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North Kohala Community Development Plan Action Committee

May 11, 2015

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

**SUBJECT: Comments for the Comprehensive Review of the County of Hawaii
 General Plan**

Dear Mr. Kanuha,

Please find attached the results of our Investigatory Subcommittee formed to review the County General Plan that was approved at our May 11, 2015 North Kohala CDP Action Committee meeting. We hope you will consider our recommendations and incorporate them in the next Plan.

Please don't hesitate to contact me if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "John Winter", is written over a light blue horizontal line.

John Winter, Chair
North Kohala Community Development Plan Action Committee

Enclosure: North Kohala CDP AC – Review of General Plan

North Kohala CDP AC
Report of Investigatory Subcommittee to Review the County General Plan
John Winter, Jon Adams, Joe Carvalho, Keone MacKillop

As a general impression the Plan is well written and addresses a broad spectrum of County needs, desires, responsibilities, and projects. Most sections outline an appropriately broad set of Policies, Standards, and Courses of Action, but the wording is often quite vague (“Encourage...”, “Support...”, “Investigate...”, “appropriate...”, “Assist in...”, “Strive for...”, “Ensure...” etc.). It is difficult for us to ascertain what actual options the County offices can actually employ in each instance. Even when more definite terms are used (“Implement...”, “Designate....”, etc.), results are difficult to evaluate. This is what the Annual Reports are for, of course, but the 2009 report was the last one completed!

From our perspective the Community Development Plans (CDPs) are included only as an afterthought in the next-to-last chapter on Implementation. We believe they should be integrated throughout the entire Plan document. The Implementation section needs to be updated as well.

Before we delve into details, several over-arching issues of great importance to residents of the County need concentrated development and support. We hope they are stressed in the next Plan.

1. **Energy Sustainability.** There have been important changes at the PUC that may have profound effects on energy generation and transmission on the Big Island. It is tragic that HELCO generates over 75% of the electrical power from imported oil. 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 for the rest of the county (and the planet), while concomitantly *reducing user costs significantly*. We have tremendous wind and solar potential and sit atop one of the most dynamic geothermal hotspots on Earth. “Free” wind and solar energy could provide significant energy, and geothermal sources could provide the necessary “dispatchable” baseline energy, adjustable to meet demand during slack periods (e.g. low winds at night). This is a *security* issue as well. Parker Ranch is presently taking a leading role in researching renewable options. The transmission grid also needs renovating and conversion to a smart grid as well. The County should set this as very high priority.
2. **Solid Waste.** The East Hawaii Landfill is substandard and at the end of its lifecycle. Green waste composes a significant proportion of waste carried to and filling our landfills while farmers clamor for more easily available mulch and compost. *The County should expand its efforts to implement robust island-wide green waste to compost/mulch facilities and community waste reduction and recycling programs.* Find a way out of the “Put-or-Pay contract at the West Hawaii 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!
3. **Water Supply.** Many Big Island areas have ageing water distribution facilities, some inherited from the old sugar plantations. Line ruptures are not uncommon in North Kohala and “spaghetti lines” (from meters to homes) can be longer than ¼ mile, crossing several properties in some cases. In addition, DWS limits their authority to residential potable water supply and not to agricultural water. Agricultural water in the Kohala Ditch has potential that exceeds present distribution capacity in North Kohala because many distribution lines were damaged in the 2006 earthquake and not replaced. The County should expand a program to upgrade the distribution infrastructure and find ways to assure that agricultural water is distributed to agricultural producers.
4. **Public Access.** 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.
5. **High-Speed Internet.** The World Wide Web and streaming services are rapidly becoming an integral part of everyday life to the people of Hawaii. Access to high-speed internet is becoming more or a basic need than a privilege and speeds of 10 mb/sec are becoming the new baseline. Yet many areas

on the Big Island are presently beyond the reach of adequate service. The County should expand its efforts to ensure that DSL cable reaches all areas.

6. **Pest Control.** 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.

DETAILED COMMENTS.

