residentially zoned land. Rezoning is extremely difficult because they are expensive, time-consuming, and controversial. In the ongoing absence of the entitlement by right in the RS district to build two, or three or four units, a concept that has been embraced in California, Oregon, Washington and elsewhere - the County needs to encourage and facilitate infill rezoning projects, perhaps even find a way to subsidize or sponsor them. Nearly all housing growth in the last decades in Hilo has been 1970s-style subdivisions on the edge of the urban growth areas. In Puna, it has been within large-lot, sprawling, sub-standard subdivisions. On the Hamakua coast, luxurious hobby farms on estate-sized lots have proliferated. These are the polar opposite of smart growth. But there is powerful inertia to continue the same, especially with the primacy of single-family exclusive residential zoning in both the schemes and dreams of the private sector and the regulatory grip of the public sector.	48
6.1 Ensure there is necessary and adequate on-site infrastructure for development projects, including complete streets and multi-modal infrastructure.	30
Process for granting Ag workers accommodations need to be more streamlined	63
Develop managed retreat plans for extreme risk areas.	30
Develop plans for managed retreat for extreme risk areas.	31
Services should be provided by the developer to reduce, reuse and recycle wastes during construction and renovation activities, as well as resulting from typical residential or commercial operations.	29
Projects to increase density need to be designed with a goal of minimizing life cycle impacts and integrating innovative ways to meet community needs for transportation, food, water, waste management, health and social well-being.	27
to reinforce what is stated elsewhere, the following should be added to Objective 6.1:, including complete streets and multi-modal infrastructure to promote safe pedestrian and bicycle use.	29
Consider establishing a Wildfire overlay similar to the suggested coastal zone overlay	31
Designate a swath of land on either side of the Wai'ula'ula, Waikoloa, Keanu'i'omanō streams & tributaries as conservation/ recreation/natural (whichever most appropriate) in order to protect	37

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To what extent shall impact be minimized and how is this determined? Should these specific projects be reviewed by the Planning Commissions to provide greater community feedback on the potential impact? Maybe it would be best if projects consider rezoning to properly mirror the extent of development and fall within the appropriate tax bracket.	63
North Kohala needs to, and intends to, update the zoning categories in our area, particularly regarding Rural vs. Agricultural. This initiative is in progress.	36
Oops!!!! Misspelled Lanikaula Street. Sorry.	45
I disagree with the designation of commercial/industrial zoning of the northeastern side of Lanikaiuala Street from current residential zoning. Hilo needs to preserve residential housing zones.	45
Consider establishing, as one type of overlay zone, a "Coastal Interface Zone" where the integration of all coastal needs and hazards are addressed with policies, standards, and action priorities. This would cover recognition of off-shore activities and the "launching/entry points" for such, including support facilities for such, e.g., parking, restrooms, access paths, and building setbacks, all in addition to tsunami and floodway identification and safety standards.	31
A Policy to simply review a policy is not a Policy. "It's our policy to review our policies." Huh? Drop 7.2. It would seem the others listed here say what needs to be said.	30
Give one example of how "efficiencies" would accomplish this. The problem is arbitrariness in the unwritten and/or "Oh, by the way..." "Memo" policies decreed by certain Department heads and un-decreed or amended by successor heads, and areas of vagueness in certain Rules, especially PC Rules relating to SMA and shoreline setbacks therein. Efficiency has nothing to do with clarity and reliability as to standards of review and decision-making.	30
The County's typical, standard practice of imposing extraneous burdens (such as taking losses on housing costs) upon people (developers) implementing the General Plan by building stuff where the GP says it should or could be built is really backwards thinking that has consumed this County for too long. Instead, "ensuring" affordable housing should be the task of the County's elected leaders to accomplish in any and every possible way vs. whacking those implementing the growth policies of the County. There are a myriad of economical ways of doing so, most of which require dropping unnecessary, dreamworld-level requirements in Zoning, Building and Subdivision Codes, as well as sequential rather than scatter-shot infrastructure portions.	30
This is very significant and something I don't think the island is prepared for in terms of elderly residential development and health care. This should be added to the challenges with a related opportunity - such as removing barriers to affordable elderly residential development, incentivizing elderly residential development, considering a TOD that has ample elderly residential housing	25
Even though it is called out in Section 9 of this document, I think there should be a call out here that visitors are looking for farm stays and eco-stay accommodation types - Farmers are also looking to grow their agriculture businesses to include farm-stays as a way to make ends meet. This was highlighted by numerous farmers with the introduction of Bill 121.	25

Ideally residents of the districts will have a strong voice via their CDPs...but some are more than 15 years old and some districts never got one.	47
What is the purpose of this Priority Action?	64
Reconsider "Shall"	64
Reconsider "require"	63
Should there be a policy to support this flexibility?	60
Reconsider "Shall"	51
Replace "and balance" with "by balancing"	51
Replace "goals" with "environment"	50
Replace "Do not allow" with "Discourage"	50
Reconsider "shall"	50
Reconsider "shall"	50
Replace "shall" with "should" Comment: There may be industrial uses in isolated areas involving energy or new emerging industries	50
need to review criteria	49
Replace "Shall" with "should"	49
Replace "shall" with "should"	49
Replace "shall" with "Should"	49
Replace "shall" with "should"	48
Need to be more specific, as it could be viewed as a taking.	30
Add in " within high-risk hazard areas" after "density"	30
Replace "Proposed discretionary permits for" with "Encourage Proposed" Replace "should" with "to"	29
Add in "Or recommend, as appropriate," after "require" Comment: Must define these corridors before implementing this requirement. Note that most discretionary permits issued by Commissions.	29
Underground is almost always practical, but rarely "Feasible" outside of resorts and urban core.	28
Add in "Support revisions to" in front of zoning Replace "Shall" with "that" Comment: Consider "should" Language "shall" requirement will be difficult to implement and enforce.	28
Add in "such as Lodges, Retreats, or Bed and Breakfasts," after "accommodations"	60
V designation in Rural Areas should only be available for Lodges, Retreats, Bed and Breakfast accommodations and not apply to RS, single-family residential or RM, multi-family residential development.	60
I wonder if there is a need to consider a code amendment that makes a distinction between "workforce housing" and "affordable housing"? The Governor referred to workforce housing as "gap housing" and with the current reality of market-priced housing, it may be time to develop new standards to address the "gap".	58
viii. Require increased standards for the inclusion of affordable and workforce housing within "mixed-use zones".	51
Add in "including Transit-Oriented Development (TOD) and Traditional Neighborhood Design (TND) " after "mixed-use zones"	51
Industrial 8.41 Areas zoned for Light/Service Industrial Districts should not be permitted to include retail commercial enterprises. Lower development standards (such as reduced requirements for parking as well as permitted warehouse-style construction) for Light/Service	50

