

From: [DHHL.Planning](#)
To: [WPCtestimony](#)
Cc: [maileluuwai@gmail.com](#); [MAHA INC](#); [Cachola, Julie-Ann](#); [Makaila, Lilliane K](#); [Jeremiah, Bryan E](#); [Watson, Kali](#); [Michael Kaleikini](#); [Makai Freitas - HHC](#)
Subject: DHHL testimony on Hawaii County General Plan Update to County Windward Planning Commission
Date: Tuesday, March 11, 2025 4:42:59 PM
Attachments: [DHHL Testimony to Windward Planning Commission Re General Plan Update March 2025.pdf](#)
[PO-24-032 DHHL Comments to HI County 2045 General Plan.pdf](#)

To whom it may concern,

Please find attached DHHL testimony on the County of Hawaii 2045 General Plan Update.

Should you have any questions, please contact [dhhl.planning@hawaii.gov](mailto:dhdl.planning@hawaii.gov) .

Mahalo for the opportunity to provide testimony on this matter.

JOSH GREEN, M.D.
GOVERNOR
STATE OF HAWAII
*Ke Kia 'āina o ka Moku 'āina 'o
Hawai'i*

SYLVIA J. LUKE
LT. GOVERNOR
STATE OF HAWAII
*Ka Hope Kia 'āina o ka Moku 'āina
'o Hawai'i*



KALI WATSON
CHAIRPERSON, HHC
Ka Luna Ho'okele

KATIE L. DUCATT
DEPUTY TO THE CHAIR
Ka Hope Luna Ho'okele

STATE OF HAWAII
DEPARTMENT OF HAWAIIAN HOME LANDS
Ka 'Oihana 'Āina Ho'opulapula Hawai'i
P. O. BOX 1879
HONOLULU, HAWAII 96805

March 12, 2025

County of Hawaii Windward Planning Commission
Aupuni Center, 101 Pauahi Street, Suite 3
Hilo, HI 96720

RE: DHHL Comments on the County of Hawaii 2045 General Plan

Aloha Chair Daniele and Commission Members:

Mahalo for the opportunity to provide comments on the County of Hawaii's General Plan Update. The Department of Hawaiian Home Lands (DHHL) previously offered comments to the County Planning Department regarding the County General Plan Update in February 2024. DHHL stands by those comments previously submitted and we hope that the Planning Commission takes the time to determine whether the County Planning Department adequately addressed DHHL's comments that were articulated in the DHHL February 2024 comment letter.

Given recent discourse at the Planning Commission about roads being proposed through DHHL lands, we would like to re-emphasize DHHL's previous comment (emphasis added):

The County should not be articulating proposed roads through Hawaiian Home Lands in its General Plan without first consulting with DHHL and its beneficiaries. There are several proposed roadway routes depicted on the County's online webmaps on its Konveio website. While DHHL understands that data depicted on these maps are "draft," DHHL would like to emphasize that final County General Plan recommendations should not

depict proposed new roadways through DHHL land without first consulting with DHHL and its beneficiaries.

As you can see from the testimony received over the past two days, inclusion of roads that traverse over DHHL lands without consulting DHHL and its beneficiaries has created unnecessary angst and concern in our beneficiary communities that could have been avoided through outreach and communication with DHHL and its homestead communities.

Further DHHL would like to remind the Planning Commission that the Hawaiian Homes Commission has exclusive land use authority over Hawaiian Home Lands per the Hawaiian Homes Commission Act which has been incorporated into the State Constitution as a condition of Statehood. As such, the Hawaiian Homes Commission would need to approve any long-term use of Hawaiian Home Lands, including the use of Hawaiian Home Lands for roadways. In particular, proposed roads in the General Plan Update that are shown to traverse through DHHL's Panaewa lands and King's Landing lands would directly conflict with DHHL's 2016 Panaewa Regional Plan and DHHL's 2024 King's Landing Homestead Settlement Plan.