Chapter 2. Economic

p. 2-22, 2-23 North Kohala

Another important source of income and employment is tourism and its related service industries. Chalon International, Inc. (later renamed Surety Kohala) developed plans for a 240-unit resort and residential development adjacent to Mahukona Harbor. Adverse economic conditions and other impediments including foreclosure eventually led Surety to abandon the resort project. The property is presently the only property zoned Resort although development of the land is still subject to an incomplete subdivision. For the present almost all tourist activities in North Kohala are limited to daytime activities rather than accommodation. Activities that relate directly to tourism include zip-lines, ATV tours, hikes and ditch kayak rides. Many residents of this district work in tourism related jobs in the adjoining districts of South Kohala and North Kona.

From NKCDP Sec. 2.3: The district's economy has been struggling since the Kohala Sugar Company closed in 1975. Almost one-third of the workforce now commutes to South Kohala to work in the hotels and resorts located there. The search for viable businesses must continue to enable this community to remain vibrant. Many would like to see diversified agriculture encouraged in the region.

From NKCDP Sec. 2.3: The other major issue related to economics in North Kohala is property values. The median residential sales price for 2006 for Kohala was \$721,000, the highest in the County (compared to \$417,000 for the island overall). With housing prices being so high, and economic opportunities so few, there is a significant need for affordable housing in the district.

Courses of Action:

Support increased distribution and availability of Kohala Ditch water to agricultural producers.

Kohala is a rural area and should be maintained as such. Thus, development should be directed to more urban areas. (NKCDP p.13).

Increase affordable housing opportunities in North Kohala (NKCDP p. 14, Sec. 4.3).

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 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.

3. Energy

See #1 main point above for energy sustainability

p. 3-2: **North Kohala** now also has a wind farm at Upolu with sixteen 660 kW turbines capable of generating a total of 10.56 MW.

Do we still have a State Energy Coordinator? What does he or she do? HNEI too?

Improve the grid to overcome HELCO's (somewhat arbitrary) cap on % renewables on any sub-grid. Many residents in Kohala, wishing to generate their own grid-tie power, have been denied permission by HELCO on the basis that they cannot tolerate over 14% renewable on that sector due to the aging nature of the grid.

Have any of the bulleted points on p. 3-4 been implemented to completion?

Geothermal. Include new Hualalai exploration if approved. Expand BI capacity!

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.

Policies:

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.

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.

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.

4. Environmental Quality

Intro, p. 4-2: We still need baseline data for pollution conditions. Can UH Hilo help? Funding?

Volcanic gases are 99% H₂O, CO₂ and SO₂. The rest is essentially HS, CO, HCl, and HF. There is effectively no silicon, sodium, potassium, aluminum, titanium and iron. Delete these.

p. 4-3, 4-4:

Include roadside herbicide in the agricultural chemical pollutants. Also, there are some pesticide mixing sites from the sugar mills that are now toxic sites. One such site was recently discovered in Hawi with toxic levels of arsenic and dioxin in the soil. Herbicides (including Agent Orange) were used to clear sugarcane when the plantations sold out. What remains in the soil?

Is there a projected timeframe for the State's rules prohibiting installation of cesspools?

Dogs should be included in noise pollution.

Goals and Policies are awfully vague.

5. Flooding and Other Natural Hazards

p. 5-3: Any progress improving the accuracy of Flood Insurance Rate Maps?

p. 5-4: Add 2006 earthquake. Also add Hawaii studies on Sea Level Rise. Storm frequency and severity may also increase with climate change. Droughts?

p. 5-8: Puna- Restrict development in areas below and close to the SE Rift.

p. 5-13, 5-14. **North Kohala.** In Dec. 2014 a heavy rainfall event toppled trees in Niulii gulch, temporarily damming it. The dam gave way somewhat catastrophically, damaging downstream structures and Keokea Beach Park.

Keokea Beach Park is also susceptible to tsunami damage.

The grassy picnic and camping area at Mahukona Beach Park gets heavy tourist and resident use. Several times high surf has inundated the area, eroding soil and damaging tables and barbeques leaving

areas of bare dirt A seawall to protect the Mahukona picnic/camping area is desirable. Fill behind the seawall to raise and level the area is also desirable.

