



June 5, 2015

Mr. Duane Kanuha, Director
Planning Department
County of Hawaii
101 Pauahi Street, Suite 3
Hilo, Hawaii 96720

Dear Mr. Kanuha:

Subject: Response to the County of Hawaii General Plan Comprehensive Review

We thank you for the opportunity to provide our initial comments to the County of Hawaii (County) General Plan. It is our understanding that the Planning Director will be reviewing the initial comments and suggestions received to prepare recommended amendments to the County General Plan. We felt that it would be helpful to provide proposed language revisions and encourage you to review them for consideration. These proposed revisions are shown below as changes to the County General Plan as amended through Ordinance 14-09, with deletions shown as strikethroughs and additions shown in red and underlined.

Page	Section	Proposed Changes
9-26	9.5.7.2 Housing, Districts, North Kona, Courses of Action	<u>(d) Vacant lands in areas identified as Urban and Urban Expansion should be made available for residential use before additional agricultural lands are converted into residential use.</u> <u>(e) Encourage a variety of available housing options that allows for choices and flexibility for all households and income groups.</u> <i>Discussion: The proposed action amendments are consistent with the County General Plan overall, and should be priorities for North Kona as there is a need for additional housing supply that allows for financial flexibility for all households and income groups. Greater emphasis should be placed on encouraging development in areas already identified as Urban and Urban Expansion near existing utilities and services. As highlighted in</i>

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		<i>the Kona Community Development Plan (CDP), “there is a growing demand for development that is mixed-use, well-designed, walkable, and higher density. These developments are an important opportunity for redevelopment, infill, and new developments in strategic areas.”</i>
10-5	10.2.3 Public Facilities, Education, Standards	(b) State Department of Education’s education specifications and standards for facilities, <u>as well as addressing 21st century school concepts in its approach.</u> Discussion: <i>The proposed amendment is consistent with the County General Plan’s overall policy of Public Utilities – Education, Section 10.2.2 (b) Encourage combining schoolyards with county parks and allow school facilities for afterschool use by the community for recreational, cultural, and other compatible uses.” and Section 10.2.2 (c) Encourage joint community-school library facilities, where a separate community library may not be feasible, in proximity to other community facilities, affording both pedestrian and vehicular access. In addition, Act 155 (SLH 2013) was enacted on June 21, 2013 and its purpose is to optimize the use of public school lands, generating opportunities to improve public school facilities and infrastructure that meet the challenges of 21st century standards.</i>
11-22	11.6.4.7.2 Courses of Action	<u>(c) Allow connection to Kealakehe Wastewater Treatment Plant if feasible, in particular for developments in close proximity to the facility.</u> Discussion: <i>This proposed action amendment is consistent with the County General Plan’s overall policy of Public Utilities – Sewer, Section 11.6.2 (b) “Private systems shall be installed by large developers for major resort and other developments along shorelines and sensitive higher inland areas, except where connection to nearby treatment facilities is feasible and compatible with the County’s long-range plans, and in conformance with State and County requirements.”</i>
13-14	13.2.5.7.2 Transportation, Roadways,	(p) Construct the proposed Shore Drive from the Old Kona Airport Park to the Kealakehe Drive intersection. <u>Connect</u>

