



March 29, 2024

Aloha, County of Hawaii Planning Department,

We are HULI PAC, a group of volunteer, grassroots community advocates living and working on Hawaii Island. We work with backyard community-based advisors in each moku of our island to uplift knowledge from our community and deliver community-directed mana'o to sitting representatives and leaders. Our values encompass a holistic approach to life, emphasizing harmony, respect, and interconnectedness and include Aloha, 'Ohana, Kuleana, Mālama 'Āina, Pono, Ho'oponopono and Mana. These values form the foundation of Hawaiian culture, guiding individuals and communities in their daily lives. They serve as a reminder to honor the past, preserve the land, and nurture relationships with others, fostering a sense of harmony and well-being.

HULI PAC is taking the time to provide comments regarding the County of Hawaii General Plan 2045 and its process because we have major concerns about the Planning Department's compliance with the process and purpose of the General Plan, as well as with significant components, including implementation, monitoring and evaluation, and a lack of specific long range strategies consistent with the seven adopted Community Development Plans and any existing Agency Functional Plans. ***This Draft General Plan 2045 lacks legal and ethical integrity, and should not see the light of day. We expect, need and demand better.***

Mayor Mitch Roth has stated that "The General Plan gives our community the opportunity to navigate the future of our island home in a way that it is sustainable and truly in the best interest of us all." Yet, we find it dangerous when, throughout the document, there is no clarification or specification of the words "stakeholder" (mentioned 47 times), "government" (mentioned 24 times), and "private and non-profit agencies" (mentioned 20 times). Furthermore, there is strikingly not a single reference to homeowners, the general populace or property owners. *No partnership is mentioned with residents and property owners. Not once.*

HULI PAC holds major concerns that the changes made to the 2005 General Plan are very difficult to identify due the 2045 GP draft being a full rewrite and thus the community has had a very difficult time navigating through the process which is designed to be transparent and comparative, presumably to minimize public concerns. Yet during this process, the lack of community scoping and marginalized approach to the County's community outreach felt disingenuous and even sneaky in the poster board presentations, and lack of a cohesive and detailed presentation in an organized group setting in order for us to understand the changes made against the 2005 General Plan and the 2019 General Plan amendments. The inability to

list and observe community concerns as a collective adds to the lack of transparency, and meetings weren't even recorded for future viewing and understanding for residents that couldn't attend them in person. That alone created a super exclusive forum, far from creating inclusivity on such a large island and further marginalized our minority community. Even more glaringly, the design and manner of the Planning Department's community outreach was culturally inappropriate and uncomfortable for many Kakaka Maoli and other multigenerational kama'aina residents who are already disenfranchised and marginalized. Auwe, in contrast to the Mayor's statement, the community did not have the "opportunity to navigate the future of our island home in a way that is sustainable and truly in the best interest of us all." In addition, we question whether the Planning Department has collaborated directly with our CDP working groups; in the last public meeting in 2023, every CDP group articulated the lack of respect and collaboration and their many years of community-directed input went unheard.

HULI PAC has broken down concerns into six major issues.

Issue 1: Noncompliance with 2005 GP Review Process

The largest issue with the Draft General Plan 2045 is that the Planning Director IS NOT COMPLIANT with the review process mandated in the 2005 General Plan ([p6](#)). The Draft General Plan 2045 does NOT contain the set of recommended amendments. It is a complete rewrite. Amendments that are linked to the previously adopted General Plan help the community and other reviewers understand the context and need to justify each amendment, and timestamp each change to be clear about what was adopted when.

The Planning Director shall initiate a comprehensive review of the General Plan **and prepare a set of recommended amendments**

- Planning Director shall initiate a comprehensive review **not more than 10 years** after the date of adoption of the previous amendments resulting from a comprehensive review. -
- ... and shall be submitted to Council **not more than 13 years** after the date of adoption of the previous amendments.
- The Planning Director shall establish a deadline for **Council-initiated amendments** during the comprehensive review which **shall be not less than 120 days** after the initial notice under section 16.1(2).

Issue 2: Noncompliance with State's GP Purpose and Expectation

The second largest issue is that The Planning Director HAS NOT COMPLIED with the State's stated purpose and expectation of what shall be included in the General Plan.

Pursuant to HRS [226-52](#) and [226-58](#) ([see reference below](#)) - the County GP includes overall themes, goals, principals, objectives and policies, **as well as implementation priorities and actions** to carry out policies - including **land use maps, regulatory measures, standards, programs, projects and interagency coordination**. [*Neither clearly define all these terms*].

