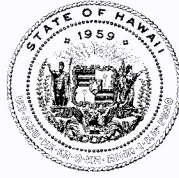


From: [Maile Luuwai](#)
To: [WPCtestimony](#); [LPCtestimony](#)
Subject: Testimony- 2045 General Plan
Date: Tuesday, March 11, 2025 12:28:09 PM
Attachments: [KPFA 2045 General Plan Ltr 03.11.2025.pdf](#)
[DHHL Chair 2045 General Plan Ltr to Planning Dir 02.28.2024.pdf](#)

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

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



KALI WATSON
CHAIRMAN, HHC
Ka Luna Ho'okele

KATIE L. DUCATT
DEPUTY TO THE CHAIRMAN
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

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.

Director Kern
February 28, 2024
Page 4

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 that reads "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



Keaukaha Pana'ewa Farmers Association
P.O. Box 6844
Hilo, HI 96720

VIA EMAIL ON 03.11.2025

March 11, 2025

Jeff Darrow, Director
County of Hawaii Planning Department
Windward & Leeward Planning Commissions
101 Pauahi Street, Suite 3
Hilo, HI 96720

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

Aloha Director Darrow and Planning Commission Members:

Per DHHL Chair Kali Watson's letter to your predecessor on February 28, 2024, we ask that:

1. The County 2002 Memorandum of Understanding (MOU) between DHHL and the County be included 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.
2. The 2022 DHHL General Plan Update be referenced and / or included in the 2045 County General Plan 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 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.
4. The County 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.

5. All new proposed roadways and connector road through DHHL land be removed from the County General Plan. The County should not be articulating proposed roads through Hawaiian Home Lands in its General Plan without first consulting with DHHL and its beneficiaries.

The Keaukaha Pana'ewa Farmers Association (KPFA) is a Hawaiian Homes Commission Act (HHCA) Homestead Association controlled by beneficiaries (as defined by the Hawaiian Home Lands Recovery Act, 109 Stat. 537). KPFA is registered as a Homestead & Beneficiary Association (HBA) with the U.S. Department of the Interior under 43 CFR §§ 47.10 and 48.6.

We represent over 1,500+ native Hawaiian Homestead beneficiaries and their 'ohana residing on Hawaiian Homes Trust Lands in Pana'ewa, Hawai'i Island. Our 285 agricultural lots range from 5 to 40 acres across 1,615 acres of Hawaiian Homes Trust Lands. Our programs also serve our sister residential community of over 1,200+ Native Hawaiians that reside on 311 lots across 411 acres of Hawaiian Home Trust Lands.

Mahalo,



Maile Luuwai
President
Keaukaha Pana'ewa Farmers Association
808.280.883

Sent as a separate attachment:
DHHL Chair 2045 Letter dated February 28, 2024