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	Districts, North Kona, Courses of Action	<u>Kuakini Highway from Kaiwi Street to Kealakehe Parkway.</u> <u>(z) Connect Makala Boulevard from Queen Kaahumanu Highway to the Mid-Level Road.</u> Discussion: <i>These roadways, among others, were identified in Table 4-1 and Figure 4-3 of the Kona CDP as priority roadway improvements.</i>
14-7	14.1.1 Land Use, Overview, Introduction and Analysis	Industrial Area: These areas include uses such as manufacturing and processing, wholesaling, large storage and transportation facilities, light industrial and a mix of industrial-commercial-<u>residential</u> uses. Discussion: <i>The proposed amendment encourages the potential for residential to be an allowable use in Mixed Use Zones. Mixed-use developments are an important opportunity for redevelopment, infill, and new developments in strategic areas. Residential housing is a key component of this mixed-use development approach as it allows people the opportunity to live, work, play, eat, and shop in their community. Additionally, mixed-use developments in centrally situated areas do not contribute to urban sprawl.</i>
14-13	14.1.1 Land Use, Overview, Introduction and Analysis	Mixed Use Zones The revision to the Zoning Code, completed in 1996, incorporated the concept of mixed use zones to allow compatible commercial uses to mix with light industrial uses, and mixing of residential and commercial uses. Mixed use light industrial and commercial zones may include, but are not limited to, wholesale, retail, office, <u>residential</u> uses and personal and business services. Mixed use zones are appropriate in areas of economic transition, such as light industrial areas that are in demand as sites for commercial <u>and residential</u> uses, and older residential areas needed as sites for more intensive development. Discussion: <i>The proposed amendment encourages the potential for residential to be an allowable use in Mixed Use Zones. Mixed-use developments are an important opportunity for</i>

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		<i>redevelopment, infill, and new developments in strategic areas. Residential housing is a key component of this mixed-use development approach as it allows people the opportunity to live, work, play, eat, and shop in their community. Additionally, mixed-use developments in centrally situated areas do not contribute to urban sprawl.</i>
14-34	14.4.2 Land Use, Industrial, Goals	The MCX district allows for a mix of some industrial uses with commercial <u>and residential</u> uses. The following areas are identified for industrial – commercial <u>(and/or residential)</u> mixed uses: Keaau (Gateway Center); Hawaiian Paradise Park; Hilo Iron Works; Waiakea Houselots; Kona Industrial Subdivision and the adjacent area to the north <u>(Makalapua Business Center)</u>; and Honokohau (south of the existing Kaloko Industrial Subdivision). Discussion: <i>The Kona Industrial Subdivision and Makalapua Business Center are identified within Transit Oriented Development (TOD) areas in the Kona CDP. The Kona CDP identifies that “there is a growing demand for development that is mixed-use, well-designed, walkable, and higher density. These developments are an important opportunity for redevelopment, infill, and new developments in strategic areas.” Residential housing, especially within a TOD, is a key component of this mixed-use development approach as it allows people the opportunity to live, work, play, eat, and shop in their community.</i>
14-61	14.7.5.7.2 Land Use, Resort, Districts, North Kona, Courses of Action	<u>(d) Encourage additional minor resort and small-scale retreat resort areas in appropriate Urban Expansion Areas.</u> Discussion: <i>As indicated in the County General Plan, not all of the areas zoned for resort are actually utilized for hotels. The County General Plan then identifies as a course of action, Section 14.7.5.7.2 (b) to “Re-evaluate some areas currently zoned for resort use.” As the County re-evaluates resort use in North Kona, we encourage the County to consider including provisions for additional minor resort and small-scale retreat resort areas in appropriate Urban Expansion Areas. With the niche tourism market(s) continuing to expand and establishing itself throughout Hawaii island, we believe that the minor resort</i>

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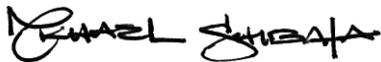
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		<i>and retreat resort areas provides an attractive alternative and complement to the major resort and intermediate resort areas in North Kona.</i>

In addition, here is our proposed revision to the County General Plan's Land Use Pattern Allocation Guide (LUPAG) Map.

Figure	Map	Proposed Changes
12	11	<i>We request that the Industrial area that represents the approximate boundaries of the Kona Industrial Subdivision (KIS) be adjusted. Specifically, the northwestern boundary line should be located between the KIS (zoned MG-1a) and Makalapua Business Center (zoned MCX-20; also referred to as Kona Commons). The Makalapua Business Center parcels should be identified as Urban Expansion, this revision would help in addressing compliance with the Zoning Code and the LUPAG Map.</i>

We appreciate the opportunity to review and provide input to the County General Plan and thank you for your consideration of our above suggestions. If you have any questions or comments, please feel free to contact Ms. LeeAnn Crabbe or myself at (808) 203-6150.

Sincerely,



Michael Shibata
Development Manager