

Written Testimony: Puna Community Development Plan Action Committee meeting
February 1, 2024

It is the obligation of the several CDP Action Committees to comment with “recommendations toward amendment of the Hawaii County General Plan”. This “Duty and Responsibility” of the Action Committee is specified in Hawaii County Code. I have recently served as Chair of the Hamakua Action Committee and am continuing on as ‘member’.

I have been concerned that the several Action Committees have failed to focus on this process of submitting comments and recommendations toward the revision of the General Plan, and that this reformulation of the Plan may take place without our careful observation. I feel that the Planning Department perhaps should have been channeling our attention toward that responsibility, however, until the last month, their staffing has been severely limited.

Nonetheless, I have been told that the Action Committee Comments will need to adhere to the March 1, 2024 deadline for Public Comment on the Draft Plan. In observing the recent meetings of the several Action Committees I see that most are in a very early stage of developing comment or recommendation. In fact it appears that this deadline will not allow Comment and Recommendation to be developed, discussed and ratified by some of the Committees. The Hamakua Committee has had the advantage of having monthly meetings over the past year. We assigned members various chapters for examination and Comment at our December meeting. We will discuss the 100 or so comments/recommendations/questions that were submitted at our upcoming meeting with (I suppose) voting on each comment at our January and February meetings. This of course means that these Comments will have needed to be studied by the AC members prior to the meetings.

However, it is also the case that Bethany Morrison, Planning Officer in charge of formulation of the Draft GP stated to our Committee that the Action Committees would be able to submit comments and recommendations after the Final Draft GP is formulated and released to the public. Those comments and recommendations would be submitted to the Planning Commission prior to their review of the document and then submitted to the County Council prior to their ratification of the General Plan. Therefore, it would be my judgment that those committees which are not able to develop comments prior to the March 1 deadline should nonetheless continue attention to the General Plan and, particularly after the Final Draft is presented, formulate comments for direction to the Planning Commission and County Council. Thus, I think, the Committees will have opportunity to satisfy the prescribed ‘duty and responsibility’ to offer comments and recommendations on amendment to the General Plan. However, much more efficient and effective if comments were available for submission prior to March 1.

Below are the collected comments and questions and recommendations from the several members of our Hamakua Committee which are on the Agenda for discussion at the Wednesday, January 10 meeting. Some of these comments will be contentious, and most likely a number will be modified or eliminated in our submission to the Planning Department. But at least, those contentious comments and proposals will have had consideration and discussion.

One suggestion that will be added as proposal which is not included in the below commentary would be: “All submissions for subdivision or zoning changes of properties which are received by the Planning Department will have a summary or copy of the submission presented to the Chair of the District Community Development Plan Action Committee in which that property lies, for consideration of placement on the Agenda of a subsequent Committee meeting.” This follows from the County Code 16-6 designation of the Duties and Responsibilities of the Action Committee as:

“(5) Receive briefings, as requested, from the planning department on pending and approved permit applications involving property located within the planning area, and on other issues related to the CDP.” If there is no notification of submissions then there is no likelihood of these applications coming to the attention of the Action Committee.

Tawn Keeney MD

Comments and Questions collected from the Hamakua CDP Action Committee members regarding Draft General Plan 2045 included on the Agenda of the Jan. 10 Hamakua Action Committee meeting as a Communication for discussion and consideration with anticipation of decision making at the February Action Committee meeting.

GENERAL PLAN COMMENTS AND QUESTIONS - HAMAKUA CDP ACTION COMMITTEE

INITIAL CONCEPTUAL COMMENTS REGARDING THE GENERAL PLAN

1. The basic concept underlying the notion of General Plan is desirable. However this current Draft General Plan 2045 raises questions about practical application of that notion. It is found, in survey of the proposals here that the Draft General Plan is laden with contentious ideas which are likely to represent the thinking on one administration but may well be rejected by a subsequent administration, or, more importantly by the general public. If the General Plan is to be posited as a guideline or aspirational document that spans a period of 20+ years then contentious proposals, or proposals that have a shifting or limited source of support or are poorly understood by the public or the administration, should not be a part of the document.
2. Regardless of whether the apologists of placement of contentious proposals in the Draft General Plan attempt to justify this document as a ‘Living Document’, they may also posit it as foundational to the development of ordinances and administrative rules that may subsequently arise.
3. Where there would be significant opposition, even if the document framers should feel themselves in a majority position, the General Plan should be avoided as residence of that directive
4. If a General Plan directive may expect even modest opposition, then that proposal should be accompanied by a full explanation of the reasoning behind its position, as inclusion in the General Plan may become rationale for proposal as ordinance or administrative rule.
5. Does the State of Hawaii or the United States have a ‘General Plan’ that it creates periodically. No, they have constitutions. However these ‘constitutions’ are not given to contentious proposals which arise with the shifting of societal circumstance or environment. They are fundamental guidelines which are truly foundational and not subject to whim of administration. And it is from that document that legal applications arise. There is no intermediate ‘General Plan’, formulated as aspiration by one administration after another, not subject to public debate and discussion
6. If a General Plan is posited by an administration as description of intention of where its aspirations lie, and especially if that Plan contains contentious or poorly understood proposals then that document should be retired at the conclusion of each administration rather than posited as a guidepost for a 20+ year period.
7. And if such a document is of such fundamental importance to construction of societal rules, then its evolution should take place by amendment of the underlying document rather than reconstruction of a new document which allows only incomplete or limited understanding of how that document has transformed from what has proceeded it.
8. If the document is reformulated as transformation rather than edited as transition from currently existing structure, then a full explanation of the rationale for each proposal should be available to the public. Even in the model of transition, an explanation of changes should be available to the public.

