

From: [Matt Chalker](#)
To: [Planning LPC Testimony](#)
Subject: June 18 2026 Testimony
Date: Monday, June 15, 2026 5:39:07 AM
Attachments: [WSA Testimony LPC 2026-06-18 Item6 PL-SLU-2026-000016.pdf](#)
[WSA Testimony LPC 2026-06-18 Item7 PL-REZ-2026-000096.pdf](#)

Aloha,

Please see the two attached pieces of testimony in opposition to agenda items 6 and 7 for the June 18, 2026 meeting of the Leeward Planning Commission.

Mahalo,

Matt Chalker

PL-REZ-2026-000096 (Waikoloa Green LLC, Change of Zone)**POSITION: OPPOSE unless conditioned on cumulative evacuation analysis and a binding, egress-directed road contribution**

Aloha Chair Au and Members of the Leeward Planning Commission,

Wildfire Safety Advocates (WSA) is a Hawai'i 501(c)(3) nonprofit organization formed after the 2021 Mana Road and 2023 Lāhainā Fire to address structural wildfire risks. We submit this testimony in opposition to the requested change of zone, unless any approval is conditioned on a cumulative evacuation capacity analysis and a binding contribution toward the regional egress infrastructure this development will burden.

The defining problem with this application is its silence on wildfire. The submittal analyzes flood, tsunami, lava, and unexploded ordnance, but not the hazard that has already driven this community onto a single road. The applicant's own survey confirms the parcel is wall-to-wall buffelgrass and fountain grass, the fuel that carried Mana Road and Lāhainā. The change of zone before you would establish development potential well beyond the conceptual plan, by the staff report's own reckoning approximately 431 multiple-family units, 320 Family Agricultural lots, and 26 ten-acre lots, before accessory dwelling units, and every access point it proposes empties onto Waikōloa Road and Pua Melia Street. The recommendation further concedes that the parcel lies outside the coverage of the nearest Civil Defense warning siren, which it places roughly a mile north in the village, and conditions approval on the applicant installing one. The County's own analysis thus acknowledges that this site sits beyond the community's existing emergency-warning infrastructure, yet never extends that acknowledgment to the harder question of how its residents would leave. This rezoning adds hundreds of households to a single-egress network in a high-risk fire corridor, and the record does not analyze what that does to evacuation.

We ask the Commission to look closely at how the Planning Department's recommendation treats the South Kohala Community Development Plan, because it reveals a flaw that reaches well beyond this applicant. The favorable recommendation rests substantially on conformance with the 2008 SKCDP. Its opening pages invoke the CDP repeatedly to establish that the project belongs here. WSA agrees, and we want the record to be clear on this point: the South Kohala Community Development Plan is an adopted policy instrument that decision-makers are bound to apply, not an aspirational wish list. The Department has correctly treated it as authoritative.

That makes what follows a problem of internal consistency. When the recommendation moves from conformity into its discussion of infrastructure and safety, the CDP disappears. The very same document treated as controlling on the question of whether the project fits is simply absent from the discussion of whether the community can safely absorb it. This is precisely where the CDP's identification of a permanent second access road for Waikōloa Village as a very high priority should have been invoked and weighed. Its omission from the infrastructure and safety analysis, in a recommendation that elsewhere relies on the CDP as a controlling authority, is a

material flaw. A planning document cannot be authoritative when it supports approval and irrelevant when it counsels caution.

The recommendation's treatment of evacuation makes this concrete. After summarizing the residents who raised wildfire and evacuation concerns, the recommendation states: "Multiple residents requested construction of a second access road before approval of additional residential development. Staff notes that the proposed zoning action would not trigger a requirement for the applicant to construct a secondary access roadway out of Waikōloa Village. However, to address community concerns, a condition of approval will require the applicant to prepare an Emergency Evacuation Plan for review and approval by the County of Hawai'i Civil Defense Agency."

Three things about this passage deserve the Commission's attention.

- 1) By anticipating and naming the objection, the recommendation demonstrates that staff were fully aware the record is contested on exactly this issue.
- 2) The operative sentence, that the zoning action "would not trigger a requirement" for a second access, is offered as a rationale for setting the question aside, but it is an unsupported assertion. Nowhere does the recommendation identify what action, what unit count, or what threshold would trigger such a requirement. A claim that a requirement is not triggered, with no stated standard for what would trigger it, cannot be corroborated and is not a finding. It is a way of excluding the issue rather than analyzing it.
- 3) The Emergency Evacuation Plan offered as mitigation, required only after approval under Condition T and submitted to Civil Defense before occupancy, addresses how to move residents off this single parcel. It does not, and by its terms cannot, analyze whether the regional corridor can carry them. It treats the project in isolation, when any meaningful evacuation analysis must account for the entire Waikōloa community area.

