

Domian, Jesse

2017 APR 24 PM 3 05

From: Morikawa, Lydia M <lydia.m.morikawa@hawaii.gov>
Sent: Monday, April 24, 2017 1:55 PM
To: Planning Internet Mail
Subject: Review of the Hamakua Community Development Plan (CDP)
Attachments: Hamakua Community Development Plan 04.24.17.pdf

PLANNING DEPARTMENT
COUNTY OF HAWAII

Aloha Mr. Yee,

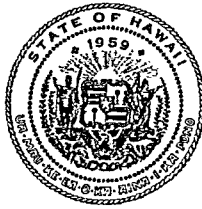
Attached for your review are additional comments for the subject project.

Mahalo,

*Lydia M. Morikawa
DLNR – Land Division
1151 Punchbowl Street; Rm. 220
Honolulu, Hawaii 96813
Phone: (808) 587-0410
Fax: (808) 312-6357*

111198

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

April 24, 2017

County of Hawaii
Planning Department
Attention: Mr. Michael Yee, Director
101 Pauahi Street, Suite 3
Hilo, Hawaii 96720

via email: planning@hawaiiicounty.gov

Dear Mr. Yee:

SUBJECT: Review of the Hamakua Community Development Plan (CDP)

Thank you for the opportunity to review and comment on the subject matter. In addition to the comments previously sent you on April 20, 2017, enclosed are comments from the (a) Engineering Division and (b) Division of Forestry & Wildlife (2) on the subject matter. Should you have any questions, please feel free to call Lydia Morikawa at 587-0410. Thank you.

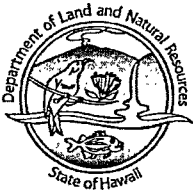
Sincerely,

A handwritten signature in black ink, appearing to be "Russell Y. Tsuji".

Russell Y. Tsuji
Land Administrator

Enclosure(s)
cc: Central Files

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

March 30, 2017

MEMORANDUM

TO:

DLNR Agencies:

- ☒ Div. of Aquatic Resources
☐ Div. of Boating & Ocean Recreation
Flow: ☒ Engineering Division
☒ Div. of Forestry & Wildlife
☐ Div. of State Parks
☒ Commission on Water Resource Management
☒ Office of Conservation & Coastal Lands
☒ Land Division – Hawaii District
☒ Historic Preservation

FROM: *Lo.*

SUBJECT:

LOCATION:

APPLICANT:

Russell Y. Tsuji
Russell Y. Tsuji, Land Administrator
Review of the Hamakua Community Development Plan (CDP)
Hamakua, N. Hilo & Parts of S. Hilo; Island of Hawaii; TMK: (3) various
County of Hawaii, Hamakua Community Development Plan

Transmitted for your review and comment is information on the above-referenced project. We would appreciate your comments on this project. Please submit any comments by April 19, 2017.

The CDP can be found on-line at: <http://www.hawaii-countycdp.info/hamakua-cdp/recommended-cdp-january-2017>

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

Attachments

- () We have no objections.
() We have no comments.
(X) Comments are attached.

Signed:

Print Name: *Gary S. Chang*
Date: *4/1/17*

cc: Central Files

DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

2017 APR 10 AM 11:02

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LAND DIVISION

**DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION**

LD/Russell Y. Tsuji

Ref: Review of the Hamakua Community Development Plan (CDP)

COMMENTS

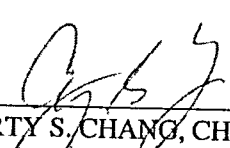
The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a designated Flood Hazard.

The owner of the project property and/or their representative is responsible to research the Flood Hazard Zone designation for the project. Flood Hazard Zone designations can be found using the Flood Insurance Rate Map (FIRM), which can be accessed through the Flood Hazard Assessment Tool (FHAT) (<http://gis.hawaiiinfip.org/FHAT>).

Be advised that 44CFR reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may take precedence over the NFIP standards as local designations prove to be more restrictive. If there are questions regarding the local flood ordinances, please contact the applicable County NFIP Coordinators below:

- Oahu: City and County of Honolulu, Department of Planning and Permitting (808) 768-8098.
- Hawaii Island: County of Hawaii, Department of Public Works (808) 961-8327.
- Maui/Molokai/Lanai County of Maui, Department of Planning (808) 270-7253.
- Kauai: County of Kauai, Department of Public Works (808) 241-4846.

