

General Plan Comprehensive Review

Compilation of Initial Input by Topic

October 2015

The Planning Director initiated a comprehensive review of the County of Hawai'i General Plan (2005 edition, as amended) on February 6, 2015. The Action Committees for each adopted Community Development Plan (CDP), the Windward and Leeward Planning Commissions, and the general public had the opportunity to provide their initial comments and recommendations to the Planning Director by June 6, 2015. In addition, the Planning Director established September 8, 2015 as the deadline for Council-initiated amendments by resolution.

Input was received from CDP Action Committees, their subcommittees, and CDP planners as well as from several organizations and members of the public by email and letter. The County Council also adopted Resolutions 237, 249, 250, 251, 253, 256, 257, and 258. Comments ranged greatly from general recommendations about the planning process and General Plan format to very specific policy language or wording recommendations.

Initial input has been organized by major topics to be covered in the General Plan (see the Table of Contents below). The source of each comment is included. Naturally, such a clustering process is subjective, so depending on the reader's interests, a more careful independent review of initial input may be merited.

All comments from the initial input period are captured in some form in this document. Comments that are direct quotes from the source are framed in "quotation marks." Comments that suggest specific language changes to current policy are defined in Ramseyer format (~~strike out deletions~~, underscore additions). Full detail from submittals that had extensive recommendations may not be included; instead, a note referring to the original document is provided.

All of the initial input documents, including a synopsis of input organized by source, are available at <http://www.cohplanningdept.com/general-plan/>.

Initial comments will be taken into consideration during the comprehensive review of the General Plan, as will any additional submittals during the review process. Submittals can be directed to the Planning Department, County of Hawai'i, 101 Pauahi St., Suite 3, Hilo, HI 96720 or via email at generalplan@hawaiicounty.gov.

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1 LAND USE

1.1 General

- GENERAL COMMENT: OHA has extensive recommendations for incorporating appropriate wording and policy pertaining to Hawaiian Culture. Please see the OHA letter for more information.
- GENERAL COMMENT: Extensive recommendations are made in County Resolution Number 257-15. Please review the resolution for specific recommendations pertaining to this section.
- “Public Lands: p. 14-64 paragraph 1. The numbers don't add up. I think State lands should be 44%, not 34.” (NKCDP AC)
- 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. (OHA letter)
- Land Use Policies (presently found in sec. 14. 1. 3): Include the following policy, as written or in substantially similar language: “Incorporate the values and philosophy of the ahupua'a land division resource management system into land use policies and develop and apply regulatory decisions and other government programs, as appropriate.” (Reso 256)

1.1.1 Permitted Uses

- Amend Section 14.1.1: 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 residential uses. (QLT letter)
- Amend Section 14.1.1: 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, residential 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 and residential uses, and older residential areas needed as sites for more intensive development. (QLT letter)
- Amend Section 14.4.2: The MCX district allows for a mix of some industrial uses with commercial and residential uses. The following areas are identified for industrial – commercial (and/or residential) mixed uses: Kea’au (Gateway Center); Hawaiian Paradise Park; Hilo Iron Works; Waiākea Houselots; Kona Industrial Subdivision and the adjacent area to the north [(Makalapua Business Center)]; and Honokōhau (south of the existing Kaloko Industrial Subdivision). (QLT letter)
- “Single-Family Residential: p. 14-46 ‘Ohana stuff is out-of-date.” (NKCDP AC)
- “Resort: p. 14- 53. Intro: Third paragraph from bottom: Perhaps add a description of the variety of short-term rental opportunities under individual vacation units (e.g. VRBO)?” (NKCDP AC)
- “Add development controls for areas subject to subsidence (PCDP2.4.3)” (PCDP AC)

- “Inappropriate and disproportionate County zoning can be adjusted in order to maintain and increase the quality of life and to preserve valued natural and cultural resources (PCDP 3.1.1.e)” (PCDP AC)
- Amend goal (c) in section 14.2.2 on page 14-17 to read as follows: [Preserve and enhance opportunities for the expansion of Hawai‘i’s Agricultural Industry and for the encouragement of local food production.] (OHA letter)

1.1.2 Building Code

- “ADD “Kānaka” Building Code (PCDP 2.1.2.d)” (PCDP AC)
- “Amendments to the County building code for structures utilizing traditional Hawaiian building design and construction methods (PCDP2.1.3.b)” (PCDP AC)

1.1.3 Village and Town Planning

- “Residential neighborhoods - Keep commercial development on the perimeter roads. Encourage a mix of shopping, services, transit, mixed housing styles. Friendly to pedestrians, bikes, pets, kids, seniors, disabled, young adults.” (Individual Comment-letter)
- “Street life—important to create vibrant areas where people want to linger, shop, eat, walk, people-watch. Empty places encourage loitering and unlawful activities.” (Individual Comment-letter)
- “Encourage use of Design Guidelines (PCDP2.1.2b)” (PCDP AC)
- “Plan for County infrastructure improvements that serve Village Town Center locations (PCDP 3.4.3)” (PCDP AC)
- “Develop policies for land pooling or TRDs to encourage clustering development (village/town center models, reduced infrastructure costs) (PCDP 3.1.3a)” (PCDP AC)
- “Support community based action groups in developing Regional Town and Village Center Plans that will guide growth and development in their communities consistent with the PCDP (PCDP 5.2)” (PCDP AC)
- “Services and community facilities are more accessible in village/town centers that are distributed throughout the region, including underserved subdivisions that have been experiencing higher levels of development growth (PCDP 3.1.1.c)” (PCDP AC)
- “Facilitate land use entitlements and financing for the development of new town/village centers (PCDP 3.1.3.d.1)” (PCDP AC)
- “Propose amendments to the zoning code and/or apply district-wide rezoning to limit allowable building footprint on residential and agricultural-zoned lands, except for sites designated as village/town centers or for land pooling projects (PCDP 3.1.3.e)” (PCDP AC)

1.2 Puna

- “p. 5-8: Puna - Restrict development in areas below and close to the SE Rift.” (NKCDP AC)
- “Add BRBZ to GP or additional tools for preservation of the BRBZ area (PCDP2.2.2.a.)” (PCDP AC)
- “Add specificity from CDP – locations of industrial zoning (PCDP 5.2)” (PCDP AC)

- “Enact BRBZ (PCDP2.2.3.a.9) “Amendment to the general plan to recognize the purpose and intent of the BRBZ and designation of State-owned lands in the BRBZ to ‘open’”. (PCDP AC)
- “Develop and adopt special zoning and development regulations for the greater Kapoho area (Kīpū Point to Pū‘āla‘a) to take into account the problems associated with the ongoing and catastrophic subsidence and property loss, pressure to develop lots for residential and commercial use, and increasing demand for access to the shoreline area for recreational use. Request the State to make some of their Kapoho area accreted lands available for integrated solutions, including relocation/land exchange and recreational opportunities. (PCDP 2.4.3.f)” (PCDP AC)
- “Recommend reviewing the rezoning of all Agricultural (A) zoned parcels in the State Agricultural District in Puna to a zoning that would be consistent with the goals and policies of the PCDP (PCDP 3.2.3.b)” (PCDP AC)
- “Tax incentives or TDR (transfer of development rights) strategies for reducing buildable lots (PCDP 3.1.1g)” (PCDP AC)

1.3 South Hilo

- “Remove section 14.3.5.2.2 of the General Plan (2005 Edition, as amended), relating to South Hilo, that recommends focusing commercial development in the Waiākea Houselots area along Kekūanā‘o‘a, Pi‘ilani, Manono, and Lanikāula Streets.” (Reso 251)
- “University area: Needs a comprehensive plan for transportation, housing, services, after-hours activities for young adults, student-friendly ambiance. HCC/UH is an economic opportunity that, if nurtured, will benefit both students and residents. Create the right environment and more students might decide to stay after they graduate.” (Individual Comment-letter)

1.4 North Kohala

- “Support increased distribution and availability of Kohala Ditch water to agricultural producers.” (NKCDP AC)
- “Kohala is a rural area and should be maintained as such. Thus, development should be directed to more urban areas.” [per NKCDP p. 13] (NKCDP AC)
- “What about District-specific needs? Viewing area at Pololū, seawall at Māhukona, etc.” (NKCDP AC)
- “14.2.4.4.2 Courses of Action
 - o a) Encourage the maintenance and more intensive utilization of the Kohala Ditch irrigation system for agricultural production.
 - o b) Support the development of private and State agricultural parks as a means of making agricultural land available for commercial agricultural activities.
 - o c) In reviewing Special Permit applications, rezonings, and other land use changes in the Agricultural District, great care should be given to preserve existing view planes to and along the coastline.
 - o d) Maybe remove line (c) on viewplanes? Why is that under Ag?
 - o e) Limit rezoning of Agricultural lands to development. NKCDP p. 14, 19
 - o f) Concentrate development in mostly urban areas. NKCDP p. 13, 16, 26