This points to the larger methodological defect. The only cumulative analysis anywhere in this record is the Traffic Impact Analysis Report, and it is a peak-hour commute study that adds background developments to measure ordinary intersection delay. There is no cumulative evacuation capacity analysis at all. General Plan 2045's direction that infrastructure adequacy be assessed where services "exist or can reasonably be provided," and its requirement that development contribute its pro-rata share of regional infrastructure, both presuppose a regional and cumulative view. The application analyzes the wrong problem. It studies whether the morning commute backs up, not whether the community can flee a wind-driven fire, and it studies one parcel rather than the evacuation shed it sits within.

These failures also leave the project's fair-share obligation inadequate to its actual risk, in three correctable ways.

- 1) The Condition W contribution is calibrated to commute-hour Level of Service, not to evacuation, so it neither measures nor mitigates the life-safety burden this development adds.
- 2) The concurrency conclusion rests on roads the County cannot rely on and has no power to require. The Daniel K. Inouye Highway Extension, by HDOT's own Spring 2026 information sheet, was put on hold in 2018 for lack of funding, has never reached a Record of Decision, is only now reentering an environmental review that runs through 2028, and is not scheduled for

construction before 2031 to 2035 under a timeline the Department marks "subject to change," with mapped alternatives that terminate makai of the village and that the TIAR concedes only "may" connect to Waikōloa Road. The full Waikōloa Village Second Access is contingent on a separate developer fully building out an unrelated 1,750-home project; what is funded today is an emergency cut, not the permanent road, with, in the TIAR's words, "no set plans" for completion and an alignment "not known at this time." Neither road is a condition this applicant can be made to perform, and the applicant's own parcel shows why that matters: this is the former Waikōloa Highlands, entitled for roughly 400 units, on which "construction... was never initiated," which is why the Land Use Commission reverted it to Agricultural in 2019. The study compounds the problem by assuming complete a baseline of developments it elsewhere calls stalled or unscheduled, among them Kamakoa Nui, whose "timeline... [is] currently unknown given funding limitations," Lulana Gardens, "stopped around 2012," and Castle & Cooke, whose "timeline... is largely unknown." A concurrency finding assembled from projects the study itself describes as uncertain cannot establish that the corridor will carry this development.

3) Condition J would conditionally waive the Condition W fair-share for the affordable multiple-family units that make up the bulk of the project, which would erase the road contribution on the largest block of households. Affordability is a goal WSA supports without reservation, but evacuation egress is a life-safety obligation that protects affordable and market-rate residents identically and should not be swept into the affordability waiver. We note that the Hawai'i Police Department's own comments in the record found the TIAR wanting, stating that it "did not adequately address operational improvements for the proposed project access points" and characterizing the proposed mauka access as "impractical."

Finally, WSA asks the Commission to recognize that the defects above are not unique to this applicant. They are defects in the analytical template that the County applies to development in wildfire-risk and growth communities. An infrastructure analysis that drops the controlling CDP when safety is at issue, a cumulative study that measures commute delay rather than evacuation, and a mitigation that examines one parcel rather than the community, will recur in every Waikōloa application now in the pipeline, including the Village's own forthcoming studies, and in every comparable at-risk community on this island, unless the Commission uses its authority to correct the standard of review. This recommendation is a useful illustration of the gap, it is not the only place it exists.

WSA respectfully requests that the Commission decline to forward a favorable recommendation unless any approval is conditioned on the following:

- 1) A cumulative regional evacuation capacity analysis, covering the entire Waikōloa community evacuation shed, placed in the record before the rezoning takes effect;
- 2) A binding contribution toward the permanent second access and related regional egress infrastructure, proportional to the households this rezoning authorizes;
- 3) An express provision that this egress contribution is not subject to the Condition J affordability waiver;
- 4) Removal of the unbuilt Daniel K. Inouye Highway Extension and the Nana Kai-contingent full Second Access as assumed Base Year facts in the supporting analysis.

We further ask that the Commission direct, as a standard of review going forward, that where a Community Development Plan identifies infrastructure as a priority that provision be addressed in the infrastructure and safety analysis, that cumulative regional evacuation capacity be analyzed for projects in wildfire-risk communities, and that required evacuation plans be community-wide rather than parcel-level.

Mahalo for your consideration.

Matt Chalker
Executive Director
Wildfire Safety Advocates