Industrial Districts can offer lower commercial rents. However, locating retail/commercial businesses in these Districts takes away from the economic sustainability of our Commercial Centers weakening the ability of these areas to offer a lively and robust economic environment.	
8.52 Require the preservation of open and natural spaces within existing and future Resort Nodes.	51
8.50 Encourage the addition of workforce housing opportunities within existing Resort Nodes. 8.51 Require the addition of workforce housing opportunities within new or expanded Resort Nodes.	51
Add in "including within the Resort Node of Keauhou." after Ali'i Drive	50
8.30 Discourage the development of new strip malls.	50
8.19 Require the inclusion of affordable, workforce, and elderly housing within designated High Density and Medium Density Urban Centers. 8.20 Discretionary permit applications for new high-density residential developments adjacent to or within existing light industrial designated lands shall be reviewed for the criteria of conversion of industrial lands. 8.20 Make available water to meet the requirements of new high-density urban development. 8.21 Prevent the development of additional transient residential development in high-density and medium-density residential zones. 8.22 Require new development within High-Density Urban Centers to be built within an integrated, "mixed-use zone".	49
Replace "existing" with "designated" (Note: The use of the word "designated" can encompass existing and future urban centers).	48
Replace "and can support additional residential densities when situated near UGAs." with "but may not be appropriate for additional residential densities due to distances from urban infrastructure, services, and places of employment."	34
Large developments of low-density homes sites should not be approved as "rural". ½ to 1-acre house lots should be approved only as an addition to an existing rural village. Large parcels of land provided with ½, 1, or 2-acre zoning are, in reality, low-density urban development.	33
Situated outside of urban growth areas. Except where noted, these areas should retain their rural character with low-density residential development, supporting small-scale commercial development, and agricultural land uses. Rural areas should not be targeted with the development of major public infrastructure or the extension of public sewer service except where a documented health, safety, and/or welfare condition warrants such an expansion. (1/2-to-5-acre lot sizes)	33
I am suggesting a new Land Use Designation named, Transit Oriented Development (TOD). In some areas of urban land currently, undeveloped land is now designated as High-Density Urban or Medium Density Urban, instead, it would be designated as "TOD Node". This would "put the horse before the cart". Otherwise, currently, land designated as High-Density Urban has the potential to be carved up into several urban spot zones, lacking a vision for comprehensive urban planning and infrastructure.	33
Add in "TOD and TND" after Create	29
Add in "affordable, workforce, and elderly" after Remove barriers to:	27
Add in "as well as approve code amendments to encourage increased residential density within mixed-use medium and high-density urban districts." after utilities	27
In Table 6: Urban Land Use, I suggest adding TOD and TND to the list of "possible zoning designations" since it is the stated intent of the General Plan (see page 46) to adopt zoning policies for these designations.	33
Since the adoption of the County's first General Plan in 1971, the primary advancements in planning at the County level have provided a "spot zoning" system that addresses improved onsite construction and development standards required through the Zoning Code, Subdivision Code, and Functional Plans. There is a concern that the General Plan and the Community Development Plans lack the authority to actually implement well-meaning sustainable planning	24

strategies and therefore we will continue to approve development that is not in the best interest of Hawai'i Island, the residents, the environment, or the economy. We have only just begun to acknowledge the government's responsibility in providing comprehensive sustainable planning for the most basic infrastructure including interconnected systems for multi-modal transportation, water delivery, and sewage treatment. But we are still a long way from the implementation. Until we have caught up with our deficiency in providing services and infrastructure within our Urban and Rural Centers, no major development should be approved outside of these population centers. It is time to begin discouraging the development of additional low-density single-family developments especially outside of urban boundaries. There is evidence that single-family zoning has damaged the environment by encouraging suburban sprawl and car reliance, worsened affordability by restricting housing supply, and undermined inclusion by keeping lower-income households out.	
Remove 7.1 Change 7.2 to 7.1- Add in "landslides, erosion, sea level rise, wildfires, volcanoes," after high surf change 7.3 to 7.2- Replace consider with "Minimize impacts of" Add in 7.3 Enact additional land use and building structure regulations in areas vulnerable to severe damage due to natural hazards.	30
Add in "beaches," in front of shoreline	29
Replace Encourage developers of with "Require" Add in "unless it is infeasible" after underground	28
You really think someone wants to live next to a highway?	47
What is a "progressive" land use strategy? The sentence reads fine without the word "progressive." But since the word is there, exactly what does it mean?	28
See landscape comment under Table 11 above.	61
See landscape comment in Table 11 above.	54
See landscape comment in Table 11 above.	53
Why the qualifier "appropriate"? Street tree/landscape codes need to be updated along with appropriate county agency/department capability as street trees and landscaping is part of good design from a holistic planning perspective - environmental, social/cultural/psychological. It is a quality of life issue that Hawaii County has long neglected.	52
Too vague. Define appropriate.	51
Need to define equitable public access facilities. Currently resort design public access facilities to deter easy public access. Limited parking regulated by guards and distantly located from the shoreline or recreational amenity without adequate facilities are the current norm. Ensure the standards for public access are improved accordingly.	50
It should be noted that industrial areas around the island such as north of Kailua town and in Hilo became defacto "mixed" industrial/commercial areas because of it is cheaper to build commercial retail space in industrial warehouse type buildings in industrial zones bypassing the other requirements such as parking, landscaping, etc. At both Hilo and Kona these defacto hybrid areas due to the proximity to harbors and airports and adjacent urban centers they have become the "gateway" first impressions of our tourist visitors.	50
Agreed. Policies like this one is indicative of a framework that has created the many challenges we currently face. Stick to the proven principles of "smart growth" starting with the locational siting, network connectivity and on down to finer grain. Many of our plantation towns around the island reflect "smart growth" principles.	49
Per Priority Actions 5a, 7b, 7c, create Land Use designation(s) for "Sensitive Lands" (Environmental, Cultural, Hazard) that are protected by restrictions.	34
Are we assuming that there already is or will be zoning code for setbacks for coastal cliffs/palis? Besides safety of adequate setbacks along cliffs, also consider scenic view impacts. Scenic quality is continually being degraded as more development is sited on the edge of cliffs along the coast	31