- o g) Promote and support a community of diversified agriculture. NKCDP Strategy 1. 4. Which includes:
 - Re-establish Kohala's agricultural education programs, by working with the School Community Council, to generate more farmers (both K-12 and higher education).
 - Secure accessible capital for new farmers, such as a local micro - loan program
 - Create incentives for start-up agriculture, including implementing changes to the County's real property tax code
 - Work with owners of various agricultural water transmission and distribution systems to provide subsidized agricultural water rates” (NKCDP AC)
- “NKCDP Strategy 1.8 also stresses Important Agricultural Lands” (NKCDP AC)
- “Update 14.7.5.5.1 Profile: The district of North Kohala provides overnight accommodations for local travelers. Chalon International, Inc., later changed to Surety Kohala, obtained rezoning of approximately 15 acres of land in 1993 for the development of a 200 to 240-unit lodge hotel at Māhukona. Surety later sold the property to Kohala Preserve Conservation Trust. Although the project was not completed due to financial limitations, the area is still zoned Resort. Watkins/Sunderland have created a 16-room, 50-acre retreat center on the Kapa‘au coast.” (NKCDP AC)

1.5 North Kona

- Add to Section 14.7.5.7.2: [(d) Encourage additional minor resort and small-scale retreat resort areas in appropriate Urban Expansion Areas.] (QLT letter)

1.6 Land Use Pattern Allocation Guide (LUPAG) Maps

1.6.1 General

- GENERAL COMMENT: OHA has extensive recommendations for incorporating appropriate wording and policy pertaining to Hawaiian Culture. Please see the OHA letter for more information.
- GENERAL COMMENT: Extensive recommendations are made in County Resolution Number 257-15. Please review the resolution for specific recommendations pertaining to this section.
- “Look at current areas with multiple “special permits” and adjust LUPAG appropriately (PCDP 5.2.4)” (PCDP AC)
- “Recommend increasing consistency between LUPAG Maps and County Zoning Maps” (PCDP AC)

1.6.2 Puna

- “Adjust LUPAG designations as appropriate to align with CDP (general recommendation, PCDP 3.2.3c)” (PCDP AC)
- “Update LUPAG map to be consistent with Village/town center concepts (PCDP 5.2.1)” (PCDP AC)

1.6.3 South Hilo

- “Remove the following future collector roads shown on the South Hilo District Transportation -Roadways map, currently included as Figure 48 in the General Plan 2005 Edition, as amended):
 - o Saddle Road/Flume Road to Puainako Street
 - o Kipuni Street to Kūkūau Street
 - o Komohana Street to Pōhakulani Street
 - o Railroad Avenue to Kekūanāʻo Street
 - o Kīpuni Street to Kupulau Road
 - o Puainako Street to Hoaka Road
 - o Waikahe Road to Alaloa Road
 - o Alaloa Road to Haihai Street
 - o Waikahe Road to Kanoiehua Avenue
 - o Kupulau Road to Railroad Avenue.” (Reso 251)

1.6.4 North Kona

- Figure 12, Map 11: “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.” (QLT letter)
- “We believe maps within Volume 1 that include the Kona Urban Area (outlined in red) should be modified to exclude National Park lands owned by the federal government. We also note that in the maps in Volume 1 and Volume 2 showing public-managed lands and federal lands (e.g., Vol 1 Figure 4-8a, Vol 2 Managed Lands), Kaloko-Honokōhau National Historical Park is not shown as a National Park, and ask that be corrected. Similarly, we ask that maps within Volume 2 that include Kaloko-Honokōhau National Historical Park within the “Kona preferred growth areas” be modified to exclude the National Park from identified potential urban growth areas.” (NPS Kaloko letter)
- Change “OPEN” designation to “URBAN EXPANSION OR LOW DENSITY” for TMKs 7-8-10: 051, 077 & 082. (Individual Comment-letter)

2 HAZARDS

2.1 General

- GENERAL COMMENT: OHA has extensive recommendations for incorporating appropriate wording and policy pertaining to Hawaiian Culture. Please see the OHA letter for more information.
- GENERAL COMMENT: Extensive recommendations are made in County Resolution Number 257-15. Please review the resolution for specific recommendations pertaining to this section.
- “We should follow the Euro model, not the Asian or North American [pertaining to environmental protection]. Rapid large sea level rise may begin sooner than generally assumed. Hawai‘i is an ant on the elephant. We cannot stop it. We can only prepare. More coastal development, sucking up our fresh water is not preparing.” (Individual Comment-email)
- “p. 5-3: Any progress improving the accuracy of Flood Insurance Rate Maps?” (NKCDP AC)
- “p. 5-4: Add 2006 earthquake. Also add Hawai‘i studies on Sea Level Rise. Storm frequency and severity may also increase with climate change. Droughts?” (NKCDP AC)
- “Add development controls for areas subject to subsidence (PCDP2.4.3)” (PCDP AC)
- “Add CIP projects that address flooding (PCDP 2.3)” (PCDP AC)
- “Prepare water management plans (PCDP 2.3.3)” (PCDP AC)
- “Develop community relief centers (general recommendation)” (PCDP AC)
- “Consider strategies that restrict grubbing and grading in flood prone areas that changes topography that could contribute to flooding.” (PCDP AC)
- “Increase emergency response capacity (PCDP3.3.1)” (PCDP AC)

2.2 Puna

- “p. 5-8: Puna - Restrict development in areas below and close to the SE Rift.” (NKCDP AC)

2.3 North Kohala

- “A seawall to protect the Māhukona picnic/camping area is desirable. Fill behind the seawall to raise and level the area is also desirable.” (NKCDP AC)

2.4 Ka‘ū

- In the District of Ka‘ū Courses of Action (presently found in sec. 5.5.9.2), amend sec. 5.5.9.2(c) as follows: “(c) Investigate potential solutions to prevent the closure of the Hawai‘i Belt Road due to flooding, including improving, acquiring, and maintaining alternate routes.” (Reso 258)

3 NATURAL RESOURCES

3.1 General

- GENERAL COMMENT: Extensive recommendations are made in County Resolution Number 257-15. Please review the resolution for specific recommendations pertaining to this section.
- “Intro, p. 4-2: We still need baseline data for pollution conditions. Can UH Hilo help? Funding?” (NKCDP AC)
- “Dogs should be included in noise pollution.” (NKCDP AC)
- “Goals and Policies are awfully vague.” (NKCDP AC)
- “Add increased specificity to GP to incorporate CDP strategies (general recommendation)” (PCDP AC)
- “Support the development and preservation of wildlife corridors” (PCDP AC)
- “Consider PCDP section 2.2.2.b.d.e” (PCDP AC)
- “I therefore suggest that the entire deforesting operation [eucalyptus harvesting] be supervised under the authority of a bonafide organic-biodynamic-permaculture expert.” (Individual Comment-email)
- “[Natural resources] Policies are excellent, but vague. Results for k, m, o, q, r, s, u, w, and x?” (NKCDP AC)
- “[Natural Resources] Guidelines for n, p, v, w?” (NKCDP AC)
- “Inappropriate and disproportionate County zoning can be adjusted in order to maintain and increase the quality of life and to preserve valued natural and cultural resources (PCDP 3.1.1.e)” (PCDP AC)
- Land Use Policies (presently found in sec. 14.1.3): Include the following policy, as written or in substantially similar language: “Incorporate the values and philosophy of the ahupua'a land division resource management system into land use policies and develop and apply regulatory decisions and other government programs, as appropriate.” (Reso 256)

3.2 Climate Change

- “We should follow the Euro model, not the Asian or North American [pertaining to environmental protection]. Rapid large sea level rise may begin sooner than generally assumed. Hawai'i is an ant on the elephant. We cannot stop it. We can only prepare. More coastal development, sucking up our fresh water is not preparing.” (Individual Comment-email)

3.3 Coastal Resources

- “The NPS supports the proposed management measures for anchialine pools (Policy ENV-1.10, ENV 1.11.). Page 2-5 lists threats to anchialine pools. The withdrawal of fresh and brackish groundwater should also be added to this section as a threat to pools (Tribble 2008; Tillman et al. 2014; Kelly & Glenn 2015). The management of groundwater quality and quantity should also be included in Policies ENV-1.10, ENV 1.11 to protect pools.” (NPS Kaloko letter)
- “A reduction in groundwater flow to the coast may also adversely affect coastal fishponds, wetlands, and nearshore ecosystems that depend upon estuarine conditions created by the discharge of fresh groundwater...” (NPS Kaloko Letter)