Signed: _____


CARTY S. CHANG, CHIEF ENGINEER

Date: _____


4/14/17

Morikawa, Lydia M

From: MyersTremblay, Dietra
Sent: Friday, April 21, 2017 10:37 AM
To: Morikawa, Lydia M
Cc: Sprecher, Irene M; Hauff, Robert D; Cogswell, James M
Subject: DOFAW (Wildfire) Comments on the Hamakua Community Development Plan

Hi Lydia,

Per our discussion today, you will submit my comments below through Land Division. Irene Sprecher is also planning on submitting comments. She may either submit comments to you or submit them directly to Hawaii County. Thank you for comments below.

Pursuant to the Land Fire Protection Law, Chapter 185, Hawaii Revised Statutes, the Department of Land and Natural Resources is mandated to take measures for the prevention, control and extinguishment of wildland fires on Division of Forestry and Wildlife (DOFAW) managed lands and is also required to cooperate with established fire control agencies of the counties and the federal government in developing plans and programs and mutual aid agreements for assistance for the prevention, control, and extinguishment of wildland fires on lands not managed by DOFAW.

The Hamakua Planning Area includes several Communities at Risk (CAR) from Wildfires (see CAR map: <http://www.hawaiiwildfire.org/fire-resource-library-blog/communities-at-risk-state-map>), including at least one CAR that is High Risk. Additionally, wildfire hazard assessments for this area ranks some communities in this area as High or Extreme Hazard dependent on the rating element used (see community hazard assessments for County of Hawaii - North: <https://static1.squarespace.com/static/5254fbc2e4b04bb53b57821/t/54ff73dee4b07ef14e0103c8/1426027486997/County+of+Hawaii+%28North%29+Community+Hazard+Assessment+Maps.compressed.pdf>).

Although this plan mentions that natural disasters, include wildfires are a consistent threat, it fails to specify wildfire risk reduction approaches such as:

- 1) Voluntary or nonregulatory mitigation measures and tools, including establishing Community Wildfire Protection Plans (CWPPs) for this area and working towards gaining Firewise recognition for communities in this area. In order for communities to be eligible for funds available through the Wildland Urban Interface (WUI) Grant Program, the area must have an approved CWPP. U.S. Forest Service funds to reduce communities' risk from wildland fire within the WUI are available through the WUI Grant Program and are awarded annually through a competitive process with emphasis on: 1) Hazardous fuel reduction in the WUI; 2) Information and education; and 3) Planning.
- 2) Involuntary or regulatory mitigation measures, including land use laws, subdivision design regulations, home ignition zone ordinances, and WUI Fire codes. These planning and regulatory tools can be used to provide better wildfire protection for new residential development.

Land use planners and policymakers as well as community members who determine where and how growth occurs play an important role in safeguarding Hawaii's emerging communities from wildfires. Although this plan addresses land use and community infrastructure goals by concentrating future developments in the existing towns, villages, and subdivisions, it fails to specify that reducing urban sprawl can curb future growth from occurring in areas that are at higher-risk of wildfires. Risk reduction for new communities can be achieved by forming a wildfire planning policy that aligns land use and planning decisions with safe growth. However, the State of Hawaii does not have a wildfire planning

policy that addresses growth management in respect to wildfire risk. This is an opportunity for Hamakua to use land use and settlement patterns as a wildfire risk reduction approach and advocate for safe growth.

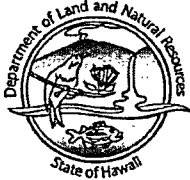
This plan addresses the protection of watersheds, native wildlife, and natural ecosystems. Wildfires in Hawaii are a threat to these types of natural resources Mauka to Makai. Over 98% of wildfires in Hawaii are human-caused. Furthermore, the percentage of land area burned annually in Hawaii exceeds the national average, and some years surpasses the 12 most fire-prone western states. Human-caused wildfires that occur in the WUI, especially in residential areas near native ecosystems and forested watersheds, concern natural resource managers. Human-caused wildfires that started near communities, but then spread toward and burned valuable conservation areas have occurred in Hawaii. This plan does not specify actions at the county level that would ensure development uses, including land use and settlement patterns, are compatible with reducing wildfire risk to Hamakua's conservation areas, including watersheds, native wildlife, and natural ecosystems.

Lastly, in regards to Kokua Action 42 under 3.11 Land and Natural Resources in the Guidance to Agencies document, DOFAW is involved with several wildfire risk reduction efforts in collaboration with partners. This Kokua Action only addresses response. However, minimizing impacts to cultural and natural resources can also be achieved by implementing risk reduction programs, including prevention and mitigation measures.