and other inland palis. Ensure protections against these incursions. NOTE: Waipio and other valleys.	
See my comment in 5.2 above.	29
Rather than waiting for applicants to apply for permit and rely on Planning Director discretion, opt instead for integrated regional overlays that identify environmentally/culturally sensitive corridors i.e. drainage, wildlife, riparian/coastal, scenic for designation as protected zones in which limited improvements like trails, pedestrian, recreational and interpretive amenities would be desired. Partnerships between public and private sector could implement these desired corridors improvements.	29
Should be part of the CDP implementation actions. Need to get funded in County budget across relevant departments as an INTEGRATED effort not the current siloed modus operandi. Increase in house capacity.	28
Agreed. Much of our zoning and subdivision code, including our land use maps are what got us to where we are now. Mechanisms like variances and PUDs are used as exceptions to the current status quo. Suggest overhaul of current system to mandate what is desired i.e. performance based; form based code which specifically show what is desired - integrated development that is environmentally sound, protects open space, higher density/affordable, street networks with multi-modality and connectivity, etc. Basic smart growth principles in both urban and rural contexts that are appropriate to our island.	28
Homes should be built with safety and comfort in mind, but not to the extent of building homes cold or very hot climates. Codes are too restrictive and drive up costs considerably.	26
While the State law and our GP specifically call for preserving scenic beauty and protecting scenic resources, we do not have any analysis and data bases for what those critical scenic resources i.e. viewshed, etc. are, specifically from the public domain i.e. state and county major highway rights of ways, public parks, etc. Instead we rely on after the scenic quality is compromised and it is too late. Do not rely on viewshed mitigation as protection of scenic resources as it is a band aid. Initiate scenic resource inventory identifying critical scenic viewsheds and corridors for protection/preservation. Then put in place scenic quality overlays within GP and CDPs with related regulatory measures to preserve and protect these resources.	28
Property tax policy is one of the main contributors to loss of agricultural lands	27
No, too burdensome. Annual is too much. I live in a legally designated AFD, and provide annual tax return info on Fed and State filings as to my production sales. If the intent is to "crack down" on non-compliers, such filings won't suffice anyway, as "not particularly accurate" as submitted by non-compliers; periodic site inspections will still be necessary. The RP Tax office is having to deal with this now, following the recent changes to the "ag use dedication" provisions. Instead, consider an efficient way of teaming info and inspections with RP tax office.	63
Not necessary; already being done via "Additional Farm Dwelling Agreements" and "Farm Worker Housing Agreements" which specify such off-site work locations and encumber those off-sites in the recorded agreements.	63
No, not unless it's a "program" that will limit the spread and extent of this added use into rural areas. And I'm pretty sure this not the intent, more likely to facilitate expanding it, administrative permits or special permits applications pointing to this "Priority Action."	63
Can you explain what the intention is behind this proposed limitation? Seems counter-intuitive as written...	63
Are these "points of interest" where the GP wants to sanction nearby "vacation rentals" places that we residents enjoy visiting from time to time? And thus going to find more and more crowded out, like our west side beaches where we can hardly find parking spaces and places on the beach to spread out without being a couple arms lengths from tourists on every side of us? And near loved hiking trails, like Polulu-Honokane Valleys trail? Auwe, already! Pau, dat.	63

Please explain how visitor accommodations "DIRECTLY" support agricultural activity. Other than to subsidize operational costs by introducing more road traffic, more dwellings, and more niele (nosing around) visiting people into deeply rural areas. As written, this is a primary point that will be used to actually promote the spread of "vacation rentals" into every corner of our island, all so that individual property owners "can make a buck" that they say they can't make by doing what they committed to doing.	63
It would be helpful and instructive for this purpose to explain, with examples or otherwise, what aspects of "productive agriculture" uses are asserted to need buffering from any/all(?) other uses including open space, urban uses or whatever. If this is about machinery noise, or odors, or beliefs of pesticide toxin drifts or percolation into nearby streams, be specific and say so, so that any encouraged/arm-twisted buffer zones are objectively tied to specific issues. And that way, specific buffer zone depths can be objectively proposed and considered. As written, this just sets up problems.	63
Please provide justification for the ML inclusion. If you're going allow residential use there, and still profess Smart Growth principles, you'll have to allow grocery/convenience stores and consumer service shops, too. Otherwise you're undermining S.G. (and you probably are if allowing residential in ML anyway, regardless of any added limitations).	51
Maybe this heading should be changed to something more general about the visitor industry, so that it includes visitors staying in small urban hotels in the various districts and also "vacation rentals." "Resorts" as a GP focus was essential in the 1970s - 1990s. Now, it's a matured industry here in acreage and locations given contemporary shifts to residential infiltration.	50
This is pretty much moot (new resort areas) in this era, given the sanctioned diaspora of visitor growth into our residential and agricultural neighborhoods.	50
"Resort USES, VISITOR ATTRACTIONS and all related types of development shall be in areas..." This would embrace "vacation rentals" perforating our residential and agricultural communities, as well as sometimes obnoxious visitor attractions in rural areas.	50
"Economic, environmental and social desires of the residents..." This supports careful sanctioning of the "transient accommodations" industry as a whole, and embraces "vacation rentals" in residential areas zoned for residential and agricultural uses.	50
"or with buildings within 500 feet of the existing shoreline"	50
An example would be much-needed development of a WEST Hawaii geothermal well on the upper slopes of Hualalai (where the resource has been scientifically evidenced to be highly viable).	50
This is "same old, same old" carte blanche for "whatever" after typical pick and choose from these lists of objective and policies. Either eliminate this back-door "blessing" for Special Permits, or add it to Policy 8.30 above so it's that, has "clear" (?) community benefit AND there are unique resource acquisition or delivery factors that justify this major deviation from principles.	50
insert: "regional-scaled industrial..." We need to allow for small scale uses at sub-town area locations, e.g., farm and appliance repairs, self-storage facilities for household items, etc.	50
add: "in accordance with adopted CDP plans identifying such potential transitions."	50
"unique industrial resource sites where a defined, limited scale of adjoining industrial use development is necessary to use that resource for community benefit." This kind of language would be appropriate for CONSIDERING geothermal well development, for example.	50
"reviewed FOR the criteria...?" This sentence says nothing, really. Do you want to say, "Conversion of existing industrial use lands to commercial uses shall be evaluated as to compatibility with existing or planning TOD/TND urban areas?"	49
Wow, this is completely undermining Smart Growth principles to continue allowing such, unless they are to be located in carefully considered "Special Districts" at the immediate periphery of the TOD. These are major traffic impactors, and "buffers" are meaningless other than noise or order	49

issues, which should only be a consideration AFTER meeting the Smart Growth locational principles that maintain core densities and interconnective efficiencies of all types.	
Add: "...in accordance with Smart Growth placement and phasing principles."	49
This is the tail wagging the dog from a long-range planning standpoint. It should be worded in reverse: "Encourage development of affordable housing near commercial uses focused on consumer goods and services." While recreational opportunities are relevant to the housing, it's not relevant to the instant topic of "Commercial." I recommend deleting this policy and placing the above suggested policy in a residential policy section.	49
why say "oversized?" Be clear, and say something more like, "New subdivisions comprise blocks that are generally not more than 600 feet long, separated by appropriately sized/scaled vehicular and pedestrian circulation ways, as determined by the subdivision's location in the surrounding area's land uses or planned land uses."	49
There's no reason I can think of for a planning document to not use the proper word here instead of "larger types," that word is "arterials."	49
This sentence is literally gibberish. I think you mean to say, "Support (but how??) master planning by private landowners and public institutions which emphasizes"	48
This is a "how" policy; I suggest relocating this to the Objective above about increasing public participation.	48
Given all the other principles and policies of the GP, why single out development proposals using these monikers for special treatment? Historically, this becomes prone to abuse in the form of "spot zoning" and thus more sprawl. This should be deleted as at best unnecessary and more likely as being counter-productive to the GP goals and objectives.	48
"And as prioritized by the applicable CDP."	48
Only if those existing facilities are located in or adjacent/near to designated urban growth centers. For example, promoting multi-family densities out by the Kona airport, just because there's a "University Center" toehold out there, would be bad planning, i.e., contrary to Smart Growth principles as to the critically important inter-connectivity needed with the urban core(s), and further increase all the negative of sprawl (highway traffic, police and fire and school commuting, etc.)	48
Forcing this focus to be only in places where the higher densities can "maintain existing character" is logically impossible. Instead of tossing out crumbs to appease, just say it: e.g., "and where it can enhance equitable, economically viable growth in existing communities" or the like.	48
Unfortunately, this could work against "Smart Growth" principles by reducing demand for new buildings in synergistic urban centers that collectively are needed to make "Smart Growth" work. Maintaining poor locations - more so with government incentives to do so - maintains urban inefficiencies sought by Smart Growth. Consider deleting this policy, or narrowing it to apply primarily to sites WITHIN targeted TOD/TND cores and immediate peripheries.	48
Add: "The regional CDPs are to provide specific growth area priority locations within the GP mapped areas for urban growth, and to include the sequencing of such growth locations concurrently with the needed infrastructure elements within the larger GP-designated areas" or similar. This gives context to the existing statement and which points all parties to the regional CDPs for specific guidance as to priorities and the reasons for such.	47
As our 20+ year General Plan, it looks nonsensical to designate the very north end of the Urban Growth area for "medium density urban" use, in concurrent user/occupancy competition with other designated site abutting or very close to the established urban core surrounding Kailua. The GP map doesn't have sanction/ratify existing zoning, as is properly explained at the top of this section. So even though the Palamanui site holds valid conditional zoning, from a GP perspective of seeking orderly, cost-effective (to the community not to the developer) urbanization/growth, promoting it as a preferred use at the outlying boundary of the growth area doesn't look like good planning! More pointedly: we need those housing units closer to the urban core in order to	38