- “Noted there is no mapping or designation of Ala Kahakai and Shoreline Management Area (SMA) between Spencer Park going north to Kaiholena in North Kohala.” (SKCDP AC)

3.4 Invasive Species

- “Coqui frogs and little red fire ants threaten the lifestyle and property values of Big Island residents. The County should renew and expand its efforts to combat these pests.” (NKCDP AC)
- “Develop strategies for combating invasive species (PCDP 2.2.2)” (PCDP AC)
- “Where does the GP address tax incentives for native forests, restoration and abatement of invasive species? (PCDP 2.2.2.b.c.d.e)” (PCDP AC)

3.5 Pesticides

- “p. 4-3, 4-4: Include roadside herbicide in the agricultural chemical pollutants.” (NKCDP AC)
- “Also, there are some pesticide mixing sites from the sugar mills that are now toxic sites.” (NKCDP AC)
- “Herbicides ... were used to clear sugarcane when the plantations sold out. What remains in the soil?” (NKCDP AC)

3.6 Acquisition, Easements, and Tax Incentives

- “The comprehensive review should include compilation of an island wide inventory of open space and parcels of open space purchased with Public Access, Open Space, and Natural Resources Preservation funds. All open space parcels should be depicted on both an island wide map and smaller area maps, by geographic location. These maps should show current and projected open space areas.” (Reso 250)
- “Open Space: p. 14-63. Policy (d): Has this been done?” (NKCDP AC)
- “Fully utilize PONC funds (general recommendation)” (PCDP AC)
- “Reduce the minimum lot size to qualify for the native forest preservation tax reduction and allow it in any zoning district. Enrollment of a lot in this program is voluntary, but it is binding and permanent, and attached to effective measures to prevent significant clearing or other adverse alterations of the forest cover (PCDP 2.2.3.e)” (PCDP AC)
- “Offer incentives (tax breaks) for people willing to designate lands for conservation (PCDP 2.2.3d.)” (PCDP AC)
- “NKCDP Strategy 1.2. Acquire coastal lands that should be preserved as open space” (NKCDP AC)

4 SCENIC RESOURCES

4.1 Puna

- “Consider scenic turnouts and linear parks with the intent to protect the intrinsic qualities of the areas (Hwy 137)” (PCDP AC)

4.2 North Kohala

- “Is table 7-9 complete?” (NKCDP AC)
- “NKCDP Strategy 1.9. Establish a View Plane Protection Program to identify and protect areas of significant beauty along the Kohala Mountain Road and Akoni-Pule Highway corridor.” (NKCDP AC)
- “p. 7-9, 7-10 North Kohala. Place the more distinctive windward before leeward in intro. Develop the particularly striking nature of Pololū and the view. Hiking to the beach there attracts many visitors, as do the adventure activities (zip-line, ATV tours, ditch kayak rides). The views east of Hala‘ula are excellent, improve/protect them.” (NKCDP AC)
- “Coordination between the County and State is needed to upgrade the viewing of the valley wilderness area from the rim of Pololū Valley. The current lookout is too small with no room to expand and too dangerous for pedestrians. The lookout continues to be the #1 destination of visitors.” (NKCDP AC)
- “Trees? Banyans in Hāwī? Monkeypod before Aama‘koa?” (NKCDP AC)

4.3 South Kohala

- “Develop and establish view plane regulations to preserve and enhance view...” (SKCDP AC)

5 HISTORIC/CULTURAL

5.1 General

- GENERAL COMMENT: Extensive recommendations are made in County Resolution Number 257-15. Please review the resolution for specific recommendations pertaining to this section.
- “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.” (OHA letter)
- Amend the title of chapter 6 to better reflect the content of the chapter, to read as follows: Historical [and Cultural] Sites (OHA letter)
- 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. (OHA letter)
- 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.] (OHA letter)
- 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. (OHA letter)
- 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.] (OHA letter)
- 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 Hawai‘i comprise approximately 1.8 million acres of property throughout the State, or 43 percent of the State's total land area. These lands, [former Kingdom of Hawai‘i Government and Crown Lands,] were "ceded", or transferred, to the United States by the Republic of Hawai‘i, under the 1898 annexation of Hawai‘i as a Territory of the United States and after the 1893 overthrow of the Hawaiian Kingdom. The Admissions Act of 1959 that granted Hawai‘i 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 accepted by the Federal government.~~ 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 percent. The exact amount of ~~ceded~~ [public land trust] 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 letter)

- “p. 6-3, 6-4: How many of the Policies have been implemented/completed? Progress?” (NKCDP AC)
- “p. 6-1. 11,500 archeological and historic sites with 5% of the island surveyed. When will the remaining 95% be surveyed??” (NKCDP AC)
- “Advocate for improved database of historic sites (general recommendation)” (PCDP AC)
- “Awareness and appreciation of host culture is expanded (PCDP 2.1.1.d)” (PCDP AC)
- “Amendments to the County building code for structures utilizing traditional Hawaiian building design and construction methods (PCDP2.1.3.b)” (PCDP AC)
- “Inappropriate and disproportionate County zoning can be adjusted in order to maintain and increase the quality of life and to preserve valued natural and cultural resources (PCDP 3.1.1.e)” (PCDP AC)

5.1.1 Intersection of Natural and Cultural Resources

- “Address the intersection of natural resources and cultural practices.” (OHA letter)
- Amend Section 1.4: 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. (OHA letter)
- Amend Section 2.4.8.2: Resort development in the area should not destroy the natural [and cultural] resources and historical and cultural significance of the area. (OHA letter)
- 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. (OHA letter)
- 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. (OHA letter)
- 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.] (OHA letter)

5.1.2 Public Access, Appurtenant Rights, and Exercise of Traditional and Customary Practices

- “At this time the County of Hawaii ... has no formal policy to address the appurtenant rights ... already afforded by many laws and statutes ... but not in formal County policy. Please establish formal policy in native tenants, issues of no spray zones, and protection of sites

important for native gathering, hāpai wa‘a trails ... and areas critical to sustainable agriculture and fisheries...” (Individual Comment-email)

- “I do congratulate the County on the Kuleana land tax exemption.” (Individual Comment-email)
- “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 letter)
- “Add language more specifically recognizing the legal authorities that protect Native Hawaiian traditional and customary practices.” (OHA letter)
- 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.] (OHA letter)
- 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.] (OHA letter)
- 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.] (OHA Letter)
- 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. (OHA letter)
- “Hawaiians once enjoyed access to many shoreline and mauka areas that are now off limits due to private property restrictions. The County should expand its efforts to open areas to Public Access.” (NKCDP AC)
- “p. 6-2. How fully is PASH implemented?” (NKCDP AC)
- “By law, traditional and customary practices of native Hawaiians as well as the protection of public trust resources must be considered in all land use decision making policies in the County of Hawai‘i. The protection of sensitive natural and cultural resources, as defined in Policy ENV-1.5 of the Kona Community Development Plan, is critical for the survival of these cultural practices. Planning, policies, and action steps included in the General Plan should reflect this philosophy.” (Reso 250)

5.1.3 Impact Assessment and Mitigation

- Add to Section 3.3: [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.] (OHA letter)
- 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.

- 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.] (OHA letter)
- 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.] (OHA letter)
- 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.] (OHA letter)
- 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. (OHA letter)

5.2 Puna

- “Structures and cultural sites that are significant to Puna’s history and cultural traditions are preserved (PCDP 2.1.1.a)” (PCDP AC)
- “Retrieve and record information on trails and historic resources in the Puna, including research of old survey and plat maps and various records of Mahele, Land Commission and Royal Patents (PCDP 2.4.3.b)” (PCDP AC)

5.3 South Hilo

- “Villages within and outside Hilo—for example, Wāiakea Houselots, Villa Franca, Keaukaha, and the surrounding plantation towns. Celebrate them, name them, publicize their history. Give incentives to maintain and preserve housing and character of these neighborhoods.” (Individual Comment-letter)

5.4 North Kohala

- “p. 6-9 North Kohala: Update Table 6-4 of sites?” (NKCDP AC)
- “Add to Courses of Action(a): NK-CDP p. 36-7 Strategy 1.7. Implement a Policy for a Cultural and Historical Preservation.” (NKCDP AC)
- “NKCDP Strategy 1.3. Down-zone identified State-owned parcels that have special cultural and/or scenic value.” (NKCDP AC)

5.5 South Kohala

- See South Kohala CDP AC minutes for list of existing and proposed historic sites. (SKCDP AC)