Both of these plans were approved by the Hawaiian Homes Commission. It is therefore highly unlikely that the Hawaiian Homes Commission would approve of the road routes that are currently depicted in the County General Plan Update. Inclusion of these road routes in the County General Plan are misleading to the public as these routes are unrealistic given the conflict with the Hawaiian Homes Commission's approved plans for DHHL's lands in Panaewa and King's Landing. Keeping these roadway routes in the County General Plan for the next 20 years will only cause future confusion and unnecessary conflict among members of the public. DHHL echoes previous testifiers' comments to remove such figures from the County General Plan.

Lastly, testimony was recently provided by County officials citing the inclusion of these routes in County the General Plan was due to these routes being identified in the County's Puna Community Development Plan. DHHL believes that is not a sufficient reason to continue to keep these proposed routes in the County General Plan. The geographic scope of a County CDP should be limited to the district in which the CDP relates to and not make recommendations of land uses or CIPs in neighboring districts as residents of the neighboring districts are not involved in that particular CDP outreach process.

The Puna CDP planning process did not consult with DHHL beneficiaries that live in the district of South Hilo. Residents of South Hilo had no say in the roadway routes proposed in the Puna CDP. Conflicts that may arise between CDP areas need to be

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resolved in the County General Plan. As you can see by the testimony provided in the last two days, there is conflict. DHHL asks that you resolve this conflict by directing the Planning Department to remove those figures that depict County proposed roadways that traverse through DHHL's Panaewa and King's Landing lands from the County General Plan.

Mahalo again for providing an opportunity to review and comment on the County 2045 General Plan Update.

Me ke aloha,

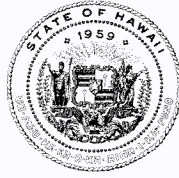
A handwritten signature in black ink, appearing to read 'Andrew H. Choy', with a stylized flourish at the end.

Andrew H. Choy
Planning Program Manager
Department of Hawaiian Home Lands

C: Michael Kaleikini, East Hawaii Hawaiian Homes Commissioner (via email)
Makai Freitas, West Hawaii Hawaiian Homes Commissioner (via email)

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Ref: PO-24-032

February 28, 2024

The Honorable Zendo Kern, Director
County of Hawaii Planning Department
Aupuni Center, 101 Pauahi Street, Suite 3
Hilo, HI 96720

Aloha Director Kern:

RE: DHHL Comments on the County of Hawaii 2045 General Plan

Mahalo for the opportunity to provide comments on the County of Hawaii's General Plan Update. The Department of Hawaiian Home Lands (DHHL) offers the following comments:

1. Recognition and coordination of the Hawaiian Homes Commission (HHC) land use authority with the County's land use authority is memorialized in the 2002 Memorandum of Understanding (MOU) between DHHL and the County. DHHL requests that the County includes this document as either as an appendices to the County General Plan or in separate section of the plan, where appropriate, to ensure that there is a reference for current and future County staff, elected officials, and members of the public about the relationship between DHHL and the County. The MOU between the County and DHHL was created almost a quarter century ago and while DHHL knows that current County Planning Department staff are aware of the MOU and the unique status of the Hawaiian Homes Commission's land use authority over DHHL lands, DHHL wants to further ensure that future County staff future elected officials, and future members of the public continue to have an institutional memory of the relationship between DHHL and the County. Incorporating a reference to this document in the 2045 County General Plan Update will better guarantee that this institutional memory is perpetuated in future generations. The 2002 MOU is enclosed for your convenience and reference.

2. Likewise, DHHL requests that its 2022 DHHL General Plan Update be referenced and / or included in the 2045 County General Plan Update either as an appendices or other appropriate section of the County General Plan. The 2022 DHHL General Plan Update identifies land use designations that the HHC may apply to Hawaiian Home Lands. The DHHL General Plan should be a reference to the County. A copy can be found here: <https://dhhl.hawaii.gov/po/general-plan/>

3. The 2045 County General Plan Update should have specific policies that articulate that DHHL Plans (DHHL General Plan, DHHL Hawaii Island Plan, DHHL Regional Plans) will be the authority on land use that will guide County policy regarding land uses and projects surrounding DHHL lands. DHHL beneficiaries have expressed strong concern with County policies or actions that may encourage land uses that are detrimental to homestead communities.