achieve the goal matrix of affordable transit, housing, recreational facilities access, etc. - not more and more and more sprawl over the 200+ years it will take (based on statistical building permit volumes) to have this north Kona planning area approach the use levels suggested here.	
Given that we have the islands ONLY landfill here, and that it nominally includes a recycling center area within it, shouldn't it be identified on the LUPAG Map? Otherwise, this map pretends this key, islandwide facility and it's cross-island and regional traffic impacts don't exist.	37
It's already illegal (impossible to get a permit for) to build a house of the quality that our parents and grandparents safely raised us and supported their own lives, all in the name of "safety." Funny, I think my parents, grandparents, I and siblings never felt endangered in these now illegal ("nonconforming") dwelling units. None of the added specifications in the last few decades are "cost effective" for families who can't afford to have a house because of them. Our policy is, effectively, "sleep in your cars, or double/triple up with friends or relatives in their substandard (nonconforming) houses, because we, the County, decree that it's too dangerous for all of us for you to build a house like you grew up in, or are doubling up in." So, no, maybe change this to say, "re-evaluate the Building Code mandates to reduce dwelling construction costs where statistically found to be reasonably safe to do so."	31
Please explain, if meaning other than moving urban uses significantly inland. What are some examples of "natural features" that don't depend on upland relocations?	31
"Re-imagine our coastal corridors as shorelines are predicted to be 100 years from now and adopt a coastal corridor "special area plan" that will guide necessary (yes, necessary) downzonings to open space and infrastructural relocations inland in conjunction with more public and private open space recreational area in the shoreline-proximal portion of the coastal corridor in and between urban areas.	30
Delete "intensive". Discourage ANY development in Lava Hazard Zones 1 and 2 that would result in encouraging additional infill/occupancies on existing hazard-prone lots.	30
So this would restore the Director's privilege which was yanked away by the Council 5 or so years ago after judicial intervention overturning an admin. permit. If this Action is to be retained here, I suggest stating that an Administrative Hearing being required, just as is required for Department Rule adoptions/changes, so that neighboring residents can publicly at least express any concerns or refinements. PUD approvals are increasingly controversial due to many of them being essentially "infill" of our existing checkerboard-like sprawl patterns in our various north and west region communities.	30
This "Action" has nothing to do with equitable planning and decision-making processes and should be relocated. However, if to retained in this document, such a process should be via the Planning Commission and not at the mere discretion of a sitting Planning Director.	30
If the County actually wants to "increase" equitable planning, it might add a policy point here that CDP Action Committees will be solicited for their input on equitable practices and standards most appropriate within their respective planning areas.	30
All three of these Policies are already in practice, as Council policy or as Code requirements. Your heading says "Increase.." Although "equitable" is already implicit in this document from your first page on, and doesn't need to be repeated constantly because there are no standards for such, if to be used here, I suggest the objective being "ENSURE equitable planning..." because none of these point increases anything.	30
Consider proposed that cluster developments be mandatory per Code amendments except in specified low lot-count subdivisions with small acreage (should be studied; might be 2, 3 or 5 acres for exemption) which parcel was not created by "parceling" techniques used to bypass this clustering requirement.	29
Yes, good idea. I suggest it be an "Overlay (Zoning) District" that may be effected in any zoning district and any LUD except, perhaps, Conservation for jurisdictional reasons.	29

Way too vague to be anything more than a great hindrance. First, there is no "reuse" of household water per DOH standards without expensive processing. Second, there is no recharge feasible that is R-1 standard as fully "clean/safe" water for ocean or land creatures, and septic systems employ transpiration (evaporation) via leach fields for a large percentage of water used. Catchment systems are problematic in health safety, reliability and long term maintenance. Recent hydrological studies, as summarized at HLPC's June '23 "Water Summit", show that this island has vast untapped lower lenses (aquifer layers) at a mere additional 1,000 feet or so in the east and west studied regions of our island, so the value of pursuing this objective is questionable.	29
Delete "drainage," instead "existing and future open space or recreational corridors where these uses are determined to be compatible with corridor objectives."	29
When later actually doing such feasibility/practicality study, I suggest taking two - or a max of three - specific sub-regions within 2 or 3 CDP planning areas, and compose the study as 2 - 3 sub-studies of how much density would actually be desired for transfer into study-specified urban planning centroids (one mile diameter, half-mile radii), and how much of that theoretically desired removal of vested density isn't actually needed or worthwhile to ensure on-site protection, management, and perhaps agro-forestry cultivation in the targeted "open space." Also, be specific as to the theoretically desired low density level to be achieved: Is one farm dwelling per five acres too dense (in conjunction with new site use rules/limits in the open space zone)? The State's Keahole Agricultural park is that: one dwelling per five acres of productive agriculture. For identified open space targets for which TDRs are to be used which do NOT have a specific site objective of keeping such space "completely" open (such as floodways, key viewsheds, and specific cultural features), and which are currently zoned A-5a, A-20a, A-40a, TDRs may not be necessary to both retain open space and guide such open space into specific agro-forestry or recreational uses via Zoning Code use amendments creating "Open Space District Overlays" with the desired "tweaking" of uses desired and discouraged or prohibited.	29
Make that "Systematically Implement County-initiated State LUD amendments for urban growth areas specifically identified and delineated in the regional CDPs according to reclassification sequencing also specified in adopted CDPs (yes, none of the current six CDPs prioritize or even contemplate sequencing, so implementing this would have to follow the 5-years-overdue "updates" to at least the first four CDPs).	29
If it's in a NEW urban area, compatibility/character maintenance is irrelevant, or moot. This is a good objective-oriented that belongs under a different objective relevant to desired urban forms. When it IS relocated, I suggest stating that - as policy - it should be generally required (not merely encouraged) in all Urban Land Use Districts, except where regional transmission lines are necessary and overhead placement is specifically justified and county-approved (Council Resolution) in the urban areas.	28
Please explain how this platitude pertains to preservation of community character/compatibility. Regardless of the merits of underground power/communication lines, most existing communities are served by overhead power/comm lines, if not internally, then to the edge of their developments. I think this belongs in a different topic area. (and where it DOES get shifted to, it should say "encouraged generally, and coupled with substantial wildfire protections in open lands."	28
Instead of just "supporting" these mechanisms, why not step out and say that the Zoning Code should be updated to require that clustering is a basic requirement of ALL subdivisions creating houselots and multi-family development lots (one or both), with exceptions for a small number of lots or small-sized lots in locations deemed by the Director according to subdivision and landownership patterns to not be "parceled" into such small sizes and different ownerships in order to avoid this requirement.	28
Whether by PUD permit or via a future re-write of the Codes' Variance approval standards, community character alone must not be the stated justification. If the existing community is substandard in important infrastructural ways, expanding that substandard situation just for reasons of "compatibility" would be wrong.	28