5.6 North Kona

- Section 4.4.1: NPS recommendations for clarifying the cultural landscape:
 - “Cultural landscapes can range from thousands of acres of rural tracts of land to a small homestead with a front yard of less than one acre. Like historic buildings and districts, these special places reveal aspects of our country's origins and development through their form and features and the ways they were used. Cultural landscapes also reveal much about our evolving relationship with the natural world.”
 - “A cultural landscape is defined as "a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values."
 - “Historic landscapes nationwide include residential gardens and community parks, scenic highways, rural communities, institutional grounds, cemeteries, battlefields and zoological gardens. They are composed of a number of character-defining features which, individually or collectively contribute to the landscape's physical appearance as they have evolved over time. In addition to vegetation and topography, cultural landscapes may include water features, such as ponds, streams, and fountains; circulation features, such as roads, paths, steps, and walls; buildings; and furnishings, including fences, benches, lights and sculptural objects.”
 - “Most historic properties have a cultural landscape component that is integral to the significance of the resource. Imagine a residential district without sidewalks, lawns and trees or a plantation with buildings but no adjacent lands. A historic property consists of all its cultural resources--landscapes, buildings, archeological sites and collections. In some cultural landscapes, there may be a total absence of buildings.” (NPS Kaloko letter)

6 HOUSING

6.1 General

- GENERAL COMMENT: OHA has extensive recommendations for incorporating appropriate wording and policy pertaining to Hawaiian Culture. Please see the OHA letter for more information.
- GENERAL COMMENT: Extensive recommendations are made in County Resolution Number 257-15. Please review the resolution for specific recommendations pertaining to this section.
- “Homeless population. Follow the lead of cities which prioritize housing, then follow up with services. More effective to first get people off the street, then deal with their personal issues, rather than insist on sobriety in order to get housing. Banning sit/stand does not solve homelessness and loitering.” (Individual Comment-letter)
- “Highlight the need for continued efforts to address homelessness.” (OHA letter)
- “Provide for transitional shelters and services for homeless (PCDP 3.3.2c.)” (PCDP AC)
- 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.] (OHA letter)
- “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.” (OHA letter)
- “Any results for all the Policies p. 9-10, 9-11?” (NKCDP AC)
- “Plan for additional retirement communities in Town Center locations (PCDP 3.3.3g.)” (PCDP AC)
- “Consider allowing ‘ohana dwellings on ag zoned parcels (PCDP3.3.1c.)” (PCDP AC)
- “Advocate for graduated conveyance taxes to discourage property speculation (PCDP 3.1.2j, 3.2.3d)” (PCDP AC)
- “Advocate for additional “self-help” programs for affordable housing opportunities (PCDP 3.3.2e.)” (PCDP AC)
- “Advocate or support assistance programs for repair and maintenance of affordable housing (PCDP 3.3.1c.)” (PCDP AC)

6.2 South Hilo

- “Villages within and outside Hilo—for example, Waiākea Houselots, Villa Franca, Keaukaha, and the surrounding plantation towns. Celebrate them, name them, publicize their history. Give incentives to maintain and preserve housing and character of these neighborhoods.” (Individual Comment-letter)

6.3 North Kohala

- “With housing prices being so high, and economic opportunities so few, there is a significant need for affordable housing in the district.” (NKCDP AC)

- “Increase affordable housing opportunities in North Kohala” [per NKCDP p. 14, Sec. 4.3] (NKCDP AC)
- “Please work with the NKCDP Subcommittee on Affordable Housing to describe properly the number of affordable and self-help housing units in the district.” (NKCDP AC)
- “DWS has imposed a moratorium on new water commitments in North Kohala, refusing to add water meters for newly created lots. Applications to subdivide lots are therefore denied by the Planning Department based on this water unavailability. This decision by DWS has met with some bitter resentment from residents wishing to subdivide their lots as well as from developers, realtors, and prospective new additions to the community. (NKCDP AC)
- “Promote affordable housing in North Kohala? NKCDP Chapter 4.3 summarizes the need.” (NKCDP AC)
- “Promote housing for the elderly.” (NKCDP AC)
- “Support agricultural worker housing and zoning variances. NKCDP p.62-4” (NKCDP AC)
- “Encourage rental housing development in the area.” (NKCDP AC)
- “Add" Aid and encourage the development of State lands for housing for all socioeconomic levels through leasehold or purchase" (as in South Kohala)?” (NKCDP AC)

6.4 North Kona

- Add to Section 9.5.7.2: [(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.] (QLT letter)
- Add to Section 9.5.7.2: [(e) Encourage a variety of available housing options that allows for choices and flexibility for all households and income groups.] (QLT letter)

6.5 South Kohala

- “[Provide for] Kupuna housing, multi-residential and low-income housing.” (SKCDP AC)
- “Address homeless population in Kawaihae.” (SKCDP AC)
- “Encourage housing for all socioeconomic levels including for low and moderate income “gap groups” (SKCDP AC)

7 TRANSPORTATION

7.1 General

- GENERAL COMMENT: OHA has extensive recommendations for incorporating appropriate wording and policy pertaining to Hawaiian Culture. Please see the OHA letter for more information.
- GENERAL COMMENT: Extensive recommendations are made in County Resolution Number 257-15. Please review the resolution for specific recommendations pertaining to this section.

7.1.1 Bicycle/Pedestrian/Trails/Public Access

- “Public Access needs more development: shoreline and mauka-makai.” (NKCDP AC)
- “[Public Access] ... strongly encourage the County to re-write portions of Chapter 34 [concern about subsequent subdivisions, cumulative effect that circumvents public access requirements] and Planning Department Rule 21 in such a way to be more responsive to the needs of residents of all districts.” (NKCDP AC)
- “The NKCDP calls for the establishment of a County coordinator of public access to oversee the specific unresolved issues of public access and to allow for better public and user input into all decisions regarding public access.” (NKCDP AC)
- “The most district specific public access issue is the establishment of the Ala Loa as a single historic site designation and the continued effort to locate and preserve the trail for preservation and public access.” (NKCDP AC)
- “p. 7-2, Policies. Add bicycle access to the list.” (NKCDP AC)
- “Develop trail system that can provide for alternate modes of transportation, i.e. bike paths/walking paths, and provide recreation alternatives (PCDP 3.5.3, 4.5.3e.)” (PCDP AC)
- “Advocate for bike paths/lanes along highway and major roadways for alternate modes of transportation (PCDP 3.5.3d.1 & 5, 4.5.3a.)” (PCDP AC)
- “That the Road Standards be updated to ensure they accommodate multi-modal systems.” (KCDP AC)
- “Appropriate General Plan policies should include requirements that the County develop a formal public access program, to include maps of existing trails from all jurisdictions as well as potential new locations for trails, including trail connections and extensions. The County should coordinate its public access development initiatives with the appropriate state and/or federal agencies.” (Reso 250)

7.1.2 Mass Transit

- “Prepare a County-wide Transit Master Plan to provide an overall framework for transit improvements while incorporating user input from each district (PCDP 4.2.3.a)” (PCDP AC)
- “The Mass Transit plan/strategy in the Kona CDP be either incorporated in or be acknowledged by the General Plan.” (KCDP AC)
- “Online ride share or carpool match services. Lyft, Uber for rides; City Car Share works great; bike sharing (leave bike at certain stations); other innovative ways for people to travel besides having to own a car.” (Individual Comment-letter)

- “If the Mass Transit Master Plan for Hawai‘i County is completed in sufficient time, incorporate it into the General Plan update.” (Reso 237)
- “Incorporate provisions into the General Plan to assure that Mass Transit policies and facilities are compliant with the Americans with Disabilities Act.” (Reso 237)
- “The comprehensive review should include an island wide analysis of the County's existing mass transit system, including all transit routes, fixed transit routes, paratransit lines, and any proposed transit routes and/or transit hubs as possible. The comprehensive review should also consider the island wide Mass Transit Master Plan if it is completed in a timely manner within the comprehensive review timeline. These route systems should be depicted on both an island wide map and smaller area maps, by geographic location.” (Reso 250)