- (4) County general plans that shall **indicate desired population and physical development patterns** for each county and regions within each county. In addition, county general plans or development plans **shall address the unique problems and needs** of each county and regions within each county. County general plans or development plans **shall further define** the overall theme, goals, objectives, policies,

and **priority guidelines** contained within this chapter. State functional plans shall be taken into consideration in amending the county general plans;

The Draft General Plan 2045 is poorly organized and missing needed information; the Planning Department should have clearly shown what progress has been made over the last 18 years, and link specific needs, including new State regulations, to the new amendments.

Issue 3: Noncompliance with County GP Purpose

The third largest issue is The Planning Director has NOT COMPLIED with the County's stated purpose of the General Plan.

- Pursuant to Charter section 3-15 ([see reference below](#)) ...**shall be consistent with proper** conservation of natural resources and the 6 preservation of our natural beauty and historical sites; the most desirable density of population in the several parts of the county; a system of principal thoroughfares, highways, streets, public access to the shorelines, and other open spaces; the general locations, relocations and improvement of public buildings, the general location and extent of public utilities and terminals, whether publicly or privately owned, for water, sewers, light, power, transit, and other purposes; the extent and location of public housing projects; adequate drainage facilities...

No detailed maps were included that referenced the locations or relocations of public infrastructure or buildings. Many of us expect the General Plan to contain a huge body of fairly explicit information (e.g. how many people live in each shaded polygon on the maps and how many subdivided house lots or development project units have been approved in each area, and what is each utility's and social service's current and projected capacity to serve each area. Where must growth be limited until the infrastructure can be upgraded to safely support the added demand). Without this, the General Plan is not usable, other than providing aspirational value statements (which are not helpful when prioritizing and budgeting CIP projects.)

Issue 4: Does Not Achieve 20 Years Minimum Adequacy

The plan does not achieve minimum adequacy to serve for 20 years.

- Proposes extending the planning horizon by 5 years (initiate the next comprehensive GP review in 15 and submit to Council by 20).

We are concerned that this Draft is a complete rewrite and doesn't clearly identify what content comes forward from the 2005 and 2019 and what are new amendments (with clear rationale on the need or problem they address). We are concerned that it is not actionable. It delegates and relies on additional detailed Plans (listed below). However, most of these are out-of-date and the Planning Department has said it will take considerable time to review and update them (years to decades). *This leaves us without a roadmap of what the County intends to do specifically in each small geographic area (e.g. Small Town Center, Rural Village, Sea Level Rise Exposure Area, Transit Corridor, Commercial/Industrial Parks, Recreational and Open Space areas) and it doesn't prioritize and balance compelling needs and actions.*

CoH Planning System and GP Framework:

- GP is first level - **contains long-range strategies for the entire County**
- Implementation mechanisms that carry out the goals, objectives, policies and actions:
 - CDP (7)
 - Hamakua (2018)
 - Hilo (1975) - 'Envision Hilo' (2005 - not adopted by Council)
'Downtown Hilo Multi-Modal Master Plan (2018 - signed by the Mayor and Public Works and Planning Directors)
 - Puna (2008)
 - Ka'u (2017)
 - Kona (2019)
 - South Kohala (2008)
 - North Kohala (2008)
 - Urban Development Plans (none found online)
 - Special Area Plans (none found online)
 - Agency Functional Plans - Water, Wastewater, Transportation, Solid Waste, Parks & Rec, Climate Action (none found online)
- The Draft states (pg 206) that Agency Functional Plans shall identify priority issues and specific **needs of the agency** and may, but **is not required** to, be adopted by ordinance or resolution.

This Draft not only delegates and keeps hidden the Agency Plans from the General Plan, these detailed Agency 'action plans' don't require adoption. And they were not included with the General Plan to assess their scope and status. Their last revised date and next revision timelines were not included in the Draft GP. These Agency and CDP and other Plans are critically substantive (or should be).

Issue 5: Where is the "plan" in this Draft General Plan?

There is no 'Future Land Use Map' showing the details addressed in the Plan (it would be a proposal that would require much effort to enable with State and County approvals (land use, zoning, ordinances, etc.)). But without a 'to-be' destination, we will be adrift.

Issue 6: Inadequate Implementation Indicators and Monitoring Mechanisms

The Implementation Indicators are inadequate and the Monitoring and Evaluation Plan will not provide a clear 'report card' on progress. The Plan states the objectives are measurable, achievable, and time-bound milestones toward achieving the goal. But this plan does not present the goals and objectives in this form. Below are 'example Indicators' from pg 201 of the Draft. All public utilities have been lumped under one goal. The objectives are neither specific, measurable, nor time-bound. The indicators are not aligned with the objectives. (e.g. stating specifics that show objectives to alleviate our CURRENT and chronic water rationing and power use reduction (rolling brownouts) situation).