9. The above considerations conclude that: A) The General Plan should not contain proposals where agreement will be subject to significant contention. Rather, such proposals or directives must first be considered and endorsed in their individuality. B) A General Plan should have clarity of transition from its predecessor. C) The timeframe of application of the document should be shortened, perhaps as much as to the term of the administration which has generated the document. This shortened timeframe in itself will encourage transition rather than transformation.

PUBLIC UTILITIES - COMMENTS

10. P. 91. Be a net power producer with Hydrogen and Waste Management.

This directive should not be included in the General Plan. It is understood by the administration and much of the Public that the intent to use Hydrogen pervasively as energy storage mechanism, and various waste to energy strategies, whether by burning or a pyrolysis mechanism, are controversial and thus are of questionable propriety in such a 'foundational level' policy document as the General Plan.

In evidence of this controversy I cite a recent Tribune Herald headline, "National Expert Questions County Energy Policy". The expert's comments were directed toward countering proposals for extensive use of hydrogen for energy storage and waste to energy proposals. The County has presented no response of which I am aware to the issues raised in that presentation. Until clarity is given as to how Hydrogen will add to our net power production or storage, and what technology will be embraced in converting waste to energy, placing hydrogen energy paradigms and waste management into County energy policy direction for the 20+ year interval until 2045 is inappropriate.

There is no question that controversy exists over these energy strategies. It is not inappropriate that the current administration would take initiative toward careful examination and even endorsement of a perspective on these strategies. However, before enshrining their perspective as foundation for County policy over a 20 year period, a pedestal that the General Plan offers, that administration must undertake explanation and education of the Public of the desirability of their endorsement. None of this has taken place.

The administration has not explained to the public how Hydrogen will be used in a 'net power' strategy. The inefficiency of Hydrogen fuel cell for vehicular power is well known and is approximated at one-half to one-third the number of vehicular miles traveled per life-cycle energy consumed when compared to battery electric vehicles. A vehicular hydrogen infrastructure would be exceptionally expensive and a commitment which the 2000 Hydrogen vehicles as opposed to over 900,000 electric vehicles (and rapidly becoming less) cannot justify. The inefficiency and infrastructure demands have led to abandonment of the vehicular hydrogen model. Whether Hydrogen should be visualized as back up grid storage, with longer capacity than current battery technology, is questionable and the subject of significant debate, particularly with the advance in battery storage capability. Any 'Green Energy' produced on this island should be applied directly to the grid with battery back up before diverting it to 'storage' in the form of Hydrogen production at a significant loss of efficiency for grid purposes. Producing Hydrogen from, for instance, virtually unlimited geothermal might make sense as an export product, but for grid back up on this island converting 'firm' geothermal energy to Hydrogen would be superfluous as well as inefficient. And geothermal may become a realistic energy resource on all islands. Hydrogen may have certain acknowledged applications in replacement of fossil fuel power such as maritime shipping, fertilizer production, possibly mass transit or trucking, and high heat applications such as foundry or steel production. These applications are in contention also. However, before Hydrogen is

advocated as a basis for societal 'net power production' at the level of directives of the General Plan, the administration should be transparent and vigorous in its explanation to the Public of how this application of Hydrogen's potential will take place, well before its endorsement in the General Plan.

Waste to energy strategies need clarity for the Public also. Perhaps the administration has been convinced of the desirability of a waste conversion strategy involving a pyrolysis process. This has been opaque to the public consequent to a non-disclosure agreement made by the County. However that opacity should preclude this process as being foundation for Waste to Energy commitment enshrined in the General Plan, which should be available to the assent of the Public. If the Waste to Energy commitment in the Draft Plan (I use the term commitment because the General Plan should not be a document of Advocacy) is the more traditional burning of trash (most likely at the Pepeekeo Hu Honua facility) then this needs to be clarified. It is my limited second hand understanding that the Hawaii County Council has twice considered and rejected endorsing proposals of a waste to energy strategy, once in the Kim administration and once in the Keno'i administration. It would not be appropriate to place this in the General Plan if such controversy exists. Its presence there without explanation and justification should lead again to rejection of the Draft Plan by the County Council.

11. P. 91. Pursue financial modifications to provide creative funding for significant expansion of water systems to reach new customers in non-service areas.

Comment: Please describe the financial modifications and creative funding options being suggested here. Unless these are novel ideas there are probably reasons that such ideas have not gained traction.

12. P. 98. Collaborate with government, private and nonprofit agencies, and other stakeholders to remove regulatory barriers and seek funding to complete and improve the islands fiberoptic loop in an environmentally and economically appropriate manner.

Comment: Please describe what regulatory barriers are being suggested for removal.