7.1.3 Streets/Other

- “Hilo is rainy. Make surfaces permeable rather than paved. See San Francisco where sidewalks, parking lots are built with rain-permeable materials to absorb rain rather than create run-off. Our frequent heavy rains makes for uncontrolled run-off in the streets and drains into the ocean.” (Individual Comment-letter)
- “Traffic calming techniques to slow cars down on appropriate streets.” (Individual Comment-letter)
- “p. 13-2 and 13-5 Policies. Bicycle pathways are highly subordinate. Make a special policy for them.” (NKCDP AC)
- “p. 13-4. Homestead roads is an interesting section. Will someone explain its ramifications for Kohala?” (NKCDP AC)
- “Consider improvement districts to fund infrastructure improvements (PCDP 3.1.3d.2.)” (PCDP AC)
- “Advocate for specialist that seeks funding for road projects (general recommendation)” (PCDP AC)
- “Advocate for more emergency call boxes along highways (PCDP 3.4.3d.)” (PCDP AC)
- “That the Road Standards be updated to ensure they accommodate multi-modal systems.” (KCDP AC)
- “The references to the minimum right-of-way widths in Section 13.3.4 be deleted.” (KCDP AC)

7.2 Puna

7.2.1 Bicycle/Pedestrian/Trails/Public Access

- “Develop trail system that can provide for alternate modes of transportation and provide recreation alternatives (PCDP 3.5.3, 4.5.3e.)” (PCDP AC)

7.2.2 Mass Transit

- “Include all of Puna CDP Section 4.2 on Mass Transit (MTS recommendation)” (PCDP AC)
- “Transit service and improvements reinforce and complement village/town centers (PCDP 4.2.1.b)” (PCDP AC)

7.2.3 Streets/Other

- “Not once was community input allowed despite spending millions writing one that made sense. The urban developers took over. The roads not paid for all go through the Hawaiian acres pure agricultural subdivision against emergency response.” (Individual Comment-email)
- “Additional unclear comments on roadways and connectivity locations.” (Individual Comment- email)
- “As part of “safe routes to school” initiative, open Lauko Road to provide better access to Mt. View school (general recommendation, PCDP 4.5.2)” (PCDP ACP)
- “Implement CERS recommendations (general recommendation)” (PCDP AC)
- “Use CERS information to improve connectivity between communities/subdivisions (PCDP 4.3.2a.)” (PCDP AC)
- “Provide more specificity pertaining to Puna roadways (general recommendation)” (PCDP AC)
- “Consider including alternate route for Highway 11 from Volcano to Highway 130” (PCDP AC)
- “Consider paving Beach Road and keep open (general recommendation)” (PCDP AC)
- “Keep GP policy on developing mid-level roadway Makai of Highway 130 (PMAR) (PCDP 4.3)” (PCDP AC)
- “Consider paving Railroad and keep open to traffic (general recommendation)” (PCDP AC)
- “Makai route from Hawaiian Beaches to Paradise Park with connection from Railroad to South Hilo (GP: 13.2.5.1.2.a). Develop PMAR along general route shown in Figure 4-1, with specific design and alignment to be determined based on an environmental impact study that identifies a project having the least socio-economic impact (PCDP 4.3.2.b)” (PCDP AC)

7.3 South Hilo

7.3.1 Mass Transit

- “Major transit hubs, e.g., Civic Auditorium seems to have become a place for car to bus transfers. Ideal because of ample parking and room for buses. Improve bike access. Lights for evening use. Run frequent shuttles to downtown, university, Kūhiō Plaza.” (Individual Comment-letter)
- “Minor transit hubs, e.g., Komohana/Puainako off-road parking where people can ride share, park and transfer to bus/bike/walk.” (Individual Comment-letter)

7.3.2 Streets/Other

- “Beautify Kanoelehua Av, Kamehameha between Keaukaha and soccer fields. Show off the open space, proximity to ocean, rainforest. Plant trees to create shaded walkways. Install rain shelters, seating.” (Individual Comment-letter)
- “Remove the following future collector roads shown on the South Hilo District Transportation-Roadways map, currently included as Figure 48 in the General Plan 2005 Edition, as amended):

- o Saddle Road/Flume Road to Puainako Street
- o Kīpuni Street to Kūkūau Street
- o Komohana Street to Pōhakulani Street
- o Railroad Avenue to Kekūanāo'a Street
- o Kīpuni Street to Kupulau Road
- o Puainako Street to Hoaka Road
- o Waikahe Road to Alaloa Road
- o Alaloa Road to Haihai Street
- o Waikahe Road to Kanoelehua Avenue
- o Kupulau Road to Railroad Avenue.” (Reso 251)

7.4 North Kohala

- “p. 13-11 North Kohala. General road improvements (list?). NKCDP Strategy 4.6 p. 79-80.
- “We need more sidewalks and bicycle paths linking Hāwī and Kapa’au. Maybe linking the schools too?” (NKCDP AC)
- “NKCDP Strategy 2.1. Provide for substantive community input to the County Planning Department and the County Council in order to formalize and accept priority shoreline access easements.” (NKCDP AC)
- “Pratt Road parallels the highway on the makai side but is gated and overgrown in several places. Pratt Road should be prepared to act as an emergency bypass should the highway become blocked. (NKCDP Strategy 4.6 p. 79-80).” (NKCDP AC)
- “Action on (c)! [Improve mauka-makai county maintained homestead roads and encourage improvement of the non-county owned roads by the State of Hawai’i or private subdivisions.]” (NKCDP)
- “p. 13-20. North Kohala Harbors: do we want to list the Boat Ramp issue? NKCDP Strategy 4.2 p. 73” (NKCDP AC)

7.5 North Kona

- Amend Section 13.2.5.7.2: (p) ~~Construct the proposed Shore Drive from the Old Kona Airport Park to the Kealakehe Drive intersection.~~ [Connect Kuakini Highway from Kaiwi Street to Kealakehe Parkway.] (QLT letter)
- Add to Section 13.2.5.7.2: [(z) Connect Makala Boulevard from Queen Ka’ahumanu Highway to the Mid-Level Road.] (QLT letter)
- “...we request all references to the frontage road within the National Park boundaries, Phase II – National Park Service, Section (page 4-8, and Section 5.3 Implementation Matrix) be removed from the plan.” (NPS Kaloko letter)
- “To successfully follow the spirit of the CDP and to help achieve its goals, we seek that the revised County General Plan identify specific areas within North Kona where TOD development should be encouraged, areas where it should be not allowed or discouraged, and a limit be placed on the number of potential TODs.” (NPS Kaloko letter)
- “The Kona Circulation Plan either be incorporated in or be acknowledged by the General Plan.” (KCDP AC)

- “The North and South Kona Transportation Courses of Action be deleted and the specific recommendations of the Kona COP either be incorporated in or be acknowledged by the General Plan.” (KCDP AC)

7.6 South Kona

- “The Kona Circulation Plan either be incorporated in or be acknowledged by the General Plan.” (KCDP AC)
- “The North and South Kona Transportation Courses of Action be deleted and the specific recommendations of the Kona COP either be incorporated in or be acknowledged by the General Plan.” (KCDP AC)

8 WATER

8.1 General

- GENERAL COMMENT: OHA has extensive recommendations for incorporating appropriate wording and policy pertaining to Hawaiian Culture. Please see the OHA letter for more information.
- GENERAL COMMENT: Extensive recommendations are made in County Resolution Number 257-15. Please review the resolution for specific recommendations pertaining to this section.
- “... OHA consistently advocates for appropriate water management practices and compliance with laws that protect both Native Hawaiians and the larger Hawai'i community.” (OHA letter)
- “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... Add discussion of the constitutionally, statutorily, and judicially-recognized protection of water rights ” (OHA letter)
- 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.] (OHA letter)
- 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.] (OHA letter)
- 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.]
- 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.] (OHA letter)
- 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.] (OHA letter)

- “The County should expand a program to upgrade the distribution infrastructure and find ways to assure that agricultural water is distributed to agricultural producers.” (NKCDP AC)
- “p. 11-4. Water. Policies are great, particularly (c) Improve and replace inadequate systems and (j & o) improve and expand agricultural water. Do these!” (NKCDP AC)
- “Plan for County infrastructure improvements that serve Village Town Center locations (PCDP 3.4.3)” (PCDP AC)
- “Strategies to improve infrastructure in substandard subdivisions (general recommendation, PCDP 3.1.2)” (PCDP AC)
- Golf Courses and landscaping should be denied “potable” water. Should use reclaimed water. (SKCDP AC)
- “Due to limitation of potable water resources, personal swimming pools and ponds should be addressed.” (SKCDP AC)

8.2 Puna

- “Add strategies to assist Puna communities to develop water systems, public and private (general recommendation)” (PCDP AC)