Dietra A. Myers Tremblay
Acting Fire Protection Forester
State of Hawaii
Department of Land and Natural Resources
Division of Forestry and Wildlife
1151 Punchbowl St. Rm 325
Honolulu, HI 96813

Phone (808) 587-4186
Cell (808) 347-6740
Fax (808) 587-0160

DAVID Y. IGE
GOVERNOR OF
HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF FORESTRY AND WILDLIFE

1151 PUNCHBOWL STREET, ROOM 325
HONOLULU, HAWAII 96813

April 21, 2017

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

SUBJECT: Comments for the Hāmākua Community Development Plan (CDP)

Thank you for the opportunity to provide comments on the Hāmākua Community Development Plan (CDP). The Division of Forestry and Wildlife has the following comments for your consideration and incorporation as appropriate.

The U.S. Forest Service's Institute for Pacific Island Forestry, in partnership with the Division of Forestry and Wildlife (DOFAW), has an established research forest within the Hāmākua community. The Hawaii Experimental Tropical Forest (<http://www.hetf.us/page/home/>) was established in 2007 and includes portions of the Hilo Forest Reserve and Laupāhoehoe Natural Area Reserve. The management of this forest supports research from a variety of educational institutes and agencies all focused on understanding Hawaii's tropical forests. The Division recommends the inclusion of this significant resource into the CDP and the development of corresponding policy and/or kōkua actions.

Pursuant to the Land Fire Protection Law, Chapter 185, Hawaii Revised Statutes, the Department of Land and Natural Resources is mandated to take measures for the prevention, control and extinguishment of wildland fires on Division of Forestry and Wildlife (DOFAW) managed lands and is also required to cooperate with established fire control agencies of the counties and the federal government in developing plans and programs and mutual aid agreements for assistance for the prevention, control, and extinguishment of wildland fires on lands not managed by DOFAW.

The Hamakua Planning Area includes several Communities at Risk (CAR) from Wildfires (see CAR map: <http://www.hawaiiwildfire.org/fire-resource-library-blog/communities-at-risk-state-map>), including at least one CAR that is High Risk. Additionally, wildfire hazard assessments for this area ranks some communities in this area as High or Extreme Hazard dependent on the rating element used (see community hazard assessments for County of Hawaii - North: <https://static1.squarespace.com/static/5254fbc2e4b04bbc53b57821/t/54ff73dee4b07ef14e0103c8/1426027486997/County+of+Hawaii+%28North%29+Community+Hazard+Assessment+Maps.compressed.pdf>).

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

KEKOA KALUHIWA
FIRST DEPUTY

JEFFREY T. PEARSON, P.E.
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING

FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

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DLNR DOFAW
Hāmākua Community Development Plan

Although this plan mentions that natural disasters, include wildfires are a consistent threat, it fails to specify wildfire risk reduction approaches such as:

- 1) Voluntary or non-regulatory mitigation measures and tools, including establishing Community Wildfire Protection Plans (CWPPs) for this area and working towards gaining Firewise recognition for communities in this area. In order for communities to be eligible for funds available through the Wildland Urban Interface (WUI) Grant Program, the area must have an approved CWPP. U.S. Forest Service funds to reduce communities' risk from wildland fire within the WUI are available through the WUI Grant Program and are awarded annually through a competitive process with emphasis on: 1) Hazardous fuel reduction in the WUI; 2) Information and education; and 3) Planning.
- 2) Involuntary or regulatory mitigation measures, including land use laws, subdivision design regulations, home ignition zone ordinances, and WUI Fire codes. These planning and regulatory tools can be used to provide better wildfire protection for new residential development.

Land use planners and policymakers as well as community members who determine where and how growth occurs play an important role in safeguarding Hawaii's emerging communities from wildfires. Although this plan addresses land use and community infrastructure goals by concentrating future developments in the existing towns, villages, and subdivisions, it fails to specify that reducing urban sprawl can curb future growth from occurring in areas that are at higher-risk of wildfires. Risk reduction for new communities can be achieved by forming a wildfire planning policy that aligns land use and planning decisions with safe growth. However, the State of Hawaii does not have a wildfire planning policy that addresses growth management in respect to wildfire risk. This is an opportunity for Hamakua to use land use and settlement patterns as a wildfire risk reduction approach and advocate for safe growth.