13, P. 102. Explore the feasibility of incentive methods such as property tax dedications, conservation easements, or transfer of development rights to protect the defined zone of influence of existing or proposed public and private wells.

Comment: Please clarify the meaning of 'zone of influence' of wells. Please give examples of where and how this might be applied. How is the defined zone of influence of existing wells currently protected.

Suggest: Ensure water distribution systems supply community perimeters with water availability to support intensive grazing for the purpose of firebreak and fuel break, or support of agriculture, or evens supporting community gardens for purpose of fire break and fuel break for retarding potential wildfire. Ensure the hardening of those systems against collapse from engulfing wildfire.

14. P.105. The County operates municipal sewerage

Comment: Add Honokaa to the list of county operated municipal sewerage.

15. P. 109. Amend HCC, Section 21-26-1(a) requiring "all sewer extensions shall be approved by resolution f the County Council" to read "all sewer extensions outside of Urban Growth Areas shall be approved by resolution of the County Council"

Comment: Please explain the motivation for removing from the Council's authority the examination and ratification by Resolution the extension of sewer extensions within the Urban Growth Areas. Please submit this proposal to County Council for ratification before placing it in the Draft General Plan.

Comment: Please show a mapping of any changes in Urban Growth Areas on the present Draft General Plan 2045 Land Use Maps from the previous 2005 Land Use Maps

HOUSING

16. P. 146. With an estimated population increase from 202,000 to approximately 273,000 in 2045, a 35% increase, there will be a demand for an additional 17,000 resident housing units over the next 25 years.

Comment: Please describe the County's views of the upsides and the downsides of an increase of 70,000 residents in the next 20 years. Is the only control opportunity of this number the availability of suitable housing?

17. P. 24. 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 "Affordable Housing" according to Office of Housing criteria, whether multi-unit project or individual house or house-site, 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 "affordable housing".

18. P.146. 44% of the population will be over the age of 65 by 2045.

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Q: Does the Planning Department evaluate this for desirability? Again, would this not be an important reason for supporting the limitation of influx of immigrants through available mechanisms such as the proposal above.

19. P. 149 Remove barriers to reduce cost for new construction and rehabilitation of the current housing through changes to tax, zoning and building standard requirements.

Comment: 1) Please give examples of how changes in taxation will reduce the cost of new construction and rehabilitation. 2) Give examples of how changes to zoning will reduce the cost on new construction and rehabilitation. 3) Give examples of how relaxation of building standards will reduce cost of new construction and rehabilitation.

Comment: It is stated above that 90% of growth till 2045 will be through immigration. Does it make sense to reduce taxation, which will benefit the general public, in order to accommodate immigration. Much of the cost of immigrant ownership of housing will be distributed among the current resident population (though some of the cost will be in purchase of offshore materials). Where is the advantage in reducing building costs for this immigrant population of homebuyers. Removal of barriers should only be for the 'affordable housing' component.

20. P. 149. Create subsidies like LIHTC for the missing middle of affordable housing (80% -140% AMI)

Comment: Please Describe the subsidies of LIHTC. Do individuals or families currently making 120% AMI qualify for housing subsidies? Please describe the thinking that an individual or family making 140% of Area Median Income should be able to qualify for Affordable Housing Subsidies. It seems clear that affordable housing projects must become the rule rather than the exception. Housing subsidies up to 140% seems like one method toward this proposal. But then this could be paid for by increased taxation on the total of new housing which would in effect redistribute funding to support affordable housing or perhaps a progressive tax of some kind.

21. P. 149. Encourage resort communities to include onsite workforce housing options.

Q. Why has workforce housing onsite not been a stipulation of Resort Communities up until now. What are the downsides of making this a requirement rather than an encouragement? What is the encouragement which is being proposed here. If it is a requirement, or even if it is just encouragement, will it lead to importation of workforce. Can residency requirement be included? Can public/private incentivization lead to the County building affordable workforce housing on or adjacent to resort property?

22. P. 151. Amend building regulations to allow for as-built permits and new renovation permits for less than 50% of an existing structure to conform with the building code of the year the main structure was permitted, excluding electrical and other critical life safety codes.

Comment: Please explain the meaning of this and the practical impact which it will have.

23. P. 153. Revise financial mechanisms and property tax provisions to allow for creative finance solutions to incentivize new construction and rehabilitation of affordable housing.

Comment: This sounds like it was lifted from a 2007 textbook for Real Estate Lobbyists. Please describe some of the financial mechanism adjustments and property tax provisions that would allow the creative finance solutions referred to.

24. P153. Adopt a County affordable housing program, similar to HRS 201H that encourages development, reduces cost and simplifies permitting.

Comment: HRS 201H is an undisguised blow to the intent of Regulation. The main purpose of planning and a Planning Department is to impose regulation. The County Council should have jurisdiction to weigh the advisability of waiving regulation in the appropriate circumstance regarding Affordable Housing development. Please describe in detail the regulations which have been most commonly superseded by invocation of 201H. In what way would a County 201H similar proposal provide opportunities that HRS 201H itself does not. This proposal appears to be counter to the idea of safeguards to the common good for the benefit of development, and should be abandoned.