8.3 North Kohala

- “Assist in the further development of agriculture, including forestry and aquaculture activities. Necessary capital improvements that will aid agriculture, such as water, should be given priority for funding. (from N. Kona section).” (NKCDP AC)
- “DWS is negotiating to add a well at Hala’ula and is encouraged to add another to the west of Hāwī (the Kealahewa well).” (NKCDP AC)
- “All of these wells [Makapala & Hāwī 1 & 2] should be interconnected to provide redundancy in Kohala should any single pump fail.” (NKCDP AC)
- “Reopening some of the Kohala [Ditch] tunnels as well as some of the existing but unused stream diversions could further enhance supply, perhaps even to the pre-earthquake flows of 23 mgd. Restoring the old distribution mauka-makai pipes or perhaps creating new ones would result in a robust system of agricultural water to current and future agricultural users and relieve possible impacts on expensive potable water.” (NKCDP AC)

8.4 South Kohala

- “Kohala Ranch Water Co. should be included in the South Kohala water source listing.” (SKCDP AC)

8.5 North Kona

- Kona Mauka Watershed Program, Policy ENV-1.2: “The NPS strongly supports this policy. Protecting the ecosystem services of the groundwater recharge area is critical to protecting a clean water supply for public health, fisheries, subsistence, recreation, and tourism.” (NPS Kaloko letter)

- Water Quality Monitoring, Policy ENV 1.12: “The NPS supports the creation of a county-wide water quality monitoring program that would provide data collected under a protocol that includes standardized quality assurance/quality control methods. While monitoring alone does not protect groundwater, we do support the creation of a water quality monitoring program.” (NPS Kaloko letter)
- Urban Stormwater Management. Policy PUB–4.7: “The NPS supports the underlying principles of Kona CDP stormwater management guidelines and agrees with the implication natural and cultural resources are at risk from polluted runoff carried by rainwater. However, the Kona CDP does not clearly recognize that the County Codes for drainage wells currently do not address protection of significant public trust resources, but rather solely consider flood control and volume of runoff. Specifically, the design specifications of drainage wells in compliance with the Hawai‘i County Public Works and State Department of Health standards do not inherently incorporate any structure or other design feature to remove petroleum, oil, or any contaminants contained in runoff. Additionally the Kona CDP does not mention or commit to incorporate the Implementation Plan for Polluted Runoff Control or Coastal Nonpoint Pollution Control Program Management Plans for the state of Hawai‘i into this proposed policy. These plans remain without final approval by the Environmental Protection Agency and the National Oceanic and Atmospheric Administration in part because County standards are only designed for flood control purposes and not for controlling nonpoint source pollution (National Oceanic and Atmospheric Administration and U.S. Environmental Protection Agency 1998). We encourage the County of Hawai‘i to commit to adopting Hawai‘i’s Implementation Plan for Polluted Runoff Control and/or Hawai‘i’s Coastal Nonpoint Pollution Control Program Management Plan.” (NPS Kaloko letter)

9 WASTE

9.1 General

- GENERAL COMMENT: OHA has extensive recommendations for incorporating appropriate wording and policy pertaining to Hawaiian Culture. Please see the OHA letter for more information.
- GENERAL COMMENT: Extensive recommendations are made in County Resolution Number 257-15. Please review the resolution for specific recommendations pertaining to this section.

9.1.1 Solid waste

- “Recycling. A must. Make it easy by reducing the need to sort; have bulk bins with sorting done after.” (Individual Comment-letter)
- “The County should expand its efforts to implement robust island-wide green waste to compost/mulch facilities and community waste reduction and recycling programs.” (NKCDP AC)
- “Find a way out of the” Put-or-Pay contract at the West Hawai’i Landfill. This costs the County unnecessarily and nobody should be allowed to charge for not putting enough stuff in the landfill! We should be minimizing input!” (NKCDP AC)
- “What is in the County Solid Waste Management Plan?” (NKCDP AC)
- “p. 10-24 Residential Pay-As-You-Throw User Fees are likely to contribute to illegal dumping in rural North Kohala gullies.” (NKCDP AC)
- “Policy (f) recycling is BIG. (g) green waste too. Do these! Be specific. See#2 on p. 1 of this document.” (NKCDP AC)
- “A compost facility should join the mulch facility at Pu’uanahulu.” (NKCDP AC)

9.1.2 Wastewater

- “Wastewater, Sewer Priorities Policy PUB–4.4: The NPS agrees that connections to appropriate sewer systems are required to protect water quality. However, scientific research indicates placing such requirements only within 1 mile of the shoreline is not adequate protection for coastal cultural and natural public trust resources. It should be recognized that nutrient inputs from upslope wastewater effluent (existing cesspools, existing septic systems and new septic systems) flow towards the coast in the groundwater and will add to the effluent generated at the coast (Parsons et al. 2008; Johnson & Wiegner 2013). It should also be recognized that large private wastewater systems are not required to do additional nutrient-removal. Additional measures should be included in this policy to require the best technologies available to remove excess nutrients from these systems and the county wastewater treatment plants.” (NPS Kaloko letter)
- “Is there a projected timeframe for the State's rules prohibiting installation of cesspools?” (NKCDP AC)
- “p. 11-18. Sewer Policies. Phase out new cesspool permits.” (NKCDP AC)
- “Encourage State legislation to prohibit the use of cesspools (PCDP 2.3.3a)” (PCDP AC)
- “Develop strategies to improve wastewater treatment (PCDP 2.3.2)” (PCDP AC)

9.2 Puna

9.2.1 Solid waste

- “General plan gives 4 transfer stations to 200 People. Removed all public used roads in Commercial zoning and it's precept is only for eminent domain.” (Individual Comment-email)

9.2.2 Wastewater

- “Aquifers [that] could be used for future community wells in high growth low elevation areas are protected from pollution by untreated Wastewater disposal systems. GOAL: (PCDP2.3.1.a) & (PCDP2.2.3.e)” (PCDP AC)
- “Encourage state legislation to prohibit cesspools as a means for wastewater disposal in areas below 1,000 feet Mean Sea Level, with the objective of protecting both water quality in coastal areas, as well as in the aquifer, particularly the portion underlying State-owned lands in the Maku’u area, where there is potential to develop the source for community potable water wells and agricultural irrigation purposes. OBJECTIVE (PCDP 2.3.2.a)” (PCDP AC)

9.3 North Kohala

9.3.1 Solid waste

- “North Kohala still needs a green waste chute [at Ka’auhuhu] to reduce input to the landfill and recycle it into more useful products.” (NKCDP AC)
- “The transfer station is outgrowing the present site and should be relocated, preferably to State-owned lands west of Hāwī. The NKCDP Strategy 4.1 (p. 72-3) states, Repair and relocate the Solid Waste Transfer Station.” (NKCDP AC)
- “Get a hazardous waste drop-off in North Kohala.” (NKCDP AC)

9.4 South Kohala

9.4.1 Wastewater

- “Address issue of Puakō area not having access to Mauna Lani waste treatment facility.” (SKCDP AC)
- “More wastewater facilities for irrigation and energy needs.” (SKCDP AC)

9.5 North Kona

9.5.1 Solid waste

- Add to Section 11.6.4.7.2: [(c) Allow connection to Kealakehe Wastewater Treatment Plant if feasible, in particular for developments in close proximity to the facility.] (QLT letter)

10 UTILITIES

10.1 General

- GENERAL COMMENT: OHA has extensive recommendations for incorporating appropriate wording and policy pertaining to Hawaiian Culture. Please see the OHA letter for more information.
- GENERAL COMMENT: Extensive recommendations are made in County Resolution Number 257-15. Please review the resolution for specific recommendations pertaining to this section.

10.2 Telecommunications

- GENERAL COMMENT: Extensive recommendations are made in County Resolution Number 257-15. Please review the resolution for specific recommendations pertaining to this section. See "Exhibit C" of reso 257-15.
- "The County should expand its efforts to ensure that DSL cable reaches all areas." (NKCDP AC)
- "Support HCCDA to implement an Emergency Ham radio repeater system that reaches the entire island." (NKCDP AC)
- "Set standards to get high-speed (10 mb/s) internet available to all homes." (NKCDP AC)
- "Advocate for increased cell phone coverage to improve communications but ensure that cell phone towers blend in with the natural environment (PCDP 3.4.3e)" (PCDP AC)
- "Advocate for improved internet access (PCDP 3.4.3c)" (PCDP AC)
- "Advocate for phased undergrounding of utility lines" (PCDP AC)

10.3 Energy

10.3.1 General

- "The island has a potential for renewable energy generation as high as any place on Earth and it could become an example of good energy practices ... while concomitantly reducing user costs significantly." (NKCDP AC)
- "The transmission grid also needs renovating and conversion to a smart grid as well. The County should set this as very high priority." (NKCDP AC)
- "Have any of the bulleted points on p. 3-4 been implemented to completion?" (NKCDP AC)
- "Do more than" Encourage" the development of alternative energy sources. Encourage projects that stabilize alternative energy production such as wind and hydro projects. Set specific goals and timelines." (NKCDP AC)
- "Do we still have a State Energy Coordinator? What does he or she do? HNEI too?" (NKCDP AC)
- "Improve the grid to overcome HELCO's (somewhat arbitrary) cap on % renewables on any sub-grid." (NKCDP AC)
- "11-1 Goals should include lower electric rates and energy independence based on renewables." (NKCDP AC)