Variances should never be "encouraged." Per (existing) Codes, they cannot be used for community character consideration (which PUDs deviations from Codes CAN be based upon), only individual, objective hardship or unique circumstances. To "stretch" the uniqueness aspect to embrace a Director's opinion of community character will destroy the integrity of current Variance standards.	28
These four items have little or nothing to do with "Public Engagement" (PE). PE, in the context of "Land Use Opportunities" in this sub-section, would be things like: "Support public engagement with the six CDP Action Committees as the primary venues for group and individual input on the CDP concepts, priorities, implementation methods, and aspects that could or should be changed or improved." The Action Committees are the perfect venues for the County's airing of all specific land use methodologies, priorities and proposed exceptions from time to time.	27
I don't see how any of these four items are "Market Conditions." Market conditions would logically mean elements such as availability of resources for various land use types (e.g, building materials, infrastructure materials) at economically feasible prices; interest rates; the diaspora/dispersion of visitor (transient accomm.) units into residential area and the economic/taxable benefits vs. the destructions of neighborhood characters; and the supply of "sugar daddy" mega-millionaires having dwellings on our western coastline. THOSE are "market conditions!"	27
Our county has not demonstrated adherence to sound urban growth practices, and should NOT be given further carte blanche to urbanize rural and agricultural lands. Once we have adopted standards that will stop our many-decades-long practice of approving disparate urban sprawl developments of every time (commercial, recreational, religious, educational centers (schools), etc) and once the County requires comportment with CDP development specification that - unlike now in ANY CDP - specific the desired/intended sequential growth and development sectors within its region and sub-regions. Since none of the CDPs specify sequencing of identified growth areas/types in their planning areas, the CDPs will have to be properly updated to include sequencing, and which must be based on the identified growth volumes and rates in each CDP planning area. At growth volumes of 100 - 400 dwelling units/yr. in each the six CDP areas, subjected to a sequencing plan for most such growth locations, a broader stroke of powers delegated from State LUC could be justified and supported.	27
The term "targeted areas" should be narrowed down. The GP is way too general a doc/plan to accurately identify all the specific areas in each region, and even sub-region, that should be "targeted" (I suggest "prioritized") for urban expansion; that's the role of the six County CDPs. This item should say "one or several targeted areas prioritized in each of the County's CDPs, as appropriate for expected or intended population growth in each CDP planning area." With less than 1,000 dwelling units/year permitted in the entire county for the 13 years from 2007-2020 (U.S. Census), and thus implying a likely range of 100 - 400 dwelling units in each our six CDP planning areas (northern and southern CDP Planning areas being more rural with less growth numbers), simple analyses will show that infrastructure commitments by the County must be very, very, very carefully targeted, incremented and step-funded in order to provide "bang for the buck" if not basic feasibility.	27
As long as such "flexibility" does not reduce the certainty of the required infrastructure elements being provided by "date certain" or a specific occupancy-usage amount (or volume). Ensuring "certainty" might be possible with pre-approved and effective Community Facilities Financing Districts (just one example) where the RPT-link improvement assessments were automatically triggered at the threshold occupancy/volume level. Mere completion bonds are not secure enough. Oceanside 1250 (Ika Hokuli'a) proved that fallibility, and the extreme hassles it took/will take to obtain ultimate performance.	27
It's time we go past this hackneyed phrase of public-private partnerships solving our development problems by being more specific. E.G., "FACILITATE P-P partnerships through carefully planned incremental, sequential expansion of infrastructure elements and zoning rights from existing urban centers, and which contemplate and employ incremental use and expansions of	27

"Community Facilities Financing Districts" as a standardized, predictable means of effecting orderly growth and P-Ps at the same time."	
ADU expansion concept could be based facilitating ADUs on parcels where no additional septic systems are needed for such (e.g., 5 bedroom max rule) and no additional water meter is required, e.g. if the main dwelling unit has no more than 3 bedroom per DOH determination standards (which includes "dens" as bedrooms) and the permissible ADU is limited in size to perhaps 4-500 sq.ft., on the premise that such d.u., with the ADU, will still draw only the average amount of water per day.	27
Although many existing residential areas use cesspools for wastewater, focusing ADU expansion in residential areas will improve the economics for the property owner when mandatory wastewater system upgrades are effective (in 2050).	27
Are these the "Functional Plans" identified in the Intro section? If so, please state as such; if not, please explain what the difference is between this and the "Functional Plans."	27
Add: "in the traditional policy framework that ignores the shared public expenses of infrastructure and public support services including police, fire/rescue, and domestic support services."	26
NIMBYism is greatly lessened by having a CDP that is fairly specific as to what uses and at what densities can go where, based on what infrastructure standards being met concurrently or prior. Kona's and Puna's CDPs go part way there , but fail to provide specific enough pictures/image concepts as to what it would look and be like in density on land and roads, and also fail to suggest specific sequencings, or ordering of urbanization/densification sites. Thus, what happens when and where is essentially a crapshoot for every existing neighborhood, and a "why HERE now, and what about this and that infrastructure impact?" NIMBYism is getting what we deserve for the loopy-goopy planning initiatives/approvals that worked in a different cultural and density era.	26
THE major, overarching Land Use Challenge is in confining most new development to areas in and around existing major urban centers, where it can be effected in predetermined incremental directions and also with density increases within those urban centers. Doing so will incur the electoral wrath of the landed sprawl-makers ("developers"), but actually lessen almost all of the other Challenges listed here.	26
au contraire. The very fact that the County is comfortable making piecemeal land use density changes into urban here and there, on shaky, bible-thumping quality rationales, is instead reason why the legislature out to reduce the County-allowable jurisdiction of these urban-oriented "boundary amendments" to be even less in acreage. Instead, the Challenge here is for the County to refocus its rezoning eligibility standards on progressive, incremental growth and densification to existing urban centers, through proper large area upzoning linked lock-step to concurrent, or specifically sequential infrastructural development and thus eliminating the current "sprawl" approach to approving both public and private developments (this includes locations of public/private schools, hospitals, homeless "shelters," and residential pseudo-towns.	26
there are areas in Waiakea Uka where one lot might be designate rural and the next lot over might be designated low density urban. Do we want to make this more uniform so that the entire street and all properties have the same designation?	45
extend the Hilo urban area into the houselots to allow for higher density. the area is well served by existing infrastructure and will provide additional options for urban development.	45
Get serious about promoting infill and connecting it to public transportation. Change zoning, promote ADUs, and get serious about "complete streets" that are friendly to walking, biking, etc.	27
Encouraging County utilities to partner with private facilities and operators in areas where existing infrastructure is located.	27
Redefine what adequate is - changing codes to allow (permit) innovative wastewater technology and encouraging ADUs on small farms can have a dramatic positive impact on generating additional affordable units.	27