Question: Recently two 20 unit housing subdivisions in Honokaa, one affordable and one not affordable, have been passed by Commission and Council and survey begun. When the developer made presentation in Honokaa he indicated that the affordable lots without structures would be priced somewhere around \$300K. By what mechanism does a vacant lot without a structure qualify as 'affordable'.

VISITOR INDUSTRY

25. P. 177 By adopting regenerative practices, our island can not only mitigate the negative effects of tourism but also ensure the long-term wellbeing and resilience of its communities and ecosystems.

General Comments:

1. The emphasis on Regenerative Tourism came as a result to the mounting criticism of the numbers of visitors and intrusion into the social fabric that the numbers of visitors was creating. The numbers of visitors is the basic problem - not that the visitors are disrespectful of the historic and current cultures. The catchphrase of 'Regenerative Tourism' is an effort to divert attention from the real problem of numbers. It is likely that for 90+ % of visitors there has been no change of plans or behavior from before the term 'regenerative tourism' was fabricated. There has been no diminishing of numbers of visitors.
2. By far, the most 'negative effect of tourism' is the associated Greenhouse Gas emissions from air transport of visitors. As we see more and more the social effects of rising temperatures such as climate migration, civil unrest and food shortages and the climate disasters such as fire, flood, hurricanes, sea level rise etc. the more clear it will be that leisure travel must be eliminated. Hawaii tourism, as leisure travel, is perhaps the worst offender on the planet, Hawaii being the most distant archipelago from any inhabited continental land mass.
3. In 2021 I presented a paper to the Honolulu Climate Change Commission indicating that Greenhouse Gas Emissions from air transport of Visitors to Hawaii accounted for 1-1/2x Hawaii's total domestic GHG emissions. The Honolulu Commission requested that I present the paper to the State Climate Commission. Dr. Makena Coffman, UHERO researcher, presented a critique of the paper a year later indicating that the correct figure would be equal to all Hawaii's domestic emissions. However her analysis did not count any connecting flight emissions, but only the two Hawaii legs of an itinerary. This is resultant from her use of the Hawaii State Greenhouse Gas Inventory, of which she was an author, for visitor data. My findings were based on the Hawaii Tourism Authority's eight 'Global Regions of Origin' visitor data and thus counted 'connecting flights' in the itinerary (which has its own problems).
4. Also subsequent to Dr. Coffman's presentation, the IPCC designated as 'best science' on Aviation emissions a method which calculates the global warming potential of 'non-CO2 emissions' as twice that of CO2 emissions themselves. Whereas myself and Dr. Coffman had calculated these 'non-CO2 emissions' as equal to the warming potential of CO2 itself, using the IPCC endorsed method would bring her calculation of visitor air transport GHG

emissions to 1-1/2x the state's total domestic emissions, and my calculation, including the multiple legs of any visitor itinerary, to 2x the state's total net domestic emissions.

CLIMATE CHANGE

26. P. 11 "Although Hawaii Island alone will not reverse global GHG emissions, we can lead by example and set a precedent for other island states to become more sustainable.

Comment: By far, the most important example that we can set would be to set a yearly adjustable tax or fee on visitation to our islands. This fee should begin modestly but progressively increase to bring the number of visitors down dramatically over a several year period. The only practical source of such a fee is a Visitor Accommodations Tax. The current State administration has suggested a \$50/visitor fee (voluntary). This is insufficient to reduce visitation here. Whereas the appropriate placement of revenues from a Visitor's fee should be toward resilience to the challenges of Climate Change and sea level rise, in that visitor air transport emissions are greater than Hawaii's domestic emissions, the current proposal before legislature places the modest voluntary revenues received toward renovations of parks and trails and beaches.

27. P. 12. Airline transportation also contributes significantly to greenhouse gas emissions, as the only transportation to and from the island is by air.

Comment: The State Greenhouse Gas Inventory places the greenhouse gas emissions from domestic aviation at 3.2 million tons CO₂(e). 86% of passengers are visitors. This is with total domestic emissions about 13 million tons. All ground transportation accounts for 3.8MMT and stationary combustion (electricity generation) at 8MMT. However this 3.2MMT is departures only (one way) and does not include connecting flights on the itinerary but only the leg leaving Hawaii. It does not count any international flights. It accounts for minimal NO_x emissions but otherwise only CO₂ emissions. An averaging of results of eight aviation greenhouse gas calculators found online places the 'non-CO₂' emissions warming potential at equal to the CO₂ emissions and thus the total global warming GHG emissions from aviation at 2x the easily calculable CO₂ emissions. Using this method Makena Coffman PhD., UHERO faculty & an author of the Hawaii State GHG Inventory, concluded that emissions from visitor aviation equaled the total of Hawaii's domestic emissions in 2019. Her method also did not include any connecting legs of an itinerary other than the Hawaii legs. Using her method but adding connecting flights brings the total global warming in CO₂ equivalents to approximately 1-1/2x the State's total greenhouse gas emission. Using the IPCC endorsed factors for Non-CO₂ emissions in calculating warming from aviation brings the total CO₂(e) from air transport of visitors to 2x Hawaii's total domestic GHG emissions.