- “11-13, 4, 5. Electricity: Update Descriptive Intro. The Big Island can be ENTIRELY alternative. HELCO should be phasing out fossil-fuel-based generation, not planning new ones.” (NKCDP AC)
- “Keep GP policy to encourage energy research and development but focus on renewable energy (PCDP 3.6.3)” (PCDP AC)
- “Strategies to improve infrastructure in substandard subdivisions (general recommendation, PCDP 3.1.2)” (PCDP AC)
- “Establish LEED standards for buildings (PCDP 3.6.3)” (PCDP AC)
- “Provide additional property tax incentives for energy efficient homes (PCDP 3.6.1)” (PCDP AC)
- “Pursue new renewable energy sources; through ocean energy or enterprise subzone (PCDP 3.6.3i.)” (PCDP AC)
- “Advocate for phased undergrounding of utility lines” (PCDP AC)

10.3.2 Bio-energy

- “Biomass conversion should not include green waste unless it is available in excess of ag. mulch/compost needs. Big Island soil health is a priority.” (NKCDP AC)
- “Do NOT” Encourage the development and use of agricultural products and by-products as sources of alternative fuel” if they can be utilized as compost or mulch.” (NKCDP AC)

10.3.3 Geothermal

- “Geothermal. Include new Hualālai exploration if approved. Expand BI capacity!” (NKCDP AC)
- “Subject to the requirements of state law, the relevant Hawai‘i County Planning Commission should have the authority to regulate future geothermal development in Hawai‘i County.” (Reso 250)
- “Additional development of geothermal resources should mitigate impacts to people by the use of best available control technology.” (Reso 250)
- “Additional development of geothermal resources that are not part of the previously approved Geothermal Resource Permit 2 production facilities should, to the extent possible, avoid inhabited areas.” (Reso 250)
- “Enhanced monitoring measures should continue to be conducted.” (Reso 250)
- “Health impact studies should continue to be conducted and the findings and recommendations from those studies be made available to the public and implemented.” (Reso 250)

10.3.4 Solar

- “Solar hot water, electricity generation. Even in Hilo, this works.” (Individual Comment-letter)
- “Net metering should be realistic. HELCO's present program has exchange rates that undermine potential benefits. HELCO should pay back for energy received at a rate approaching the rate at which they sell.” (NKCDP AC)

10.4 Puna

10.4.1 Telecommunications

- “Advocate for telecommuting opportunities (PCDP4.1.3b)” (PCDP AC)

10.4.2 Energy

- “ADD all 3 sections (PCDP 3.6.2.a,b,c)” (PCDP AC)
- “Review (PCDP 3.6.3 actions) and ADD [to GP]” (PCDP AC)
- “Advocate for additional funds from PGV to be used in Puna for infrastructure improvements (general recommendation, PCDP 3.6.1d, 3.6.3g)” (PCDP AC)
- “Limit expansion of PGV (general recommendation, PCDP 3.6)” (PCDP AC)

10.5 South Kohala

10.5.1 Energy

- “Support all energy public facilities that does not affect view planes.” (SKCDP AC)

11 PUBLIC SAFETY

11.1 General

- GENERAL COMMENT: OHA has extensive recommendations for incorporating appropriate wording and policy pertaining to Hawaiian Culture. Please see the OHA letter for more information.
- GENERAL COMMENT: Extensive recommendations are made in County Resolution Number 257-15. Please review the resolution for specific recommendations pertaining to this section.
- “Get police out of their cars to mix with the public. If people are out on the street, then police should be there too. Build relationships.” (Individual Comment-letter)
- “Graffiti abatement—immediate removal is important to deter more tagging. Could service clubs take this on with County support?” (Individual Comment-letter)
- “Any thoughts on Fire and Police?” (NKCDP AC)
- “p. 10-12: Civil Defense: Has the County developed a database of disaster events yet?” (NKCDP AC)
- “p. 10-14 Policies: Expand, train, and equip Community Emergency Response Teams (CERTs).” (NKCDP AC)
- “An operating island-wide Ham radio repeater network for HCCDA emergency net. All CERT Teams need to reach this to report in.” (NKCDP AC)

11.2 North Kohala

- “p. 10-16, North Kohala: Hisaoka Gym at Kamehameha Park is an emergency shelter. AED locations at FD, hospital and in Hāwī town. NK CERT has 31 active members trained in emergency response.” (NKCDP AC)
- “p. 10-20 North Kohala Gov't Operations: Add Senior Center and Intergenerational Center?” (NKCDP AC)

12 PARKS

12.1 General

- GENERAL COMMENT: OHA has extensive recommendations for incorporating appropriate wording and policy pertaining to Hawaiian Culture. Please see the OHA letter for more information.
- GENERAL COMMENT: Extensive recommendations are made in County Resolution Number 257-15. Please review the resolution for specific recommendations pertaining to this section.
- “I would like to focus on a low cost/high impact project in the Recreational area since it would be very achievable with high usage and visibility. Multi-use paths: The creation of multi-use walking/bike paths to existing recreational areas as mentioned in section 12.3.m would have high impact with the consistent pleasant weather on the West Side.” (Individual Comment-email)
- “p. 12-2: is there a new County of Hawai‘i Recreation Plan? I see nothing on the web.” (NKCDP AC)
- “Public Access is big in this section and should be stressed/encouraged” (NKCDP AC)
- “Consider wildlife corridors and utilizing native plants for landscaping in park projects.” (PCDP AC)
- “Consider additional CIP projects for recreation facilities consistent with CDP (general recommendation)” (PCDP AC)
- “Provide PCDP specificity for development of parks, including coastal parks (PCDP 3.5.3)” (PCDP AC)
- “Develop and maintain new and existing trails, forest and coastal (PCDP 3.5.2, 3.5.3)” (PCDP AC)
- “Consider adding “Friends of the Park” policy (general recommendation)” (PCDP AC)
- “Develop policies for linear parks (PCDP 3.5.3d)” (PCDP AC)
- “Develop trail system that can provide for alternate modes of transportation, i.e. bike paths/walking paths, and provide recreation alternatives (PCDP 3.5.3, 4.5.3e.)” (PCDP AC)

12.2 Puna

- “Complete the P.O.N.C. purchase of the Vacation Land Legacy Property adjacent to the Wai‘ōpae Reserve and implement plans to provide alternative shoreline access to the Reserve and at the southern end of the property, provide access for fishing (general recommendation, PCDP 3.5.3e.2)” (PCDP AC)
- “Consider additional CIP projects for ocean swimming areas at Pohoiki/Isaac Hale Beach Park” (PCDP AC)

12.3 North Kohala

- “Community park proposed for Kāhei area? I've never heard of this.” (NKCDP)
- “Profile: Since 1993 the County has relied on conditions to the resort permits at Māhukona to provide funds for the upgrading of Māhukona and Kapa' a Parks. The resort plans have been dropped and the County needs to make up for years of neglect of both parks. The restroom facilities and pavilion are in disrepair and need to be rebuilt. The picnic and camping area need

to be refurbished. Potable water needs to be supplied and the electrical system upgraded. Improvements to Kapa' a Beach Park include accommodations for camping and passive recreational uses, electric power, potable water, and the construction of restrooms and additional parking.” (NKCDP AC)

- “Kamehameha Park:
 - o Scoreboard replaced/ but too small for main field, will move to Veterans field when multipurpose scoreboard arrives— on order
 - o Bleacher machine still on order, No date yet.
 - o Hisaoka gym roof replacement is in progress— tbc 4/30
 - o Gateball concession and storage plans ready, need to start—after stage cover
 - o Stage cover plans ready, need to start— tbc 6/ 30” (NKCDP AC)
- “The county has just acquired a 1 acre parcel near the banyan trees in downtown Hāwī. Encourage the construction of a public restroom and a parking area in this area by the county.” (NKCDP AC)
- “Improve parking and lookout facilities at Pololū.” (NKCDP AC)

13 OTHER TOPICS

13.1 Health

- “Keep GP policy to develop new or improve existing health care facilities but apply to entire island (general comment from AC, PCDP 3.3.2)” (PCDP AC)

13.2 Education

- GENERAL COMMENT: Extensive recommendations are made in County Resolution Number 257-15. Please review the resolution for specific recommendations pertaining to this section.
- Amend Section 10.2.3: (b) State Department of Education’s education specifications and standards for facilities [, as well as addressing 21st century school concepts in its approach.] (QLT letter)
- “p. 10-2. Policy(e): Add an explanation of how the district CDPs fit in. (NKCDP AC)
- “Explore use of existing school facilities to implement after school education opportunities (general recommendation, PCDP 3.3.2)” (PCDP AC)
- “As part of “safe routes to school” initiative, open Lauko Road to provide better access to Mt. View school (general recommendation, PCDP 4.5.2)” (PCDP AC)

13.2.1 North Kohala

- “p. 10-9 North Kohala: In the school year 2014-2015, Kohala Elementary School (grades k-5) enrollment is 353, Kohala Middle School (grades 6-8) is 84 and Kohala High School (grades 9-12) is 256. The existing facilities is sufficient for the current district needs.” (NKCDP AC)
- “The Bond library no longer exists. The new North Kohala Public Library opened its doors in 2010.” (NKCDP AC)

13.2.2 South Kohala

- Support new high school (SKCDP AC)

13.3 Economic

- GENERAL COMMENT: Extensive recommendations are made in County Resolution Number 257-15. Please review the resolution for specific recommendations pertaining to this section. See “Exhibit C” of reso 257-15.