6. Historic Sites

p. 6-1. ~11,500 archeological and historic sites with 5% of the island surveyed. When will the remaining 95% be surveyed??

p. 6-2. How fully is PASH implemented?

p. 6-3, 6-4: How many of the Policies have been implemented/completed? Progress?

p. 6-9 **North Kohala**: Update Table 6-4 of sites?

Add to **Courses of Action** (a): NK-CDP p. 36-7 Strategy 1.7. Implement a Policy for a Cultural and Historical Preservation. The NKCDP Action Committee is working to create a subcommittee for this.

NKCDP Strategy 1.3. Down-zone identified State-owned parcels that have special cultural and/or scenic value.

7. Natural Beauty

p. 7-2, **Policies**. Add *bicycle* access to the list.

p. 7-9, 7-10 **North Kohala**. Place the more distinctive windward before leeward in intro. Develop the particularly striking nature of Pololu 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 Halaula are excellent, improve/protect them.

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

Is Table 7-9 complete?

Coordination between the County and State is needed to upgrade the viewing of the valley wilderness area from the rim of Pololu 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.

Trees? Banyans in Hawi? Monkeypod before Aamakoa?

8. Natural Resources and Shoreline

The **Policies** are excellent, but vague. Results for k, m, o, q, r, s, u w and x?

Guidelines for n, p, v, w?

Public Access needs more development: shoreline and mauka-makai. NKCDP Sec. 4.2.

Interest in improving opportunities for public access has brought about intense and continuous pressure from the community through the CDP Action Committee to not only finalize approval of already County-granted accessways which are not in place, but to strongly encourage the County to re-write portions of Chapter 34 and Planning Department Rule 21 in such a way to be more responsive to the needs of residents of all districts.

Currently **Chapter 34** does not take into consideration successions of subdivisions eg, one landowner subdivides a large tract of property to 5 lots, then a succeeding landowner subdivides again to 3 lots, circumventing the requirement for mauka-makai public access in subdivisions 6 or more lots.

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.

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.

What about District-specific needs? Viewing area at Pololu, seawall at Mahukona, etc.

NKCDP Strategy 2.1. Provide for substantive community input to the County Planning Department and the County Council in order to finalize and accept priority shoreline access easements.

9. Housing

Any results for all the **Policies** p. 9-10, 9-11?

p. 9-20, 21, 22, **North Kohala**:

p. 9-22: Under **Profile**:

Please work with the NKCDP Subcommittee on Affordable Housing to describe properly the number of affordable and self-help housing units in the district.

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.

Promote affordable housing in North Kohala? NKCDP Chapter 4.3 summarizes the need.

Promote housing for the elderly.

Support agricultural worker housing and zoning variances. NKCDP p.62-4

Encourage rental housing development in the area.

Add "Aid and encourage the development of State lands for housing for all socioeconomic levels through leasehold or purchase" (as in South Kohala)?

10. Public Facilities

p. 10-2. **Policy (e)**: Add an explanation of how the district CDPs fit in.

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.

[The Bond library no longer exists] The new North Kohala Public Library opened its doors in 2010. It was the first library in the state to earn Leed Gold certification. It has a full range of services, including books (22,000 volumes), dvd's, music, and on-line computer access.

Any thoughts on Fire and Police?

p. 10-12: **Civil Defense**

Has the County developed a database of disaster events yet?

HCCDA had implemented a Community Emergency Response Team (CERT) program with 18 teams in communities and businesses island-wide. Over 450 residents have been trained to respond to and prepare their neighborhoods for emergencies.

p. 10-14 Policies:

Expand, train, and equip Community Emergency Response Teams (CERTs).

An operating island-wide Ham radio repeater network for HCCDA emergency net. All CERT teams need to reach this to report in.

p. 10-16, North Kohala: Hisaoka Gym at Kamehameha Park is an emergency shelter. AED locations at FD, hospital and in Hawi town. NK CERT has 31 active members trained in emergency response.

p. 10-20 North Kohala Gov't Operations: Add Senior Center and Intergenerational Center?

p. 10-22. **Hospitals.** Giovana and Gino are reviewing.

p. 10-23, 10-24. **Solid Waste.** Boy is Hawaii missing their goals!

What is in the County Solid Waste Management Plan?

p. 10-24 Residential Pay-As-You-Throw User Fees are likely to contribute to illegal dumping in rural North Kohala gullies.