28. P.13. "The County will need to preserve open spaces and forested lands to maintain carbon sinks.

Comment: The county needs to dramatically increase its open spaces and forested lands but preservation is a foundational part of that. Funds for tree planting and restoration of forested lands should become available via a fee on visitors here due to visitors heavy GHG footprint from air travel.

29. P.15. Pursue innovative solutions that help achieve various goals such as waste to energy and micronuclear.

Comment: The traditional approach to 'Waste to Energy', the burning of waste, creates more greenhouse gas per KWh of electricity produced than does burning coal. The elimination of landfills diminishes Methane release to varying degrees depending on landfill technique, which may compensate for the combustion emissions.

30. P. 15. Fire risk reduction around communities potentially limits fire spreading into upland areas, reducing fire driven forest loss.

Comment: The firebreak/fuel break perimeter management around communities works both ways for the good of community and environment. Water supply to these perimeter lands must be ensured to support grazing or agriculture or community gardens and, in case of fire, the assurance of firefighting potential.

31. P. 17. Support the achievement of 70 percent renewable energy for the electricity sector by 2030, with 40 percent from renewables and 30 percent from efficiency, and 100 percent by 2045.

Comment: The language here is misleading. If one is advocating for 70% of electricity generation from renewable energy, that is contrary to 40% of generation is from renewables and there has been a 30% gain in efficiency. Please explain the meaning of this directive. Is this merely a rationalization for failure to meet a 70% renewables goal by 2030.

32. P. 20. Adopt a land acquisition program with potential leaseback options for the purchase of hazard-prone locations or those with beneficial attributes for climate adaptation or mitigation.

Comment: This is not something that the public will bear. This feels like collusion between corporate or wealthy land owners and Administration. This is a directive which must be taken to the public in the form of a referendum before it is placed in the General Plan. This certainly would be reason for the County Council to defer ratification of the Draft General Plan. Proposals with this level of controversy should not be placed in the General Plan until they are taken to the people by referendum or, at least, the County Council.

SUSTAINABLE GROWTH AND RESILIENT COMMUNITIES

33. P24. Over the next 25 years, the population growth rate is expected to decline from an average of 2.3% per annum to about 0.9% per annum. In 2045 the resident population is forecast to be approximately 273,000 which is a 35% increase over 2018.

Comment: Please explain the reason for this decline in population growth rate..

34. P. 24. About 90% of growth on average is through immigration.

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 for heritage residents should be discouraged, and domestic agriculture should be emphasized for the purpose of resiliency.

35. P. 24. In 2018, 67,000 Hawaii State residents moved to the mainland; they were partially replaced by 54,000 mainlanders who moved to the State for a net out migration from Hawaii of 13,000.

Comment: 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.

36. P. 24. The population over age 65 is expected to grow to 44% by the year 2045. In 2020, the largest cohort of the population was between the ages of 60 to 69.

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.

37. P24 The number of transient accommodation rental units is beginning to trend higher than hotel units that once dominated the visitor accommodation industry. There is also a shift in the type of visitors away from the major resort areas, which may put stress on the environment of other areas.

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.

38. P. 26. Remove barriers to residential development in the appropriate districts to reduce development timelines, increase housing stock availability and increase affordability.

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.

39. P. 26. Review and update the Building and Zoning Codes to allow for more flexibility

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.

40. P. 26 Collaborate across State and County agencies to facilitate efficient and effective land use processes

Comment: Collaboration is always desirable. Please describe what is currently the impediment to collaboration.

41. P. 26. Advocate allowing for County initiated State Land Use Commission District Boundary Amendments to meet the preferred land use pattern.

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.

42. P 26 Program the initiation of rezoning in targeted growth areas.

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 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.

43. P 28. Develop a process for County initiated State Land Use boundary reclassification.

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.

44. P 28 Amend the Zoning Code and Subdivision Code to allow Cluster Plan Developments to be applied to all zoning districts with appropriate building site standards.

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.

45. P29 Amend the Zoning Code to allow for Planned Unit Development to become administrative permits and subject to the approval of the Planning Director

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.

46. P 59. Support the development of small scale visitor accommodations with heritage, agriculture, wellness or similar themes in rural areas and near points of interest.

Comment: All public support for short term visitor rental accommodation should be removed other than in designated resort areas.

47. P. 59. Provide flexibility in discretionary permit applications to maintain health and safety for rural small scale visitor accommodations not serviced by public infrastructure.

Comment: All public support for short term visitor rental accommodations outside of resort areas should be removed.

48. P. 59. Amend the Zoning Code definition and requirements for Lodges and reconcile similarities and inconsistencies with the special permit provision for Retreats. Clearly articulate in the Code the zoning districts appropriate for Lodges.

Comment: Please specify the referred to definitions and differences between Lodges and Retreats

49. P. 59. Amend the zoning district's currently listed as Family Agricultural District and Residential and Agricultural District to be consistent with the Rural designation and to allow for home occupations that do not negatively impact the rural character.

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.

50. P59. Amend the Zoning Code and Subdivision Code to establish Clustered Rural Subdivision PUD

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.

ROADWAYS

51. P. 79. Allow for private, non-dedicated cul-de-sac and alley designs that are in accordance with national road standards.

Comment: The County should enact ordinances or policies that discourage the building of gated community roadways, even if the gated roadways are privately constructed. Such gated roadways only increase the sense of division in society at a time when blending those divisions has taken on much importance.