13.3.1 Agriculture

- Amend goal (c) in section 14.2.2 on page 14-17 to read as follows: [Preserve and enhance opportunities for the expansion of Hawai’i’s Agricultural Industry and for the encouragement of local food production.] (OHA letter)
- “Agriculture: p. 14-16: ... Add a line to encourage a BI slaughterhouse and packing facility?” (NKCDP AC)
- “Create a real property tax exemption (perhaps 4 to 6 years) for farmers entitled to Federal crop loss insurance (PCDP 3.2.3.o)” (PCDP AC)

- “The County should consider establishing and promulgating ordinances, rules and regulations relating to medical marijuana production centers and medical marijuana dispensaries that are consistent with applicable State law.” (Reso 253)
- “Lands where licensed medical marijuana production centers or licensed medical marijuana dispensaries may be permitted, under applicable State and County laws, should be identified within Hawai‘i County.” (Reso 253)

13.3.2 Puna

- “Develop strategies that support and encourage ag tourism (PCDP 3.2.2g)” (PCDP AC)
- “Add CDP specificity on business incubator districts (PCDP 3.2.3a)” (PCDP AC)
- “Advocate for telecommuting opportunities (PCDP 4.1.3b)” (PCDP AC)
- “Local job growth is primarily in “green” industries such as agriculture, alternative energy, communications technology, eco-tourism and natural resources management (PCDP 3.2.1.g)” (PCDP AC)
- “Create new “green” opportunities in the agricultural, alternative energy, and natural resources management in Puna (PCDP 3.2.2.k)” (PCDP AC)

13.3.3 North Kohala

- “Many would like to see diversified agriculture encouraged in the region [North Kohala].” (NKCDP)
- “Assist in the further development of agriculture, including forestry and aquaculture activities. Necessary capital improvements that will aid agriculture, such as water, should be given priority for funding. (from N. Kona section).” (NKCDP AC)
- “NKCDP Sec. 4.1: ... economic strategies such as large-scale residential or industrial development are not supportive of the goal of protecting Kohala's rural character. Many residents see diversified agriculture as one of the best options for creating jobs and local businesses, since it utilizes Kohala's natural resources(fertile soils, availability of water), helps increase the community's self-sufficiency, and protects its rural character.” (NKCDP AC)

14 GENERAL PLAN STRUCTURE AND IMPLEMENTATION

14.1 General

- GENERAL COMMENT: appendix 1 of the NPS Kaloko letter details inaccuracies in the Kona CDP related to the NPS units in West Hawaii. (NPS Kaloko letter)
- "... encouraged to seek public and professional input and consult and collaborate with stakeholders most affected by the Urban Land Institute's Building Healthy Places Toolkit report" (State Senate resolution No. 121)
- "The hardest part of getting the community involved was getting them to define a solid and representative vision." (Individual Comment-email)
- "...you can find out more about the program [grant] on the Orton Family Foundation website." (Individual Comment-email)
- "Quality strategic planning decisions for our island are best made with valid population growth projections, understanding the need to honor community identity (sense of place), always thinking long term and big picture, and knowing what reliable funding sources are available prior to taking action." (Individual Comment-letter)
- "Effective long term planning requires that private and public sectors work with the general public to create partnerships, which work collaboratively in common cause to benefit all participants." (Individual Comment-letter)
- "...the roles and responsibilities of the County and State of Hawaii need to be clearly identified and reviewed." (Individual Comment-Letter)
- Purpose of the General Plan (presently found in sec. 1.1): Include the following purpose, as written or in substantially similar language: "Utilize the geographical features of the ahupua'a land divisions and the historical use of the ahupua'a land divisions as the basis for identifying important values and priorities and for developing and applying appropriate regulatory decisions and other government programs in this County." (Reso 256)
- General Plan Program (presently found in sec. 1. 3): Add the following, as written or in substantially similar language, to the discussion contained in the General Plan Program section or in another appropriate section: "Recent studies have revealed that the use of the ahupua'a as the basis for land use as a model is relevant to the County of Hawai'i's desire to achieve sustainability goals. For this reason, when reviewing and implementing the Goals, Policies, and Courses of action set forth in each of the fourteen (14) study elements, the County of Hawai'i shall require that each study element be analyzed, studied, and implemented in context of the ahupua'a as a land use model." (Reso 256)
- "We categorically reject all aspects of the general plan, Cdp, and loss of civil, economic, social liberties and loss of all agricultural and conservation rights. It's negative repercussions of all emergency response." (Individual Comment-email)
- "Since 1989 general plan it is proved that it was falsely written to benefit only white people from other states. This has cost us 250 million in Damages. It's an excuse of land grabbing for foreign developers." (Individual Comment-email)

- “We reject the general plan as racist and ethnocentric, and rewritten by private lobbyists.” (Individual Comment-email)

14.2 Format of the General Plan

- GENERAL COMMENT: Extensive recommendations are made in County Resolution Number 257-15. Please review the resolution for specific recommendations pertaining to this section. See “Be it resolved” section and “Exhibit A” of reso 257-15.
- “The Implementation section needs to be updated as well.” (NKCDP AC)
- “...look at the recently adopted Maui Island Plan and use their plan as our template.” (KCDP AC)

14.3 CDPs

- “Planning Department needs to ensure that the key goals, policies, and actions identified in the Kona COP are either incorporated in or acknowledged by the General Plan.” (KCDP AC)
- “The individual CDPs goals objectives, policies and actions have precedence over the broad strokes that the general plan provides.” (KCDP AC)
- “We believe they [CDPs] should be integrated throughout the entire Plan document.” (NKCDP AC)
- “p. 14-54 Policies (d)-add CDPs.” (NKCDP AC)
- “p. 14-65 Policies(b)-add CDPs.” (NKCDP AC)
- “Is it still necessary to outline the creation of individual CDPs? Aren't they already in progress?” (NKCDP AC)
- “Requesting clarification on the roles of the CDPs and the Action Committees (general recommendation)” (PCDP AC)
- “p. 15-2 paragraph#4: The Community Development Plans shall focus on action. The courses of action specified in each element of the General Plan need greater detail and need to be coordinated by district. The Action Committees shall provide that detail, advising the Planning Department on the needs in their district. They shall also act as advocates for the wishes of their constituents, pressing when necessary for their requests and assuring that procedures are properly followed.” (NKCDP AC)

14.4 Capital Improvements

- “Strategies to improve infrastructure in substandard subdivisions (general recommendation, PCDP 3.1.2)” (PCDP AC)
- “Use of village/town center concepts to target infrastructure investments (PCDP 5.2)” (PCDP AC)
- “Use of improvement districts for infrastructure financing (PCDP 3.1.3d.2.)” (PCDP AC)
- “Encourage village plans to guide growth and provide centralized services (PCDP 3.1.2d)” (PCDP AC)
- “Consider alternate LOS criteria for determining minimum LOS (general recommendation)” (PCDP AC)
- “The County developer fair share commitment policy needs review to ensure land/facility dedication or required fair share funding is received from this source. Creating special

assessment districts for new facilities and services rather than relying on general fund financing is needed.” (Individual Comment-letter)

- “Funding resources, whether from the public or private sectors, need to be in place prior to the approval of applications for new development or expansion of current communities.” (Individual Comment-letter)
- “Designate specific CIP projects to improve services to underserved communities experiencing higher growth (PCDP 3.1.1c)” (PCDP AC)