Section 3: Public Utilities EXAMPLE INDICATORS

Goal: Our communities are adequately served by sustainable and efficient public infrastructure, utilities, and services based on existing and future growth needs, sound design principles, and effective maintenance practices.

Objectives:

20. Improve the efficiency, reliability, and sustainability of essential infrastructure systems.
21. Strive towards energy self-sufficiency.
22. Advance policies, programs, and initiatives for public and/or private investment in broadband and telecommunications infrastructure.
23. Increase the protection of existing and potential sources of drinking water.
24. Planned and developed municipal sewer capacity is expanded to serve our Urban Growth Areas and reduce sewage-related impacts on water quality.
25. Increase green infrastructure practices. • Utilities are planned for our urban areas • Energy efficiency • Reduce water consumption per household • Increased use of permeable surfaces and landscaping

Example Indicators

- Utilities are planned for our urban areas
- Energy efficiency
- Reduce water consumption per household
- Increased use of permeable surfaces and landscaping

The Monitoring Mechanism ([see reference below](#)) states that “Measurable indicators, or performance measures, will be used to monitor progress toward the objectives”. Unfortunately, this Draft does not provide them. It says “...indicators may vary over time as progress is made and each department is responsible for reporting on the indicators that are relevant”. Every objective should have appropriate and fixed indicators or tracking/reporting will not be reliable or useful over time.

The Evaluation Plan ([see reference below](#)) is required to the extent possible: “An implementation status report annually serving to monitor progress towards achieving the goals and objectives identified within the General Plan. To the extent possible, the report should contain measurable indicators related to the goals and objectives of the plans that make up the County Planning System.” This appears to state that the measurable indicators only apply to goals and objectives of the supporting plans and not the General Plan. Status reports on the General Plan progress can be as vague as the GP goals and objectives, themselves.

In conclusion, the Draft General Plan 2045 should not see the light of day. We expect and need better.

- It doesn't comply with either County or State requirements for County General Plans.
- It violated the principle of clearly showing deltas between the prior adopted Plan and the current draft amendments;
- It does NOT provide a coherent destination (what the future is to look like) or the roadmap of comprehensive actions that will get us there.
- It does not link goals, specific objectives that together achieve each goal, with progress measures. It does not prioritize objectives (actions) to guide implementation planning and budgeting processes.
 - While there are many good ideas in the Draft, they are too many to complete in 20 years, and they are not organized as stated: Goal > Objective (with indicator) model . Objectives are too broad (e.g. there is only one objective for Wastewater “Planned and developed municipal sewer capacity is expanded to serve our Urban Growth Areas and reduce sewage-related impacts on water quality.” It lists 16 Priority Actions (these might actually be mislabeled objectives as there

- was no goal included) But not all of them contribute to accomplishing the ‘Objective’ (three do not pertain to municipal sewer systems in Urban Growth Areas). There are no progress measure indicators and they are not time bound (or priority stack ranked, or dependency linked - any of which would have helped make implementation possible).
- The Monitoring and Evaluation Plan effectiveness is crippled by not providing prioritized time-bound objectives/actions with performance measures. (and made worse by its making indicator measures optional)

HULI PAC’s concerns are clearly and comprehensively stated. The Draft General Plan 2045 is NOT a plan we can use. It has no clear vision, no destination, no clear implementation path. It merely lays the groundwork for future Planning Directors and Mayors to say they made no promises and they have no accountability.

Respectfully submitted,

Anne Harvey
Tanya Yamanaka Aynessazian

On behalf of HULI PAC

REFERENCES & DETAILS

CoH Charter 3-15 - General Plan.

The county council shall adopt by ordinance a general plan which shall set forth the council's long range policy for the comprehensive physical, economic, environmental, and sociocultural wellbeing of the county. (a) The general plan shall contain a statement of development objectives, standards and principles with respect to the most desirable use of land within the county for residential, recreational, agricultural, commercial, industrial and other purposes which shall be consistent with proper conservation of natural resources and the preservation of our natural beauty and historical sites; the most desirable density of population in the several parts of the county; a system of principal thoroughfares, highways, streets, public access to the shorelines, and other open spaces; the general locations, relocations and improvement of public buildings, the general location and extent of public utilities and terminals, whether publicly or privately owned, for water, sewers, light, power, transit, and other purposes; the extent and location of public housing projects; adequate drainage facilities and control; air pollution; and such other matter as may, in the council's judgment, promote the general welfare, health, and prosperity of its people. (b) (c) (d) The council shall enact zoning, subdivision, and such other ordinances which shall contain the necessary provisions to carry out the purpose of the general plan. No public improvement or project, or subdivision or zoning ordinance, shall be initiated or adopted unless the same conforms to and implements the general plan. Amendments to the general plan may be initiated by the council or the planning director. (1979, Prop. 3; 2016, Ord. No. 16-62, sec. 1.)