For example, the recently introduced County Council Bill 107 related to an alternate route study for the proposed Puna Bypass Road did not appear to consider DHHL testimony and the testimonies of its beneficiaries to exclude routes from the study that traverse over lands under the jurisdiction of DHHL.

Furthermore, there continues to be harmful uses near DHHL homestead lands, particularly in Hilo, that pose a health and safety issue to our Hilo homestead communities. The County General Plan should emphasize that the County should adopt policies to phase these uses out over time. DHHL does note and appreciates that the County Land Use Pattern Allocation Guide (LUPAG) recommends agriculture-related designations for lands bordering the Panaewa homestead community to the east. DHHL would like the County to strongly consider non-industrial uses in its LUPAG for lands that border DHHL's King's Landing Tract. Those lands are currently being considered for future homesteading and DHHL is currently going through a planning process to settle these lands.

4. DHHL strongly encourages the County to begin its process to develop a County Community Development Plan (CDP) for the South Hilo District. The South Hilo District includes these DHHL homestead communities: Keaukaha, Panaewa, Kaumana, Piipihonua, King's Landing, and the future Honomu Homestead community.

Per the draft 2045 County General Plan Update (page 204), CDPs “translate broad General Plan statements to specific actions, as they apply to specific geographical areas. ***They serve to provide a forum for community input*** to reflect the character of each community.” Further this section of the County General Plan states the purpose of a CDP is threefold:

- Translate the General Plan’s broad statements and community development guidelines to actions specific to the planning area to address regional issues and opportunities.
- Improve and advance communities and community resilience through the acknowledgement and development of community capacity.
- ***Provide a process for citizens to engage in civic dialogue and contribute to the identification of community priorities.***

Beneficiaries have expressed to DHHL that the absence of a South Hilo CDP marginalizes these homestead communities from having a say in land use decisions and government services that impact these homestead communities. Further, without a South Hilo CDP, beneficiaries would like to know how the County intends to incorporate the voices of these homestead communities into County plans, programs, and services for their district. The County 2045 General Plan should address this disparity for the South Hilo district in the implementation section of the General Plan.

5. The County should not be articulating proposed roads through Hawaiian Home Lands in its General Plan without first consulting with DHHL and its beneficiaries. There are several proposed roadway routes depicted on the County’s online webmaps on its Konveio website. While DHHL understands that data depicted on these maps are “draft,” DHHL would like to emphasize that final County General Plan recommendations should not depict proposed new roadways through DHHL land without first consulting with DHHL and its beneficiaries.

6. DHHL appreciates County planners taking the time to meet with DHHL planners over the years as part of the County General Plan update. It appears that most of the LUPAG designations of DHHL lands depicted on the Konveio site are consistent with DHHL land use designations in DHHL’s Hawaii Island Plan. We would like to note that DHHL will be updating its Hawaii Island plan 2024 thru 2025 and will be consulting with its beneficiaries over that time through the update process.

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Should there be any substantive changes to DHHL's land use designations, DHHL will communicate these changes to the County.

7. DHHL is attaching previous DHHL comments on the County General Plan Update that DHHL previously submitted to the County over the years for your reference and consideration.

Mahalo again for providing an opportunity to review and comment on the County of Hawaii 2045 General Plan Update.

Sincerely,

A handwritten signature in black ink, appearing to read "Kali Watson". The signature is fluid and cursive, with the first name "Kali" being more prominent than the last name "Watson".

Kali Watson, Chairman
Hawaiian Homes Commission

cc: Michael Kaleikini, East Hawaii Commissioner (via email)
Makai Freitas, West Hawaii Commissioner (via email)

Enclosures: 2002 MOU between County of Hawaii and DHHL
Prior DHHL comments on County of Hawaii General Plan Update