This plan also addresses the protection of watersheds, native wildlife, and natural ecosystems. Wildfires in Hawaii are a threat to these types of natural resources Mauka to Makai. Over 98% of wildfires in Hawaii are human-caused. Furthermore, the percentage of land area burned annually in Hawaii exceeds the national average, and some years surpasses the 12 most fire-prone western states. Human-caused wildfires that occur in the WUI, especially in residential areas near native ecosystems and forested watersheds, concern natural resource managers. Human-caused wildfires that started near communities, but then spread toward and burned valuable conservation areas have occurred in Hawaii. This plan does not specify actions at the county level that would ensure development uses, including land use and settlement patterns, are compatible with reducing wildfire risk to Hamakua's conservation areas, including watersheds, native wildlife, and natural ecosystems.

Comments generated from the Agency Guide of the CDP:

Policy 43: We respectfully request the inclusion of DOFAW as part of the watershed management goals and planning for collaboration. The Division is a major partner with the Mauna Kea Watershed Alliance, and manages significant forested watershed lands within the Hāmākua District that would benefit from additional collaboration with the county and community.

DLNR DOFAW
Hāmākua Community Development Plan

Policy 44: DOFAW strongly supports the encouragement of native and noninvasive planting alternatives for landscaping and restoration projects; however, we recommend utilizing the Hawaii-Pacific Weed Risk Assessment (HPWRA) available through Plant Pono (<http://plantpono.org/>) instead of Hawaii Administrative Rule 4-68. The HPWRA and Plant Pono was developed in partnership with DOFAW, Coordinating Group of Alien Pest Species, University of Hawaii, and the Urban and Community Forestry Council to quickly identify plants that are invasive or have a high likelihood of becoming invasive. The website is a more comprehensive list of invasive plants as well as provides numerous plant alternatives.

Policy 49: DOFAW recommends expanding this policy to require persons requesting subdivision of their lands to provide vehicular and/or pedestrian public access easements to forest reserves, natural areas, shoreline, historic sites, and other public resources. The county's support with identification of paper and homestead roads that can provide this access, as well as the development of access routes, through acquisition as necessary, would assist with meeting the County's, community's, and Division's access priorities.

Policy 56: DOFAW recommends that a feasibility study include access to the Hāmākua Forest Reserve (Kea'a and Hanapai sections) along the scenic route.

Policy 60: Waimanu Valley camping, Muliwai Trail and Kohala Forest Reserve information should be integrated with the support facilities for Waipio Lookout and the Heritage Corridor route.

Policy 74: The planning and implementation of a Complete Streets Program would benefit from additional consideration for supporting green infrastructure that can enhance roadway, sidewalk, and bike path designs. Trees are an important component to a complete street, enhancing people's enjoyment of the area as well providing numerous economic and ecological benefits. Often times, the green infrastructure components are not included in the initial planning phase and design plans, which results in less than ideal conditions for growing and maintaining trees. Sufficient planting and growing spaces should be factored into early designs, as well as the utilization of native or non-invasive trees and plants.

Policy 92: Waimanu Valley hikers and campers should be included in evacuation planning for this area. Further, the Division recommends seeking consultation and collaboration with the County Arborist Committee, or local arborists, to identify management needs for priority emergency routes, develop response plans for tree maintenance following disaster events, and support of educational material for residents on tree care that will improve their resiliency (also in support of **Kōkua Action 42**).

Policy 103: DOFAW recommends the incorporation of a recreation priority for the location, possibly including development and management of a firearm or archery target range.

Kōkua Action 19: The U.S. Forest Service should be included in the list of federal agencies that need sufficient funding to implement critical programs, in particular with their work at the

DLNR DOFAW
Hāmākua Community Development Plan

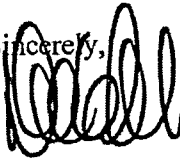
Laupāhoehoe section of the Hawaii Experimental Tropical Forest and support of Rapid 'Ōhi'a Death research.

Kōkua Action 31: The Bureau of Land and Natural Resources should be changed to the State of Hawaii Department of Land and Natural Resources within the table of contents and moved under the State Agencies section.

Kōkua Action 34: DOFAW recommends revising this action to the following: "Review possible inclusion of mamane-naio forest site from Mauna Kea Forest Reserve into the Natural Area Reserve System, including benefits to the natural resources as well as any impacts to community use and access to the area.

Kōkua Action 42: DOFAW is involved with several wildfire risk reduction efforts in collaboration with partners. This Kōkua Action only addresses response; however, minimizing impacts to cultural and natural resources can also be achieved by implementing risk reduction programs, including prevention and mitigation measures.

Thank you again for the opportunity to provide comments on the Hāmākua Community Development Plan. Should you require additional information from DOFAW, please contact Irene Sprecher at (808) 587-4167 or by email at irene.m.sprecher@hawaii.gov. Mahalo

Sincerely,


DAVID G. SMITH
Administrator