It is not possible to get a mortgage in Lava zone 1 & 2 - this means the most affordable area of the Big Island is only open to cash buyers. County should offer a lending option to encourage rural residential areas.	26
Update building codes to reflect our climate. Do not force people to have the same type of structures as places with high snow loads, its not necessary.	26
What about digital nomads? How many people live here but work remotely? Is this a good model for future growth - no commuting, less greenhouse gases, etc. but we NEED telecommunications infrastructure.	25
Allowing visitor accomodations on farms in Puna is essentially to keeping people on their land and retaining the rural nature of the area. This also increases food security for the island as many small farmers trade, sell or provide a great deal of their own food.	25
This is super interesting and should be a driver of decision making. Connected communities are important for aging in place.	25
Keeping the communities rural should be a high priority. Stop sub-divisions if possible, if not demand they put in water and wastewater infrastructure BEFORE they can sell any lots.	25
might this limit successful add value or other enterprise associated with agriculture?	63
can these be reduced, there is a lot of recreational area already on the island	57
What about for ag tourism or similar activities?	49
Many resorts have created their own infrastructure, will this bar new development and not allow the Resort to install their own systems?	50
Rethinking of zoning is needed. Multi family living must be integrated so young people can stay on the island to work and afford living. Tiny home communities , permitted Ohanas or trailer parks are necessary to lower the cost of housing for the next generations wether in urban or rural zones. Those developments need to provide a safe environment for future families.	25
"Encouragement" is an insufficient response to wildfire risk. This document contains a plethora of specific policy recommendations and priorities related to sea level rise and water / watershed management. Fire risk should be treated similarly. For example, at the intersection of Urban Land Use designations and High Fire Risk there should be specific policies and prioritized projects for development, implementation and funded maintenance of fire mitigation capabilities in those communities.	31
The WAIKOLOA area (map 2) contains the single largest designation of Urban Expansion Land Use on the entire Island. What rationale was used to reach this determination and how has the existing community been included in reaching this result?	37
and with special consideration given to smoothing the path for manufactured or component-manufactured housing. Eliminate the barriers in current building code on these.	49
we need more light industrial - we are maxed out.	38
Yeah, I am confused by the intent here too	30
Encourage innovative, cost effective housing approaches via an expedited permitting process	27
and incentivize infill development. If the continuing barriers to land use boundary changes remain, as they probably will, infill development becomes the primary tool to increase the availability of housing. Remove barriers to ADU's, provide incentives directing development to existing urban areas.	27
contain "and encourage" development where sensible. The GP should also promote development where it makes sense to do so	24
Or rooster farms	64
Improve tourism first impression by creating a lovely visual at the cruise ship ports	63
How about certified commercial kitchens availability especially for value added products	63

?restoration can be interpreted in more than one way	63
?earth toned exteriors??? Who picked those colors??? Too restrictive	61
This seems vague	57
Consider locating EMS/fire substation near industrial parks to help in event of industrial fire/trauma/injuries	55
You could utilize stand alone emergency rooms in areas without a hospital. They can quickly stabilize patients and transfer to larger/higher level of care as needed. Placed on multiple acres sites that may or may not also have birthing centers. In future, they could expand to smaller hospitals.	52
What if an old resort on ali'i goes out of business? Is this comment limiting future refurbishment by another developer?	50
Also need to rehab the hilo port area to make it much more welcoming to tourists to attract more tourist return visits or recommendations from them to others to come.	50
Without detracting from the beauty of the harbor. Encourage industrial/commercial areas to create a green buffer of plantings to obscure ugly views	50
In my world TOD=time of death. Perhaps write out what tod stands for. Not everyone knows your acronyms.	48
Could we offer incentives to businesses willing to rehab an older building? Or if county owned, sell or lease the building to a person or business at reduced rates to increase use/occupancy and slow down urban decay.	48
What about the smaller lots in Nanawale and Ainaloa???	33
Also educate public re decreasing fire risks around their homes	31
Also discourage increased development along shorelines due to increased threat of storm surge with hurricanes/tsunami.	30
Consider whether the current roads from years ago would be able to handle people trying to escape tsunami/volcanic episodes.	30
Or wind.	30
This section sounds vague. Why incremental zoning? For whom?	30
While encouraging xeric gardening is a great idea, I sincerely doubt that people will conserve their water use. For example the resorts are going to want watered grass/gardens to make them more attractive to tourists. Build a desalination plant. That will create additional water for use. It will also create jobs. Salt could be packaged for sales to culinary aficionados and tourists.	29
The electrical infrastructure by utilities especially on the dry side of island should be underground, especially in light of possible increasing areas of drought and fire risk.	28
Consider rezoning the smaller acreage lots like Nanawale or Ainaloa as residential (not just for tax purposes.	27
Great idea	27
Same as with environmental assessments, why would a repeat cultural impact assessment be done? Why is an a first cultural practitioner's assessment not considered final if that person is an acceptable cultural practitioner ???	27
? Appropriate? Which area is not appropriate for residential development???	27
Do we place liens on properties with unpaid taxes? Are we foreclosing if unpaid taxes persist?	27
Ensure that permitting is time/date stamped when submitted as are requests for necessary inspections. Oversight of permitting should be done. There should be no conflicts of interest by any county employee in permitting. How are we ensuring that our permitting is NOT corrupt like Oahu?	27