52. Removal from the Highways section of the 2005 General Plan the following:

13.2.5.4.2 Courses of Action

(C) Encourage the State to construct a scenic highway from the Waipio Valley look-out extending Mauka to connect to Mud Lane at the entrance of Waimea.

53. Removal from the Recreation section of the 2005 General Plan the following:

12.5.4.2 Courses of Action

(D) Encourage the State to develop a scenic park on the Kohala side of Hiilawe Falls in conjunction with the development of the scenic highway.

Comment: Please explain the rationale for removing the above two directives of the 2005 General Plan from inclusion in the Draft General Plan 2045.

54. P. 103 SHALL indeed!

55. P. 118. Unable to find reference

Comment: "Because in many of our rural communities with less residents public facilities are often neglected and deferred or no maintenance is typical. Examples are the gyms in Ookala, Hakalau and Papaaloa. The gyms in Ookala and Hakalau are now condemned and closed. Recreational and elderly programs there no longer exist. In the case of Papaaloa, the community rallied and got the county to restore at least the community hall. With adequate maintenance these legacy facilities could have been retained and allowed to serve their communities."

56. P. 113 Unable to find reference

Comment: There is a fine balance that good design finds between these measures and multimodal elements.

57. P. 19 Unable to find reference

Comment: A great place to start would be with County employees.

58. P. 27. Unable to find reference

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.

59. P. 28 Unable to find reference

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."

60. P. 49. Unable to find reference.

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."

61. P. 80 Unable to find reference

Comment: Roadway network connectivity especially when provided with appropriately applied Complete Streets standards is a must and should be part of the subdivision code. Connectivity of roadways is a main component of Traditional Neighborhood design. We don't wish to repeat the lessons learned from the cul-de-sac subdivisions of the past with the high daily vehicle trip count and VMTs

62. P. 138 Unable to find reference

Comment: "Besides parks, we can start with our urban centers' streets. Most of our parks are mostly devoid of trees because of Park department culture and their focus on lowest maintenance. Of course having trees in our streets would require appropriate funding and responsibility for maintenance of this ""green infrastructure"" and as importantly, a cultural shift at Dept of Public Works who have jurisdiction of our County roads."

63. P.184 Unable to find reference

Comment: "Thus the need for leadership that recognizes and demands an integrated approach amongst the cast of players, agencies, etc."

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."

65. P. 29 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.

Comment: 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.

66. P. 29 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."

67. P. 31. 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."

68. P. 34. 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. "

69. P. 50 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.

70. P. 50 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. "

71. P. 51 Provide for the establishment of new Retreat Resort areas in appropriate locations.

Comment: Too vague. Define appropriate.,

P. 52 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.

72. P. 78 In November 2020, the County of Hawai'i adopted by resolution a Street Design Manual to set standards for how County streets should support all modes of traffic. For each street type found in the County, this manual illustrates how the right-of-way should allocate space for multimodal activities following active transportation priorities. These standards are essential for new development and infrastructure rejuvenation projects to design and achieve active transportation solutions in each step of modernizing the County's transportation system properly and adequately.

Comment: "Besides active transportation and multimodal aspects of Complete Streets, consider adding mention of environmental benefits of green strategies roadway design as this is also a key component of Complete Streets. Roads make up a large component of the public infrastructure and their environmental impacts are immense. Best practices like incorporating vegetated swales and basins for infiltration and water quality treatment; and street trees for shade, visual quality and community character, carbon sequestration and air quality are part of sustainable development/resilient community design principles."

73. P. 79 Continue to adopt the County of Hawai'i Street design manual as the county's complete street design program/policy.

Comment: Why hasn't the Street Design Manual been adopted as the County's road standards and incorporated into the Hawaii County Code?

74. P. 80 Encourage flexibility in applying the County of Hawai'i Street Design Manual when necessary to preserve the rural character of an area while maintaining a pedestrianfriendly design and desired landscaping solutions.

Comment: Amend the Street Design Manual to include rural road standards that are appropriate to our typology of rural village roads. Also amend the manual to include alley design if not already adopted as part of the manual for rural and urban neighborhoods.

75. P. 81 Develop green infrastructure standards including right-of-way (ROW) landscaping, low impact development (LID), and drainage.

Comment: Provide funding and County capacity and responsibility to maintain green infrastructure in the County Right-of-Ways.

76. P. 92 Prioritize sewer for sensitive urban areas.

Comment: "Not just sensitive urban areas. We have sensitive areas in rural and residential areas that are no longer appropriate to rely on cesspools and even IWSs. Also need to ensure directing upgrades and new wastewater infrastructure to those desired areas as identified in the GP and CDPS."

77. P. 92 Encourage groundwater recharge through on-site practices.

Comment: "Not just through on-site practices. Encourage groundwater recharge PERIOD. If you want to define how, then include all scales from sound regional scale master planning down through site specific best management practices such as Low Impact Development strategies."