Policy (f) recycling is BIG. (g) green waste too. Do these! Be specific. *See #2 on p. 1 of this document.*

A compost facility should join the mulch facility at Puuanuhulu.

p. 10-28, 29 **North Kohala** (G&G reviewing Hospital)

Solid Waste. The single chute at the North Kohala transfer station at Ka'auhuhu has the largest volume of any single chute in the county. Green waste constitutes over 50% of the material going into that chute in this agricultural area and inappropriately travels to the West Hawaii Landfill at Puuanuhulu. Kohala farmers and gardeners had to travel an hour south to Puuanuhulu to get mulch, but mulch is now brought up to the County Yard at the top of Hoes Rd. North Kohala still needs a green waste chute to reduce input to the landfill and recycle it into more useful products. Ka'auhuhu Transfer Station is also used on the weekend for Hi-5 redemption and has a community-built "reuse" center staffed by an employee of Recycle Hawaii. The transfer station is outgrowing the present site and should be relocated, preferably to State-owned lands west of Hawi. The NKCDP Strategy 4.1 (p. 72-3) states, "Repair and relocate the Solid Waste Transfer Station."

E-waste disposal is available once a month and household hazardous waste is twice a year, both in Waimea. Get a hazardous waste drop-off in North Kohala. Residents must drive to Waimea with used batteries etc. if they want to dispose of hazardous material properly. Most simply throw it away at Ka'auhuhu.

11. Public Utilities

11-1 **Goals** should include lower electric rates and energy independence based on renewables. *See #1 on p. 1 of this document.*

p. 11-4. **Water. Policies** are great, particularly (c) Improve and replace inadequate systems and (j&o) improve and expand agricultural water. Do these!

p. 11-8. **North Kohala Water. Profile.**

The North Kohala District obtains water from three wells. Hawi wells No. 1 and 2 serve most of the area with an average consumption of 0.31 mgd. A smaller well at Makapala produces an average of

0.04 mgd. DWS is negotiating to add a well at Halaula and is encouraged to add another to the west of Hawi (the Kealahewa well). All of these wells should be interconnected to provide redundancy in Kohala should any single pump fail.

The Kohala Ditch taps the supply-rich Waimanu and eastern Hawi sector areas and delivers water to the user-intensive central and western Hawi area (and some of the Mahukona area). Many agricultural concerns in North Kohala were severely impacted by the disruption of the Kohala Ditch in 2006. The ditch was repaired (at considerable effort and expense), but only part of the earlier distribution system was restored, leaving many of the previous agricultural water users cut off. The ditch is at a high elevation above most of the Kohala population, capable of providing non-potable water at significant head (pressure). Some of the mauka-makai distribution pipes are still intact. Others only need creative sources of funding to relieve DWS of expensive pumping costs for water that does not need to meet safe drinking standards.

Reopening some of the Kohala 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. It would also save DWS considerably in pumping costs. Such a project is recommended in both the WUDP and NKCDP.

p. 11-13. Telecommunications Policies.

Support HCCDA to implement an Emergency Ham radio repeater system that reaches the entire island.

Set standards so get high-speed (10 mb/s) internet available to all homes. *See #5 on p. 1 of this document.*

p. 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.

Policies: *See #1 on p. 1 of this paper for need to lower rates, convert to renewables, and upgrade to a smart grid.*

p. 11-18. Sewer Policies. Phase out new cesspool permits.

12. Recreation

p. 12-2: is there a new County of Hawaii Recreation Plan? I see nothing on the web.

Public Access is big in this section and should be stressed/encouraged

p. 12-14, 12-15. North Kohala:

Community park proposed for Kahei area? I've never heard of this.

Profile: Since 1993 the County has relied on conditions to the resort permits at Mahukona to provide funds for the upgrading of Mahukona 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.

Kamehameha Park:

- Scoreboard replaced/but too small for main field, will move to Veterans field when multipurpose scoreboard arrives—on order
- Bleacher machine still on order, No date yet.
- Hisaoka gym roof replacement is in progress—tbc 4/30
- Gateball concession and storage plans ready, need to start—after stage cover
- Stage cover plans ready, need to start—tbc 6/30

Ad a brief section on Adopt-a-Park program. Have groups for all County parks in N Kohala.

