



**STATE OF HAWAII
OFFICE OF HAWAIIAN AFFAIRS**
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June 5, 2015

Duane Kanuha, Planning Director
Planning Department, County of Hawai'i
101 Pauahi Street, Suite 3
Hilo, Hawai'i 96720

Re: Comprehensive Review of County of Hawai'i General Plan

Aloha e Mr. Kanuha,

Thank you for the opportunity to comment on the comprehensive review of the Hawai'i County General Plan (General Plan).

As the constitutionally-established body responsible for protecting and promoting the rights of Native Hawaiians, OHA has substantive obligations to protect the cultural and natural resources of Hawai'i for its beneficiaries. Accordingly, OHA is required to serve as the principal public agency in the State of Hawai'i responsible for the performance, development, and coordination of programs and activities relating to Native Hawaiians; assess the policies and practices of other agencies impacting Native Hawaiians; and conduct advocacy efforts for Native Hawaiians.¹

OHA appreciates that the General Plan prioritizes the protection and preservation of environmental and cultural resources, important agricultural lands, agricultural uses of agricultural lands, and the character of rural areas. OHA also appreciates the General Plan's encouragement of a sustainable fishing industry, as well as its recognition of the importance of maintaining access to the shoreline, public trails, hunting areas, and other culturally significant areas mauka to makai. OHA notes that the General Plan recognizes the careful balance that must be struck in providing greater public access to public lands and resources, and the need to protect and manage such resources for current and future generations; unfortunately, increased accessibility has in some cases already led to the localized destruction or depletion of natural and

¹ HRS § 10-3.

cultural resources essential for subsistence and Native Hawaiian traditional and customary practices.

OHA offers the following general comments and specific recommendations for amendments and additions² to the General Plan on issues of particular concern to the Native Hawaiian community, including Native Hawaiian traditional and customary practices, water resource protection, and housing and homelessness. The following comments reflect OHA's responsibility to better the conditions of Native Hawaiians, and are specifically intended to maximize the benefits of the General Plan for our beneficiaries.

Native Hawaiian Traditional and Customary Practices

Native Hawaiians' continued ability to conduct traditional and customary practices in Hawai'i County is of particular significance to the Native Hawaiian community. After statehood, much of Hawai'i's lands formerly utilized by Native Hawaiians for agriculture, subsistence gathering, and Native Hawaiian traditional and customary practices were the subject of large-scale development projects, contributing to the displacement of Native Hawaiians from their ancestral lands and traditional gathering areas. This post-statehood development boom has had devastating impacts to Native Hawaiian cultural practices and attendant values throughout our islands. Fortunately, Hawai'i County has continued to retain a substantial amount of available lands for traditional and customary and subsistence practices, and hosts a number of our islands' few remaining rural communities recognized as repositories of Native Hawaiian values, knowledge, and practices.³ The ability of these communities and other Native Hawaiians on Hawai'i island to continue traditional and customary practices may therefore play a critical role in maintaining our islands' cultural integrity. OHA strongly recommends that any plans for the physical development of Hawai'i County should endeavor to facilitate the continued exercise of traditional and customary practices, including through the protection of the natural and cultural resources upon which they rely, as an essential component of perpetuating Hawai'i's host culture.

OHA suggests the following considerations, amendments, and additions to the General Plan, to further protect, preserve, and enhance Hawai'i County's natural and cultural environment, and facilitate the perpetuation of cultural practices that rely upon these resources.

² Proposed additions to existing language in the General Plan are underlined while deletions are stricken-through.

³ Dr. Davianna McGregor, a leading scholar and expert on Native Hawaiian traditional and customary rights, notes that only a handful of Native Hawaiian communities have managed to continue, unbroken, the traditions and customs of their ancestors. Dr. McGregor has identified the regions of Ka'ū, Puna, and Waipi'o Valley, as well as the small fishing communities of Kohala and Kona, as some of the few intact Native Hawaiian communities that remained after the post-statehood development boom. These communities are rural strongholds where Native Hawaiian beliefs, values, traditions, and customs continue to be honored and practiced. McGregor explains that protecting these cultural kīpuka is essential to the perpetuation of Native Hawaiian culture throughout Hawai'i, because they are oases from which "Native Hawaiian culture can be regenerated and revitalized in the setting of contemporary Hawai'i." DAVIANNA POMAIIKA'I MCGREGOR, NĀ KUA'ĀINA: LIVING HAWAIIAN CULTURE, UNIVERSITY OF HAWAII PRESS 8, 12 (2007).

1. Add language more specifically recognizing the legal authorities that protect Native Hawaiian traditional and customary practices.

OHA appreciates the General Plan's general recognition of judicial decisions relating to the protection of Native Hawaiian rights on pages 6-3 and 8-5, and of the implications of the Hawai'i Supreme Court's decision in Public Access Shoreline Hawaii v. Hawai'i County Planning Commission ("PASH"), 79 Hawai'i 425, 903 P.2d 1246 (1995) on pages 6-2 and 8-3. Given that future county planners and policymakers may not necessarily have consistent levels of background knowledge regarding the array of legal authorities protecting Native Hawaiians' cultural practices, OHA respectfully requests that the General Plan be amended to more comprehensively recognize such protections as afforded by Hawai'i's Constitution, various statutes, and other judicial decisions.⁴ In addition to PASH, these authorities also direct state and county agencies to reasonably protect the exercise of Native Hawaiian traditional and customary practices.⁵ By including these references, as well as some discussion of their significance to planning and development processes, the General Plan would provide more explicit guidance to future planners in this regard.

2. Address the intersection of natural resources and cultural practices.

OHA requests that the General Plan more explicitly consider and discuss the intersection between resource protection and culture. Although references to cultural practices are integrated somewhat in chapter 12, the General Plan does not reference the intrinsic value of natural resources to cultural practices, or the familial connection between Native Hawaiians and the natural environment. Future planners and policymakers may not have a full understanding of the inherent and direct connection between Native Hawaiians' cultural practices and the resources they rely upon; accordingly, OHA believes that the General Plan should more expressly and consistently contemplate the connection between Native Hawaiian cultural practices, natural and cultural resources, and the need to appropriately mitigate anticipated environmental impacts to these resources from increased access, development, and population pressure.

3. Use proper Hawaiian spelling and punctuation, including but not limited to macrons and glottal stops that punctuate words, to all Hawaiian terms and place names in the General Plan.
4. Specific amendments and additions to the General Plan.

In order to better ensure the consideration of the cultural value of natural resources and features, to better mitigate any potential cultural impacts of future development, and to promote the cultural integrity of Hawai'i Island, OHA respectfully recommends the following

⁴ See *infra* note 7.

⁵ See, e.g., HAW. CONST. ART. XII SEC. 7, HRS §§ 1-1, 7-1; Ka Pa'akai o Ka 'Āina v. Land Use Comm'n, 94 Hawai'i 31 (2000); Pele Defense Fund v. Paty, 73 Haw. 578 (1992). For additional information, see also DAVID M. FORMAN & SUSAN K. SERRANO, HO'OHANA AKU, A HO'OLA AKU: A LEGAL PRIMER FOR TRADITIONAL AND CUSTOMARY RIGHTS IN HAWAI'I (2012), available at <https://www.law.hawaii.edu/sites/www.law.hawaii.edu/files/content/Programs%2CClinics%2CInstitutes/Ho%27ohana%20Aku%20Final.pdf>.

amendments and additions to specific provisions of the General Plan. Recommended additional language is underlined; existing language to be deleted is stricken.

- A. Amend the “Natural Resources and Shoreline” study element in section 1-4 on page 1-5 to read as follows:

“Natural Resources, Cultural Resources, and Shoreline: Describes the valuable and often irreplaceable natural and cultural assets of the island and encourages programs for their proper management and protection.”

- B. Amend section 2.4.8.2 on page 2-29 to read as follows:

“Resort development in the area should not destroy the natural and cultural resources and historical and cultural significance of the area.”

- C. Add a policy to section 3.3 on page 3-9 to read as follows:

“Evaluate the impact that the development or expansion of energy-related infrastructure will have on natural and cultural resources, cultural practices, and Native Hawaiian burials and archaeological sites.”

- D. Amend the third sentence of the third paragraph in section 4.1 on page 4-1 to read as follows:

“Increasing population and urbanization place a greater demand on the limited natural and cultural resources, making their utilization and protection a vital concern to the people of the County of Hawaii.”

- E. Amend goal (a) in section 4.2 on page 4-4 to read as follows:

“Define the most desirable use of land within the County that achieves an ecological balance providing residents and visitors the quality of life and an environment in which the natural and cultural resources of the island are viable and sustainable.”

- F. Add a policy to section 5.3 on page 5-6 to read as follows:

“Design surface drainage and flood-control systems in a manner that will help preserve natural and cultural resources, as well as cultural practices.”

Amend the title of chapter 6 to better reflect the content of the chapter, to read as follows:

“Historical and Cultural Sites”

G. Amend goal (b) in section 6.2 on page 6-2 to read as follows:

“Appropriate access to significant historic sites, buildings, and objects of public interest should be made available. Additionally, protocols should be developed and implemented to ensure appropriate access for cultural practitioners.”

H. Amend policy (b) in section 6.3 on page 6-2 to read as follows:

“Amend appropriate ordinances to incorporate the stewardship and protection of historic and cultural sites, buildings and objects.”

I. Amend policy (d) in section 6.3 on page 6-3 to read as follows:

“Public access to significant historic sites and objects shall be acquired, where appropriate. Access for cultural practitioners shall be ensured.”

J. Amend policy (c) in section 6.3 on pages 6-3 and 6-4 to read as follows:

“Require both public and private developers of land to provide historical and archaeological surveys and cultural impact assessments, where appropriate, prior to the clearing or development of land when there are indications that the land under consideration has historical or cultural significance.”

K. Amend policy (a) in section 7.3 on page 7-2 to read as follows:

“Increase public pedestrian access opportunities to scenic places and vistas[-] in a manner that protects traditional and cultural practices.”

L. Amend policy (r) in section 8.3 on page 8-5 to read as follows:

“Ensure public access is provided to the shoreline, public trails and hunting areas, in a manner that protects natural and cultural resources and respects cultural practices, including free public parking where appropriate.”

M. Add a policy to section 11.1.3 on page 11-1 to read as follows:

“Evaluate the impact public utility facilities development and maintenance will have on natural and cultural resources, cultural practices, and Native Hawaiian burials.”

N. Add the following policies to section 12.3 on page 12-4 to read as follows:

“Identify areas that are important to cultural practices, including Native Hawaiian practices, and encourage the protection of those areas in furtherance of the preservation and continuation of those cultural practices.”

“Evaluate the impact recreational facility improvement and expansion will have on natural and cultural resources, cultural practices, and Native Hawaiian burials.”

“Provide access in recreational areas for cultural practitioners.”

O. Add a policy to section 13.1.3 on page 13-2 to read as follows:

“Evaluate the impact transportation system development and maintenance will have on natural and cultural resources, cultural practices, and Native Hawaiian burials.”

P. Add a policy to section 14.7.3 on page 14-54 to read as follows:

“Manage the development of secondary resort areas in a manner that respects natural and cultural resources and cultural practices.”

Q. Amend the third sentence of the first paragraph of section 14.8.1 on page 14-62 to read as follows:

“Retained in its state of use, open space would maintain and/or enhance the conservation of needed or desired natural, scenic, cultural, or historical resources that might otherwise be permanently lost.”

R. Add a policy to the Economic, Energy, Environmental Quality, Historic Sites, Natural Beauty, Natural Resources and Shoreline, Housing, Public Facilities, Public Utilities, Recreation, Transportation, and Land Use chapters to read as follows:

“Consult with and solicit input from community members, including community members with generational knowledge, early and often about how to minimize the impact of proposed changes to the use of land on cultural practices, cultural sites, and culturally significant areas, including burials.”

S. Add a policy to the Economic, Natural Beauty, Natural Resources and Shoreline, Housing, Public Facilities, Recreation, Transportation, and Land Use chapters to read as follows:

“Encourage the use of Hawaiian plants (indigenous and Polynesian-introduced plants) by state, county, and private landowners in order to support a Hawaiian sense of place, to ensure that our cultural heritage is reflected in landscaping, and to help reverse the displacement and decline of Hawaiian plants.”

T. Amend the paragraph on ceded lands in section 14.9.1 on page 14-64 to read as follows:

~~“Public trust or ceded~~ Ceded lands in Hawaii comprise approximately 1.8 million acres of property throughout the State, or 43 per cent of the State's total land area. These lands, former Kingdom of Hawaii Government and Crown Lands, were "ceded", or transferred, to the United States by the Republic of Hawaii, under the 1898 annexation of Hawaii as a Territory of the United States and after the 1893 overthrow of the Hawaiian Kingdom. The Admissions Act of 1959 that granted Hawaii statehood, defined the State as trustee

for 1.4 million acres of these ceded lands, established the public land trust, and defined five purposes for its use, including one for the betterment of conditions for native Hawaiians. ~~The 1963 Ceded Lands Act allowed the transfer of title to the State of all but 300,000 acres of ceded lands that were excepted by the Federal government.~~⁶ In 1978, voters approved constitutional amendments to create the Office of Hawaiian Affairs and fund it with a share of the money derived from the use of ~~ceded~~ public land trust lands. In 1980, the Legislature defined the Office of Hawaiian Affairs' share of ~~ceded~~ public land trust revenues at 20 per cent. The exact amount of ~~ceded~~ public land trust lands within the County is currently unknown. Act 125 was adopted by the 2000 Legislature to facilitate the establishment of a comprehensive information system for inventorying and maintaining information about these ~~ceded~~ public land trust lands.

OHA notes that additional information is available about the identification of public trust lands within the County. OHA invites the County to communicate with OHA regarding this information.

Wai (Water)

The importance of water to the Native Hawaiian people is captured in the 'ōlelo no'eau – “Ola i ka Wai (Water is Life).” Traditional Hawaiian management of this precious resource included the assurance of mauka to makai stream flow, which provided sufficient water for food production, drinking water, native stream life, healthy estuaries, and ground water recharge. Groundwater sources, such as springs and anchialine ponds, were also highly respected and cared for, particularly in Hawai'i Island's leeward areas. Today, access to and proper management of water continues to be necessary for a thriving Native Hawaiian people and culture. Accordingly, OHA consistently advocates for appropriate water management practices and compliance with laws that protect both Native Hawaiians and the larger Hawai'i community.

Decisions impacting the use, availability, and quality of water resources may have direct, long-term impacts on Native Hawaiians' priority rights protected by the Hawai'i State Constitution, the Water Code, and applicable case law.⁷ Recent court decisions have affirmed that state and county permitting agencies have affirmative and independent obligations to ensure that our public trust water resources are protected and used for the public benefit. This means that traditional and customary practitioners, domestic users, the Department of Hawaiian Home Lands, appurtenant right holders, and the environment should receive priority consideration in the decisions that may affect the allocation of public trust water resources.

⁶ It appears that the “Ceded Lands Act” is referring to P.L. 88-233. Two provisions of the Admission Act allowed the federal government to retain title to certain ceded and territorial lands, and provided for a five-year period during which the federal government could convey any “land or property [that] is no longer needed” to the state. In 1963, P.L. 88-233 was enacted to extend this five-year period indefinitely and directed the U.S. General Services Administration to determine which lands would be considered “surplus property” and to convey any surplus property to the state.

⁷ See, e.g., HAW. CONST. ART. XI SECS. 1 & 7, ART. XII SEC. 7; HRS §§ 1-1, 7-1, 174C-101; HRS CHAPTER 174C; In re Water Use Permit Applications, 94 Hawai'i 97, 9 P. 3d 409 (2000) (Waiāhole I); Ko'olau Agricultural Co., Ltd. v. Comm'n on Water Res. Mgmt., 83 Hawai'i 484, 927 P.2d 1367 (1996); Reppun v. Bd. Of Water Supply, 65 Hawai'i 531, 656 P.2d 57 (1982).

OHA notes that sufficient stream flow and groundwater discharge, including the environmental services provided by such freshwater sources, may be essential to Native Hawaiians' ability to engage in subsistence, agricultural, and traditional and customary practices.⁸ Such practices may include lo'i cultivation, the collection and harvesting of subsistence and cultural resources, and the performance of spiritual and religious practices.

OHA offers the following recommendations for the General Plan, which may support the proper management and appropriate use of Hawai'i Island's fresh water resources:

1. Add discussion of the constitutionally, statutorily, and judicially-recognized protection of water rights.

Given that future county planners and policymakers may not necessarily have consistent levels of background knowledge regarding water rights, priority of uses, and the importance of allocation of water to the perpetuation of Hawaiian culture, OHA respectfully requests that the General Plan be amended to explicitly recognize the protection afforded by Hawai'i's Constitution, statutes, and most recent judicial decisions.⁹

2. Specific amendments and additions to the General Plan.

In order to better ensure that future development takes into consideration the cultural value of water, the county and state's legal obligations and responsibilities relating to this public trust resource, and to better mitigate any potential impacts to the quantity and quality of Hawai'i Island's public trust water resources, OHA respectfully recommends the following amendments and additions to specific provisions of the General Plan. Recommended additional language is underlined; existing language to be deleted is stricken.

⁸ The OHA Board of Trustees passed a resolution on September 14, 2011 "to encourage all stakeholders interested in the sustainability of the Keauhou Aquifer to actively work to protect the traditional and customary practices of Native Hawaiians that are dependent on abundant clean groundwater."

⁹ The General Plan could, for instance, refer to the constitutional and statutory provisions and judicial decisions cited below. *See, e.g.*, HAW. CONST. ART. XI SECS. 1 & 7, ART. XII SEC. 7; HRS §§ 1-1, 7-1, 174C-101; HRS CHAPTER 174C; In re Water Use Permit Applications, 94 Hawai'i 97, 9 P. 3d 409 (2000) (Waiāhole I); Ko'olau Agricultural Co., Ltd. v. Comm'n on Water Res. Mgmt., 83 Hawai'i 484, 927 P.2d 1367 (1996); Reppun v. Bd. Of Water Supply, 65 Hawai'i 531, 656 P.2d 57 (1982). For additional information, *see also* D. KAPUA'ALA SPROAT, OLA I KA WAI: A LEGAL PRIMER FOR WATER USE AND MANAGEMENT IN HAWAI'I (2009), *available at* <https://www.law.hawaii.edu/files/content/news/18470/WaterPrimer.pdf>.

- A. Add a policy to section 4.3 on page 4-5 and to section 11.2.2 on page 11-4 to read as follows:

“Protect, restore, and enhance surface and subsurface water sources, stream habitats, and priority watershed areas to support groundwater aquifer recharge, aquatic and environmental processes, and riparian, scenic, recreational, and Native Hawaiian cultural resources, as well as constitutionally-protected Native Hawaiian traditional and customary practices.”¹⁰

- B. Add the following policies to section 8.3 on page 8-4 to read as follows:

“Support the use of stream and ground water by Native Hawaiian traditional and customary practitioners.”

“Protect and restore mauka to makai stream flow and groundwater discharge to provide sufficient water of appropriate quality to support local food production, drinking water, native stream life, healthy estuaries, ground water recharge, recreation, scenery, and Native Hawaiian traditional and customary rights.”

- C. Add the following policies to section 11.2.2 on page 11-4 to read as follows:

“Where new or improved water system improvements are necessary, avoid impacts to cultural resources; if impacts are unavoidable, implement appropriate mitigation measures.”

“Ensure complete reporting on for all existing wells and permitted withdrawals of groundwater resources.”

“Ensure that best practices for water conservation are enacted and implemented.”

- D. Add a policy to section 12.3 on page 12-4 to read as follows:

“Protect and maintain our oceans, beaches, and other recreational areas to ensure a safe environment for recreational and cultural activities.”

- E. Add a policy to the Economic, Environmental Quality, Natural Beauty, Natural Resources and Shoreline, Housing, Public Facilities, Public Utilities, Transportation, and Land Use chapters to read as follows:

“Consider the most current estimates of sustainable yields related to groundwater in all county decision making.”

¹⁰ OHA notes that these priority uses of water are constitutionally and statutorily established bases for protecting, and in some cases, restoring stream flow to support traditional and customary uses. *See, e.g., Waiāhole I; see also* HRS § 174C-2(c) (“[A]dequate provision shall be made for the protection of traditional and customary Hawaiian rights. . .”).

Housing and Homelessness

OHA notes that the General Plan identifies a number of challenges relating to housing and homelessness, such as insufficient affordable housing, rising housing costs, the lack of adequate housing for agricultural workers and the elderly, and the need for greater services for unsheltered homeless people. Given the significant population growth projected for Hawai'i County during the next decade¹¹ and the anticipated demand for additional housing,¹² strategies to ensure the affordability of new and existing housing and to address the needs of an increasing homeless population will be essential. Accordingly, OHA offers the following comments on issues related to housing and homelessness in relation to the General Plan.

1. Recognize the need for appropriate regulation and enforcement of vacation rentals.

Without a robust mechanism for enforcement, unregulated vacation rentals, also called transient vacation units (TVUs), may significantly raise the cost of housing, thereby pricing local residents out of the market or making units unavailable for local residents to rent. A recent study by the Department of Business, Economic Development & Tourism noted that the increase in vacation rentals has significantly increased the demand for housing,¹³ which contributes to increases in housing prices.¹⁴ Based on information contained in a report on Individually Advertised Units (IAUs) prepared for the Hawai'i Tourism Authority, there were 4,986 IAUs on Hawai'i Island in 2014, with 11,155 (estimated) bedrooms capable of accommodating 28,106 (estimated) visitors.¹⁵

This issue particularly affects Native Hawaiians, as research shows that more than half of Native Hawaiian renters, many of whom already live in overcrowded situations, still struggle to afford their housing costs. Despite the fact that Native Hawaiians participate in the labor force at higher rates than the state average,¹⁶ Native Hawaiians earn significantly less per capita than the state average,¹⁷ and therefore are particularly disadvantaged by land uses that contribute to increased housing costs and rental housing shortages. With these concerns in mind, OHA recommends that a policy be added to chapter 9 on Housing that refers to the need for appropriate regulatory and enforcement mechanisms associated with vacation rentals and TVUs.