In areas that are already developed can they expand vertically? That would support some of the need for affordable housing at a perhaps reduced cost.	27
Development here is also delayed by repeated Environmental Assessments. Why are we requiring repeat EA's if one is already completed for the same use in the past? Who is benefiting from these?	26
See if Hawaiians can be offered lower interest rates on mortgages. Perhaps they could be allowed lower down payment. Also, consider whether mortgage lengths could be extended as the 15 and 30 year mortgages were developed years ago. People now live longer. Maybe mortgage lengths could be 40 or 50 years?	26
Take the time for code to be reviewed and inconsistencies resolved. Also, update code based on current knowledge of construction in tropical and hurricane prone/flood prone areas.	26
Also, if the county is planning future roundabouts make sure there are 2 full lanes around. The Ainaloa roundabout is so small tractor trailers are just cutting straight across the circle of pavement in the middle.	26
We need to seriously increase manufacturing. Perhaps economic/tax incentives to industry willing to start up here.	25
There is a great need for affordable housing for single parents with children. Also, housing units with ADA compliance for elders are needed.	25
Rezoning of infill vacant land from ag designations to residential designations should be streamlined so that projects can move ahead without roadblocks. It would be best the the land has automatic redesignation options.	49
Zoning changes needed to allow more multi-family opportunities in Puna	24
If possible, add average driving distances from residences to employment sites by job sector/type.	25
It might increase understanding of these sector numbers if you also group employment by major sectors, those being: Government (ideally broken out by Fed, State and County) including military; Manufacturing and Processing (foods and whatever); Agricultural production and wholesaling/distribution; and Services (medical, education, retailing, and all professional services). This would give a much better idea of our workforce's make-up. And ideally, compared with some national averages just for perspective.	25
I suggest we can all understand this situation and trend better if we recognize that all hotel units, timeshared condominium apartments and single-family residential vacation rentals are "transient accommodations" (T-A). Just three broad classes as I mention here. This will help everyone understand that what's changing is the T-A density and amenity-group modes in the T-A industry here in Hawaii (and elsewhere, of course), and facilitate objective discussions about the mix of impacts that differ from these three classes: Impacts on shared infrastructure (e.g., road traffic, public beach parking and beach space) and on the neighborhoods of our long-term residents. "Destination Resorts" as envisioned in the 1970s-90s were supposed to avoid burdening local residents use of roads and beaches, and have no neighborhood impacts at all. We need to squarely identify and address that evolution in proposing a GP approach to guiding T-As into the decades ahead.	25
Look at and think carefully about the definition of "overcrowding" used for U.S. Census purposes and embedded here. A continental U.S. standard of more than 1 person per room in a household being "overcrowded" is cultural definition that doesn't fit well with Hawaii's extended family cultures (Asian and Polynesian especially, to a lesser degree Latino). Collectivist cultures seem to work around immediate, live-together and/or live-next-door housing fabrics. We act to hobble those critically-supportive cultures by creating housing locations (e.g., remote Waikoloa Village) that rip extended families apart all in the name of "affordable housing." We also do that "only one kitchen/dwelling" zoning code limitations, as extended families needed more than one "kitchen" as broadly captured in the zoning code definition. Point is: It's OK to quote this "continental U.S.	25

cultural standard" but only if we also recognize, and perhaps even celebrate, our own cultural patterns that are comfortable (overall, always exceptions) with "more than one person per room" in a household, such as auntie and uncle, and grandparents as well as a couple's children.	
This statistic is false. Births and deaths alone do not define net population growth/decline. In fact, it's irrelevant in places such as ours where there is substantial in-migration and out-migration. For this type of data set to have any value at all, it would have to be expressly limited to births from long-term residents (5+ years, perhaps?) and deaths of long-term residents; that would at least provide a view of the change in at least somewhat "kama'aina" population members. In-migrants giving birth shortly after arriving, or dying in just a few years after arriving, skew that data to make it irrelevant. It would be meaningful/insightful if the data were to identify changes in RESIDENT population (according to official residency standards) and do so by classification: birth, death, and in-migration residency change.	25
Designate a swath of land on either side of the Wai'ula'ula, Waikoloa, Keanu'i'omanō streams & tributaries as conservation/recreation/natural (whichever most appropriate) in order to protect the riparian corridor. With this designation, community groups may be able to restore and enhance this natural corridor. The streamside area could become an adequate buffer for: managing stormwater, reducing pollutant loads from current levels, protecting from property loss due to flooding and erosion, and creating healthy habitat for native aquatic species. With partnerships the corridor could also become a pathway for safe multimodal, zero emission, transportation options as an alternative from driving to and from Waimea town to the shoreline. The simple redesignation of land use on the map would fulfill a plethora of recommendations, strategies, and desired outcomes across a number of action plans including: The 2005 County of Hawai'i General Plan, the 2008 South Kohala Community Development Plan, the 2011 Wai'ula'ula Watershed Management Plan, the 2017 State Strategic Plan for Transit-Oriented Development, the 2021 Hawai'i 2050 Sustainability Plan, the 2021 HTA Hawai'i Island Destination Management Action Plan, and the 2023 County of Hawai'i Draft General Plan.	36
As quietly coordinated between landholders, corporations, contractors, unions, and real estate agents (the donor class), with help from politicians (the often corrupt and criminal class).	24
[Sustainable development is an oxymoron used to greenwash corporate profit-taking under the guise of economic development.]	24
By promoting agriculture based communities around shared infrastructure and growing food to minimize the need for jobs we will create livable neighborhoods that minimize energy requirements, encourage healthy activity, enhance social interaction and mental health.	24
Sustaining development opportunities for investors is vital to maintain the donor base of contractors, developers, and real estate agents for local politicians.	24
Provide housing for underpaid teachers and nurses by creating more small Airbnb units.	27
Giving the least among us the most worthless of properties is not a winning solution. Provide people with homes and arable land. They and the land will thrive.	27
This is the problem, approaching land as something to be used, exploited as an opportunity for development. Land needs to be nurtured and protected so that it will sustain. Develop around that idea.	27
Huh?	27
Capitalize kanaka to build their own new homes on their own arable lands that were previously stolen from their ancestors.	27
Capitalize small locally owned businesses instead of spending our capital on global corporations.	27
Designate a swath of land on either side of the Wai'ula'ula, Waikoloa, Keanu'i'omanō streams & tributaries as conservation/recreation/natural (whichever most appropriate) in order to protect the riparian corridor. With this designation, community groups may be able to restore and enhance this natural corridor. The streamside area could become an adequate buffer for: managing stormwater, reducing pollutant loads from current levels, protecting from property loss	37

due to flooding and erosion, and creating healthy habitat for native aquatic species. With partnerships the corridor could also become a pathway for safe multimodal, zero emission, transportation options as an alternative from driving to and from Waimea town to the shoreline. The simple redesignation of land use on the map would fulfill a plethora of recommendations, strategies, and desired outcomes across a number of action plans including: The 2005 County of Hawai'i General Plan, the 2008 South Kohala Community Development Plan, the 2011 Wai'ula'ula Watershed Management Plan, the 2017 State Strategic Plan for Transit-Oriented Development, the 2021 Hawai'i 2050 Sustainability Plan, & the 2021 HTA Hawai'i Island Destination Management Action Plan.	
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Isn't it just development of recycling operations whether cottage or otherwise? Why call out just one option?	50
Do you want to discourage it or not allow it?	49
'developing' new urban areas	47
What are the known street names of 192 and 198?	38
do you mean density in high-hazard areas?	30
Consider natural and man-made hazards	30
Get rid of 'that would be'	30
Are we asking to ensure there are requirements or actual affordable housing for employees?	30
The definition of natural systems planning is a good one shown only when you click on it. Although it could use an example (e.g. watershed). How will anyone knows what it means in a printed document?	29
Get rid of comma after "issues"	29
Get rid of comma after 'of' and before 'issues'	29
Require, not encourage	28
Get rid of the comma after variances	28
How do you "ensure proper land use patterns"? Shouldn't it be "develop proper land use patterns" or something?	27
Doesn't this bullet belong under Land Use Compatibility rather than Public Engagement?	27
What does this mean? Just say it.	27
Doesn't the term capital stack refer to existing and proposed funding streams? It's not something you seek and pursue.	27
SHPD has no existing standards?	27
Get rid of "that"	27
As long as it's the infrastructure and not the concurrency where there is more flexibility	27