Courses of Action:

Kapa'a: include power, water, and new pavilion restrooms?

Mahukona: update without Chalon. Pavilion/restrooms, potable water? What about a breakwater and grading to level behind it?

The county has just acquired a 1 acre parcel near the banyan trees in downtown Hawi. Encourage the construction of a public restroom and a parking area in this area by the county.

Improve parking and lookout facilities at Pololu.

13. Transportation.

p. 13-2 and 13-5 **Policies.** Bicycle pathways are highly subordinate. Make a special policy for them.

p. 13-4. Homestead roads is an interesting section. Will someone explain its ramifications for 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 Hawi and Kapaau. Maybe linking the schools too?

The Akoni Pule Highway is the only open road linking all of North Kohala following the coast. 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).

Action on (c)!

p. 13-20. North Kohala Harbors: do we want to list the Boat Ramp issue? NKCDP Strategy 4.2 p. 73

14. Land Use

Agriculture: p. 14-16: "Agricultural land values have risen beyond their value for agricultural purposes." (!!)

Policies: All are great.

Notice (q) Farm labor housing projects shall be developed in a manner that minimizes the use of important agricultural lands and is consistent with the character of surrounding land uses.

Add a line to encourage a BI slaughterhouse and packing facility?

p. 14-20, 21. **North Kohala**

Profile North Kohala has substantial rainfall toward the eastern end and some of the oldest soils on the island. It has a rich agricultural heritage dating back hundreds of years. Ranching, macadamia nut, lychee and nursery production are principal activities and there are increasing numbers of vegetable farms that are adding to the economy.

There are 67,977 acres of agriculturally zoned lands in the district. Over 14,000 acres within this district were previously serviced by agricultural infrastructure. This includes the Kohala Ditch irrigation system, that remains viable and could provide opportunities to more intensively utilize these lands for agricultural purposes.

The agricultural lands of North Kohala also create much of the feeling of open space that is so important to the area. A number of legislative resolutions have supported the protection of viewplanes and open space from the main highway to the sea, most recently Senate Concurrent Resolution No. 146.

14.2.4.4.2 Courses of Action

- (a) Encourage the maintenance and more intensive utilization of the Kohala Ditch irrigation system for agricultural production.
- (b) Support the development of private and State agricultural parks as a means of making agricultural land available for commercial agricultural activities.
- (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.

Maybe remove line (c) on viewplanes? Why is that under Ag?

- (d) Limit rezoning of Agricultural lands to development. NKCDP p. 14, 19
- (e) Concentrate development in mostly urban areas. NKCDP p. 13, 16, 26
- (f) 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 Strategy 1.8 also stresses Important Agricultural Lands

Commercial Development

p. 14-29. North Kohala

I'm not sure what to do/say about Courses of Action (a) and (b). Anything else?

Industrial

p. 14-39. North Kohala

Nothing to suggest.

Multiple Residential

p. 14-44. North Kohala

Encourage programs of affordable housing and the development of more rental housing in North Kohala. See NKCDP Chapter 4 for a summary.

Single-Family Residential

p. 14-46 Ohana stuff is out-of-date.

p. 14-50. **North Kohala**

Concentrate development in mostly urban areas. NKCDP p. 13, 16, 26

Encourage programs of affordable housing. See NKCDP Chapter 4 for a summary.

What does “Many of the undeveloped residential zoned areas are unsuitable for residential development because of unfavorable topographic conditions” mean?

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)?

p. 14-54 **Policies** (d)- add CDPs.

p. 14-59. **North Kohala**

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 Mahukona. 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 Kapaau coast.

Open Space

p. 14-63. Policy (d): Has this been done?

NKCDP Strategy 1.2. Acquire coastal lands that should be preserved as open space

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

Public Lands

p. 14-64 paragraph 1. The numbers don't add up. I think State lands should be 44%, not 34.

p. 14-65 **Policies** (b)- add CDPs.

15. Implementation

Is it still necessary to outline the *creation* of individual CDPs? Aren't they already in progress?

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.

The Community Development Plans shall identify appropriate governmental actions that include: