

OFFICE OF PLANNING STATE OF HAWAII

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Ref. No. P-15563

April 10, 2017

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

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

Dear Mr. Yee:

Thank you for the opportunity to provide comments on the Hamakua Community Development Plan (CDP). The request for comments was transmitted to our office by letter dated March 15, 2017.

The County's CDP program creates a framework for regional planning that provides residents and other stakeholders the opportunity to actively participate in planning for their communities. The Hamakua CDP planning area includes the Judicial Districts of Hamakua and North Hilo, and parts of South Hilo, with the southern planning area edge bordering Kaiwiki and Hau Street. The planning area includes the towns of Kukuihaele, Honokaa, Paauilo, Ookala, Laupahoepahoe, Papaaloa, Ninole, Hakalaui/Wailea, Honomu, Pepekeo, Papaikou, and Paukaa, and all of the agricultural and conservation lands in between.

In 2016, the Steering Committee for the Hamakua CDP formally recommended the Hamakua CDP for adoption. Following agency review, the CDP will go to the Windward Planning Commission for review and recommendations. The County Council will then consider the CDP for adoption by ordinance.

The Office of Planning (OP) offers the following comments on the Hamakua CDP.

1. **Priority guidelines on Climate Change Adaptation.** HRS § 226-109 addresses climate change adaptation priority guidelines. HRS § 226-109 should be acknowledged, integrated and referenced in the policies developed in Section 4, Protect and Enhance Natural and Cultural Resources, and in Section , Strengthen Infrastructure, Facilities, and Services. Specifically, HRS § 226-109 should be referenced in Section 4.2.3, Land Use Policy, Policy 18, on page 53 with reference to an "assessment of impacts on hazard risk including flooding, tsunamis, and coastal erosion and/or sea level rise over the life of the

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development.” Priority guidelines to prepare the State to address the impacts of climate change, including impacts to the areas of agriculture; conservation lands; coastal and nearshore marine areas; natural and cultural resources; education; energy; higher education; health; historic preservation; water resources; the built environment, such as housing, recreation, transportation; and the economy should be included in the Hamakua CDP.

2. **Priority Guidelines on Sustainability.** The CDP does not expressly acknowledge HRS § 226-108, Priority Guidelines on Sustainability. The Priority Guidelines should be referenced as they are currently embedded throughout Sections 3,4,5 and 6 of the Hamakua CDP. With regard to addressing priority guidelines on sustainability, the CDP should also consider including policies that encourage the use of green building rating systems (such as LEED, the Living Building Challenge, Green Globes, Energy Star) or sustainable neighborhood rating systems for new neighborhood development, including but not limited to nationally recognized rating systems such as Leadership in Energy and Environmental Design for Neighborhood Development (LEED-ND), Ecodistricts, Green Enterprise Communities or another comparable State-approved, nationally recognized, and consensus-based guideline, standard, or system.
3. **Priority Guidelines on Affordable Housing.** HRS § 226-19 discusses State objectives and policies for socio-cultural advancement with respect to housing. HRS § 226-106 also addresses priority guidelines for the provision of affordable housing. To ensure alignment with State priority guidelines on affordable housing, Section 5.2, Expanding Affordable Housing Options, Policy 64, on page 76 should incorporate relevant State guidelines and reference both HRS § 226-19 and HRS § 226-106.
4. **Transit-Oriented Development (TOD).** Under HRS § 226-63 (c)(1) OP is responsible for coordinating with the counties on strategic planning for TOD. The Hamakua CDP should address how it supports TOD or Transit-Ready Development (TRD), including policies that encourage mixed-use development and walkable density within one-half mile of transit stops. TOD or TRD zones should be identified on the HCDP Land Use Guide Maps on pages 39 to 49, or in a separate map series illustrating proposed TOD or TRD areas. OP encourages the development of mixed-use projects for new and infill development located in transit corridors in the State Urban District.

5. **Complete Streets.** Section 5.3 of the Hamakua CDP (pages 73 to 80) should reference the relevant State and County Complete Streets policies, pursuant to Act 54, Session Laws of Hawaii 2009 and HRS § 264-20.5. The CDP should elaborate on the policies related to Complete Streets, including the key State Complete Streets principles: safety, Context Sensitive Solutions (CSS), accessibility and mobility for all, use and comfort of all users, consistency of design guidelines and standards, energy efficiency, health, and green infrastructure.
6. **Coastal Zone Management (CZM).** Coastal Zone Management and Special Management Areas (SMA) are addressed in Chapter 205A, HRS, the CZM Act.
 - a. Section 3.1.4, Land Use Policy, Policy 2, on page 35 of the Hamakua CDP states that new urban development shall be located away from coastal areas and the Special Management Area (SMA). The Hamakua CDP should define the term “coastal area.” The coastal area can be much larger in size than the SMA, and may encompass offshore and land area. The Hamakua CDP should also provide a rationale on locating urban development away from the SMA, and list the expected advantages that may ensue from this new policy. Section 4.2.4, County Action, Policy 22, page 54-55 considers amending SMA rules to protect coastal resources. On page 55, the analysis recommends SMA boundary amendments to further protect known resources. The Hamakua CDP should provide site specific justifications for SMA boundary amendments.
 - b. Section 4.2.3, Land Use Policy, Policy 18, on page 53, seeks to limit coastal development to achieve Coastal Zone Management and CDP objectives and policies. The use of the term “limit coastal development” is vague and too broad. We recommend a more refined definition of this term that could include the following: “Place special controls on development within an area along the shoreline.”
 - c. Section 4.2.3, Land Use Policy, Policy 18, page 53 contains an incorrect citation. The Policy states that “An assessment of impacts on coastal scenic and open space resources and view planes, including those outlined in the General Plan, the Community Development Plan, and other adopted plans, as well as the line of sight toward the sea from the state highway nearest the coast and along the shoreline. HRS § 205A -26(3)(E) should be

Mr. Michael Yee, Director
Planning Department
County of Hawaii
April 10, 2017
Page 4

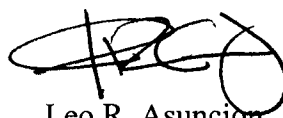
listed as HRS § 205A -26(3)(D).

7. CZM, Objectives and Policies. CZM Objectives and Policies for Coastal Zone Management are defined in HRS § 205A-2.

- a. HRS § 205A-2(2) discusses the protection, preservation, and, where desirable, restoration of those natural and manmade historic and prehistoric resources in the coastal zone management area that are significant in Hawaiian and American history and culture. Section 3.1.3, Existing Policy, Preservation of Natural/Cultural Resources, on page 34 should reference HRS § 205A-2(2).
- b. HRS § 205A-2(3) addresses Scenic and Open Space Resources, by protecting, preserving, and, where desirable, restoring or improving the quality of coastal scenic and open space resources. Section 3.1.5, County Action, Policy 14, on page 38 promotes open space buffers. HRS § 205A-2(3) should be referenced in this policy. Section 4.5, Preserve Scenic Areas and Viewsheds, on pages 59-62 is also consistent with HRS § 205A-2(3), and the statute should be referenced as well.
- c. HRS § 205A-2(4) addresses the protection valuable coastal ecosystems, including reefs, from disruption and minimizing adverse impacts on all coastal ecosystems. Section 4.6, Protect and Enhance ecosystems and Watershed, on pages 62-64, is also consistent with HRS § 205A-2(4) and should also be referenced.

Thank you for providing us with the opportunity to comment. Should you have any questions, please call Nicola Szibbo of our Land Use Division at (808)587-2883 or Josh Hekeia of our CZM program at (808)587-2845.

Sincerely,

A handwritten signature in black ink, appearing to read 'Leo R. Asuncion', written over a horizontal line.

Leo R. Asuncion
Director