78. P. 93 Public Utilities section on Stormwater:

- Prioritize resiliency measures that support climate change impact scenarios.
- Regularly amend County codes to be as current and innovative as possible.
-
- Comment: "suggest adding a priority action item that identifies specific County Codes need to be updated. Much of our current codes as it relates to stormwater are woefully outdated. For example our roadway and landscape standards and building code site planning standards need to be revised to reflect current best practices such as Low Impact Development (LID), green/sustainable standards, Smart Growth principles, etc as appropriate to our island environment."

79. P. 94 Encourage the clustering of developments to reduce the cost of providing utilities.

Comment: and higher density,

80. P. 95 The Hawai'i Electric Light Company, Inc. (HELCO) supplies electricity for Hawai'i Island and operates major switching stations (used to transfer the flow of power between different transmission circuits) at critical locations around the island. These transmission switching stations provide greater system flexibility and increase system reliability in supplying power to the various distribution substations and eventually, to customers. Distribution substations, which transform voltages to distribution voltages, are also located island-wide in proximity to communities and other developments.

Comment: Wouldn't more localized/smart grids reduce the loss of power inherent in distributing electricity over long distances?

81. P. 103. Maintain the water master plan to consider water yield, present and future demand, alternative sources of water, guidelines, and policies for the issuing of water commitments. [project | DWS | ongoing]

Comment: Need to ensure that the Water master plan is in sync with the GP and CDPS and other community plans so DWS actions are coordinated with the County's plans instead of the status quo of meeting their existing customers' needs and/or those who can afford to develop and pay for new water infrastructure.

82. P. 106 As communities generate wastewater through various sources such as residential, commercial, and industrial activities, effective treatment is necessary to remove harmful pollutants and contaminants before the water is discharged back into the environment. Improperly treated wastewater can have detrimental effects on marine ecosystems, coastal waters, and freshwater resources, jeopardizing both human and ecological health.

Comment: "Recognize that the fact that combining waste with water and then having to separate, treat and convey the wastewater is a very inefficient and expensive process. At least consider at appropriate scale other alternative systems that avoid combining waste with potable water.

As with recycling, instead look to view waste as resource with beneficial use.

83. P. 108 Plans for wastewater reclamation and reuse for irrigation and biosolids composting (remaining solids from the treatment of wastewater are processed into a reusable organic material) shall be utilized where topographically feasible and needed for landscaping purposes.

Comment: "While it is less expensive to use gravity flow to distribute reclaimed wastewater, we perhaps should not limit reuse to "topographically" appropriate areas. We have the technology to use sustainable energy sources such as wind, solar to pump reclaimed wastewater for reuse. All the more critical to ensure proper location of development and the associated waste/wastewater treatment facilities as part of an integrated plan, not just for urban areas but rural villages and our agricultural lands."

84. P. 109 Encourage on-site water reuse solutions for large developments.

Comment: "Require,

85. P. 112 Green infrastructure is crucial for stormwater management, as it captures and absorbs runoff, reducing the volume and rate of runoff.

Comment: And provides water quality treatment i.e. filtration of sediment and bioremediation of toxic pollutants.

86. P. 113 Encourage grassed shoulder and swale roadway design where climate and grade are conducive.

Comment: Suggestion, Vegetated shoulder rather than grassed. Grass/lawn is not the only option. Important to note that these policies need to be accompanied by capacity to properly maintain to ensure ecosystem service benefit.

87. P. 113 The "Drainage Master Plan for the County of Hawai'i" should be updated every 20 years for urban centers to incorporate new studies and reflect newly identified priorities.

Comment: "Not just urban centers. Need to look at regional scale context and identify areas that provide flooding buffers, natural water quality treatment i.e. wetlands, riparian edges, muliwai, etc. for these areas provide valuable ecosystem services way more effective than engineered solutions. Consider utilizing these areas as open space, recreation zones with trails that serve not only environmental function but cultural/community benefit."

88. P. 114 Maintain the Department of Public Works Storm Drainage Standards to reflect current data and to incorporate strategies and standards of green infrastructure and low-impact development.

Comment: ""Add ""and upgrade""

89. P. 114 Develop a monitoring and evaluation program for impervious surface coverage.

Comment: "Add ""and configuration.""

Low Impact development principles also call for the shapes and location of impervious and pervious areas to be discontinuous so that storm runoff from impervious areas can be received by appropriate sized adjacent pervious area. This minimizes generation of storm runoff and erosion and provides for better infiltration and groundwater recharge."

90. P. 115 Identify County Parks and Recreation sites for green infrastructure demonstration projects.

Comment: Also utilize road rights of ways for demonstration pilot programs.

91. P. 117 The County provides police and fire protection and solid waste disposal

Comment: Also waste water treatment,

92. P. 118 Under Public Facilities and Services Challenges: Sewage, industrial waste, and other pollutants have penetrated some swimming, surfing, fishing, and boating areas, reducing the availability and/or quality of these areas for recreation.

Comment: ""contaminated"" instead of penetrated?"

93. P. 134 Parks and recreation areas play a key role in climate resilience efforts and overall environmental sustainability. They may provide green spaces that help mitigate the urban heat island effect in our urban growth

areas, improve air quality, and support biodiversity by providing habitats for native plant and animal species.

Comment: "Can also serve as disaster mitigation. For example open space, appropriately contoured and vegetated can serve to reduce the force of tsunamis. Also parks and open space areas can serve as buffer zones to receive and store flood waters.

94. P. 136 Recreational facilities shall reflect the natural, historic, and cultural character of the area.

Comment: "A needed change is the Park's department's approach to facilities design and maintenance. Design and maintenance of parks facilities should improve the quality of life of our residents and be a source of community pride. While facilities need to be sturdy and durable, they should not be designed with vandalism resistance and minimal maintenance as the primary focus. Parks including parking lots and open space should be properly landscaped with trees and other plantings for shade, beauty and function. For too long the County's Park department park design and maintenance culture has been dominated by a lowest common denominator of vandal resistant and lowest maintenance design resulting in fortress-like structures and parks with minimal shade trees, shrubs and groundcover with the exception of lawn. This needs to change. Hawaii County deserves better. ",136

95. P. 137 Implement a proactive maintenance program to ensure that park facilities and trails are safely maintained for optimum usage.

Comment: "Add ""appropriately"" maintained... See general comment under heading above for Recreational Facilities Siting and Planning."

96. P. 139 Analyze under-represented open recreation and healthy living activities to be included in Park Standards.

Comment: "One of these under-represented recreational facilities is trails for walking/hiking/ biking. As part of a strategy for climate change transition and sea level rise, identify coastal areas and routes for these trails.

97. P. 139 Amend the HCC to better address park and recreation issues in the following ways: Note:

Edit to reflect future code updates.

- i. Amend subdivision code (Ch. 23) to be consistent with Dedication of Land code (Ch. 8) in providing land area for park and recreational use or pay a fee in lieu thereof.
- ii. Develop and adopt an Impact Fees Ordinance

Comment: Paying fee in lieu of has never been an workable solution for even partially funding projected recreational needs.

98. P. 154 Under Affordable Housing Character Guidelines:

Comment: "Suggest adding that these affordable housing developments shall ideally be located in proximity to and integrated into existing and proposed urban and rural centers so that there is easy access to necessary services and goods, recreation and other quality of life amenities."

99. P. 164 Under Economic Challenges of the Visitor Industry Add: “better planning/design and management,”

100. P. 180 Implement interpretive programs and stewardship at wahi pana.

Comment: Need more specifics: Develop community based program to codify wahi pana status along with specific stewardship organization and processes.

101. P. 181 Integrate ‘āina based and place-based values into Hawai‘i Island’s identity.

Comment: "Aina based generally covers place-based. Maybe ""aina and community based"" instead of "" aina based and place-based.""

102. P. 184. The county has not developed a scenic resources protection program, including view impact procedures, criteria, and standards.

Comment: "add ""scenic resource inventory""

103. P. 184 The waters surrounding Hawaii Island are affected by increasing waste products such as marine debris, plastic pollution from land and ocean sources as well as effluents, pollutants and toxins generated and released from land-based sources such as cesspools and septic systems.

Comment: "add ""injection wells""

104. P. 186 Encourage the preservation and restoration of natural landscape features, such as coral reefs, beaches and dunes, forests, streams, floodplains, and wetlands, or aquifer recharge areas that have the inherent capacity to avoid, minimize, or mitigate the impacts of climate change.

Comment: "and, not or"

105. P. 188 Develop buffer policies to protect native forests, wildlife, and habitat.

Comment: "add ""rivers, streams, coastal waters including but not limited to anchialine ponds""

106. P. 190 Restore wetlands and riparian corridors to decrease erosion, increase sediment management, groundwater infiltration, nutrient/pollutant uptake, soil moisture retention, stormwater abatement, and cultural/community connections.

Comment: Protect and...,

107. P. 194 Develop and establish view plane criteria, rankings, and regulations to preserve and enhance views of scenic or prominent landscapes from specific locations, and coastal aesthetic values.

Comment: "Add ""and/or corridors""

Collaborative Bicultural Stewardship chapter

The plan urges the County to increase interagency and intergovernmental collaboration. The 'ahupua'a (mauka-makai) perspective by island communities is essential to face the (not so distant) threat of adverse climate disaster. I would encourage the plan to recognize the role of estuaries to our forest/coastal resources health. Hawaiian estuaries, albeit small, is the gatekeeper of our mauka-makai and makai-mauka connectivity. Hawaiian streams are two-lane highways.

My suggested changes are listed;

- 108. p.184; Watershed
 - +**There** watershed...(Three?)
 - Stewardship
 - Intergovernmental?
- 109. p.185 Policies 45.2
 - +remove coral from coral reefs-not all reefs are coral. Hamakua coast, for example
 - Policies 45.3
 - +include riparian buffer zone
- 110. p.187 Priority Action 45.i
 - +include 'streams'
 - Priority Action 45.o
 - +include 'estuary'
 - Priority Action 45.q
 - +include 'estuaries'
- 111. p.189 Policies
 - 46.6.f
 - +remove word (volume). The character (flashiness) of stream flow is as significant as its volume to native biota and stream ecological processes.
 - 46.6.j
 - +add '...develop partnerships to mitigate sediment and nutrient loads.' (ie. oysters planting to decrease nutrient load in Hilo Bay)

Submitted to Planning on Dec. 27 by,
Tawn Keeney, Chair, Hamakua CDP Action Committee