Please state why this is true.	26
If this is a known problem then fix it.	26
Bldg code req'ts keep people safe. If they need to be modified for a tropical env't then do so.	26
Why not? This isn't rocket science.	26
Should this say "existing" low infrastructure capacity? Absent a qualifier it's open to interpretation.	26
How can North Kona have both the lowest percentage of affordable housing and 23% of the island's affordable housing?	25
The use of Rural designated lands to present day character and lifestyle. Instead of: Maximize the alignment and use of Rural designated lands to preserve rural character and lifestyle Productive agriculture lands under the advisement and guidance of Research and Development for the future sustainability. Instead of: Support the active use of Productive Agricultural lands.	24
There should be a tax allowance for fallow ag lands. The land is more productive over time when the land is left unmaintained for a period of time. It also lowers the level of pesticide contamination on that land and water tables and ocean.	63
Support community character and equitable land use. Instead "Maintain community character and land use compatibility". Community Planning and Decision making instead of Increase equitable planning and decision making processes. Hold accountable to those threats of life and property from hazards and disasters. HRS	24
I live in Captain Cook where there is 24/7 heavy vog conditions. My home is on a cliff that is directly facing high voltage transmission lines. The lines are approximately 75 feet from my home. The lines have a larger than normal radiance because of the vog particles which lie heavy in South Kona. As a result, I have become extremely sensitive to everything electronic or magnetic. What can the County do for me as well as people who are in similar situations?	28
"Natural Systems Planning" needs to be defined in order to be implementable.	24
Do what the General Plan articulates. Follow through with what the GP is articulating. The County is full of BS. In the Planning Department, there should be more reality. What the GP is proposing is unrealistic. We need to adopt indigenous best practices that have been proven overtime for generations. Dont use "Smart Growth" it should be written as "viable growth" Be more authentic/more real.	24
Hazard mitigation needs to include addressing the risks imposed by improper land use within a designated land use. For example, open space used to have minor hazardous risks associated with its use, now street people camps have caused and continue to cause hazardous risks with open spaces with camp fires, drug use and sanitation. Please include street people nonconforming land uses in hazardous risk planning for public resources.	30
I don't understand what this means or is intended to address, please explain.	30
After Maui fire, we should also include retro opportunities as well, ie, find opportunities to relocate existing overhead powerlines under ground.	28
Development of underutilized government property is actually public property, the government may hold title but its really public lands. So what we're saying is to make unused public lands available for affordable housing which is public housing ? Which is fine especially in a high density urban area if those public resources are actually self supporting. Self supporting such as paying for utilities and maintaining grounds. If occupants can't make rental payments, they should work to maintain the properties. Credit from completing work assignments or rent payment. Please lets not just give away crash houses for downtown druggys, that will not support our existing community.	27
I presume this means promote short term rentals on Ag zoned properties. It seems to me that is open to discussion and may need to have stipulations.	63
Industrial Uses should not be sited adjacent to residential community.	50

Drop the restrictive adjective "native" in front of the term forestry. Foresters in HI know that true forestry has to acknowledge the necessary role play by nonnative trees. Obviously, no one wants to add invasive plants to our existing inventory of such species. But our prime forestry trees - 'Ohi'a and Koa -- are both subject to lethal diseases at low elevations. As a result, carefully vetted use of nonnatives is necessary for successful forestry.	63
Add "forestry" to the definition of "agricultural uses" when defining "open spaces." The term suggests fields of grass or low-height crops such as vegetables.	63
This seemingly innocuous statement should be reevaluated for inclusion in the GP. "Buffer zone" or "compatible" use is likely to be used by residential land users as a hostile rebuff to ag land users. Should my rights as an ag land user be restricted, for example, by not permitting me to properly use pesticides on my crops because adjacent residentially-zoned land users object? Should I not be allowed to grow windbreak trees because an adjacent resident claims their view is "blocked"? Don't open this Pandora's box without careful protection on nonresidential land users.	63
The GP should explicitly add forestry to the desired developments of ag land. Forestry is an ag land use that is not often perceived as such. And yet it provides a variety of ag products such as wood, fruit, nuts, pollinator habitat, prevention of soil erosion, water retention during drought, and wind abatement, amongst other benefits.	63
Bad idea. Subjective terminology ("major public road" -- in Hamakua, any road with pavement is a major road). My point is that any focused restrictions on a specific form of agriculture in ag-zoned land is the opening of a Pandora's Box. We went thru this with the attempt at rooster restrictions in Puna some years back. Ag suffers enough from factors such as high land prices that local sons/daughters of HI can't afford, as well as unapologetic use of ag land by wealthy mainland transplants for view estates. To enact further ag restrictions is an open giveaway to those who would rather promote residential uses of ag land than... ag uses.	64
Quote a source? How is this shift being measured and how is the environmental impact being observed?	25
If Hawai'i island was successful in building sustainable live-work-play communities and minimizing commutes with affordable housing, wouldn't this likely change?	25
Believe more specific language is needed to describe the nature of the required access. Access to a public road for any of these commercial facilities should not be via a private easement unless that use is specifically allowed in the easement grant. Furthermore, in the case of a private road access, there should be a road maintenance agreement calling for these roads to be constructed and maintained to appropriate county standards. Similar prerequisites should be in place for other uses with similar traffic impacts. The motivation is to reduce the private landowner burdens.	57
The bottom of Palani Rd. at Anne K. HWY is the perfect area for condo's and apartments for hard working people who earn their living in Kailua Kona. This area is close to town allowing folks to walk or bike to work if sidewalks were installed. How about some housing for folks who are not low income but also not wealthy? What about our blue collar working class folks? We need more apartments close to town not up on Hlana Lani where far away from town, and jobs.	38
se add homeless/street people to this list of population growth statistics. Please describe what a "shelter burden household" is.	27
Rising insurance costs for development in high risk areas (lava or flood inundation, wildfire, etc) is also hampering housing's financing and affordability	26
We need an alternative building code if the goal is affordable housing. As a long time builder in Hawaii I feel that the current limitations by the county building code is the biggest hinderance to building more affordably. Not everyone needs to or wants to live in boxes. Try thinking out of the box with some exempted communities on a trial bases that take more responsibility for the safety of the structures they build. Learn from it and keep what works before trying the next one. You have to start somewhere, again there are thousands of examples of alternatives building on this island already. Some work better than other and some may not be compatible at all, but people	58

have found ways to live and build for less already. It may not benefit contractors or unions but is is much more "affordable" if that is the goal, getting people onto the land without bankrupting them.	
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