¹¹ The Department of Business, Economic Development & Tourism (DBEDT) projects that Hawaii County's population will grow by 29% in the next ten years. DBEDT, Research and Economic Analysis Division, Measuring Housing Demand in Hawaii, 2015-2025, April 2015, page 3, *available at* <http://files.hawaii.gov/dbedt/economic/reports/2015-05-housing-demand.pdf>.

¹² DBEDT forecasted that the demand for housing during the 2015-2025 period will require 19,610 additional housing units. *Id.* at 3.

¹³ *Id.* at 9.

¹⁴ *Id.* at 7, 15.

¹⁵ Individually Advertised Units in Hawai'i, SMS Research & Marketing Services, Inc., prepared for the Hawai'i Tourism Authority, December, 2014, page 3, *available at* <http://www.hawaiitourismauthority.org/default/assets/File/research/accommodations%20studies/Individually%20Advertised%20Units%20in%20Hawaii%20%28Vacation%20Rentals%29.pdf>.

¹⁶ American Community Survey, 2013, Civilian Labor Force Datapoint, U.S. Census Bureau.

¹⁷ In 2013, the per capita income for Native Hawaiians was \$9,105 less than the statewide per capita income. *See* <http://www.oha.org/wp-content/uploads/2014/05/Income-Inequality-and-Native-Hawaiian-Communities-in-the-Wake-of-the-Great-Recession-2005-2013.pdf>, page 5.

2. Highlight the need for continued efforts to address homelessness

The number of homeless people in Hawai'i County and in the state as a whole is growing.¹⁸ In Hawai'i County, according to a point-in-time survey, there were 869 homeless people in 2014, compared to 557 in 2013; this reflected an increase of 56.01%.¹⁹ Accordingly, addressing the needs of Hawai'i Island's homeless people may be an increasingly important issue for the county.

Although demographic data on Native Hawaiians who are homeless are not readily available for Hawai'i County specifically, given the challenges Native Hawaiians face in finding affordable housing, OHA recommends that the General Plan continue to strive to address the needs of Hawai'i County's homeless population, including the need to provide adequate shelter and services.

Miscellaneous Recommendations

Finally, OHA offers the following miscellaneous recommendations for specific amendments to the General Plan, which reflect OHA's strategic priorities and other efforts to improve the conditions of Native Hawaiians.

1. Add a policy to section 9.3 on page 9-10 to read as follows:

"Encourage financial literacy for homeownership and encourage the establishment of best practices to mitigate foreclosure."

2. Add a policy to section 14.1.3 on page 14-13 to read as follows:

"Encourage the acknowledgement of the cultural and historical significance of kuleana lands and the ancestral ownership of kuleana lands."

3. Amend goal (c) in section 14.2.2 on page 14-17 to read as follows:

"Preserve and enhance opportunities for the expansion of Hawaii's Agricultural Industry and for the encouragement of local food production."

¹⁸ Department of Human Services, Homeless Programs Office, Statewide Homeless Point-in-Time Count 2014 Methodology and Results, May 2014, pages 9-11, *available at* <http://humanservices.hawaii.gov/bessd/files/2014/06/2014-Statewide-PIT-Report-Rev-CP-5.91.pdf>.

¹⁹ *Id.* at 11. The number of sheltered homeless in Hawai'i County rose from 160 to 211 from 2013 to 2014, an increase of 31.88%. The number of unsheltered homeless in Hawai'i County rose from 397 to 658 from 2013 to 2014, an increase of 65.74%. In Hawai'i County, the number of unsheltered homeless increased by 56.01%, from 557 to 869 people. *Id.*

Duane Kanuha, Planning Director

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Thank you for the opportunity to provide comments on the comprehensive review of the Hawai'i County General Plan. Should you have any questions, please do not hesitate to have your staff contact Jessica Freedman at (808) 594-1779 or jessicaf@oha.org.

'O wau iho nō me ka 'oia'i'o,

A handwritten signature in black ink, appearing to read 'Kamano Crabbe', with a stylized flourish at the end.

Kamana'opono M. Crabbe, Ph.D.
Ka Pouhana, Chief Executive Officer

KMC:jf