§226-52 Statewide planning system.

- (a) The statewide planning system shall consist of the following policies, plans, and programs:

- (1) The overall theme, goals, objectives, and policies established in this chapter that shall provide the broad guidelines for the State;
- (2) The priority guidelines established in this chapter that shall provide guidelines for decision making by the State and the counties for the immediate future and **set priorities for the allocation of resources**. The formulation and revision of state functional plans shall be in conformance with the priority guidelines;
- (3) State functional plans that shall be prepared to address, but not be limited to, the areas of agriculture, conservation lands, education, energy, higher education, health, historic preservation, housing, recreation, tourism, and transportation. The preparing agency for each state functional plan shall also consider applicable federal laws, policies, or programs that impact upon the functional plan area. State functional plans shall define, implement, and be in conformance with the overall theme, goals, objectives, policies, and priority guidelines contained within this chapter. County general plans and development plans shall be taken into consideration in the formulation and revision of state functional plans;
- (4) County general plans that shall indicate desired population and physical development patterns for each county and regions within each county. In addition, county general plans or development plans shall address the unique problems and needs of each county and regions within each county. County general plans or development plans shall further define the overall theme, goals, objectives, policies, and priority guidelines contained within this chapter. State functional plans shall be taken into consideration in amending the county general plans; and
- (5) State programs that shall include but not be limited to programs involving coordination and review; research and support; design, construction, and maintenance; services; and regulatory powers. State programs that exercise coordination and review functions shall include but not be limited to the state clearinghouse process, the capital improvements program, and the coastal zone management program. State programs that exercise regulatory powers in resource allocation shall include but not be limited to the land use and management programs administered by the land use commission and the board of land and natural resources. State programs shall further define, implement, and be in conformance with the overall theme, goals, objectives, and policies, and shall utilize as guidelines the priority guidelines contained within this chapter, and the state functional plans approved pursuant to this chapter.

(b) The statewide planning system shall also consist of several implementation mechanisms, including:

- (1) Overall plan review, coordination, and evaluation. Overall plan review, coordination, and evaluation shall be conducted by the office;
- (2) The state budgetary, land use, and other decision-making processes. The state budgetary, land use, and other decision-making processes shall consist of:
 - (A) The program appropriations process. The appropriation of funds for major programs under the biennial and supplemental budgets shall be in conformance with the overall theme, goals, objectives, and policies, and shall utilize as guidelines the priority guidelines contained within this chapter, and the state functional plans approved pursuant to this chapter;
 - (B) The capital improvement project appropriations process. The appropriation of funds for major plans and projects under the capital improvements program shall be in conformance with the overall theme, goals, objectives, and policies, and shall utilize as guidelines the priority guidelines contained within this chapter, and the state functional plans approved pursuant to this chapter;
 - (C) The budgetary review process of the department of budget and finance. The budgetary review and allocation process of the department of budget and finance shall be in conformance with the overall theme, goals, objectives, and policies, and shall utilize as guidelines the priority guidelines contained within this chapter, and the state functional plans approved pursuant to this chapter;
 - (D) Land use decision-making processes of state agencies. Land use decisions made by state agencies shall be in conformance with the overall theme, goals, objectives, and

policies, and shall utilize as guidelines the priority guidelines contained within this chapter, and the state functional plans approved pursuant to this chapter. The rules adopted by appropriate state agencies to govern land use decision making shall be in conformance with the overall theme, goals, objectives, and policies contained within this chapter; and (E) All other regulatory and administrative decision-making processes of state agencies, which shall be in conformance with the overall theme, goals, objectives, and policies, and shall utilize as guidelines the priority guidelines contained within this chapter, and the state functional plans approved pursuant to this chapter. Rules adopted by state agencies to govern decision making shall be in conformance with the overall theme, goals, objectives, and policies contained within this chapter;

(3) The strategic planning processes. The office and other state agencies shall conduct strategic planning activities to identify and analyze significant issues, problems, and opportunities confronting the State, including the examination and evaluation of state programs in implementing state policies and the formulation of strategies and alternative courses of action in response to identified problems and opportunities. Strategic planning processes may include the conduct of surveys and other monitoring instruments such as environmental scanning to assess current social, economic, and physical conditions and trends. In conducting strategic planning activities, the office and other state agencies shall ensure that general public and agency concerns are solicited and taken into consideration. The formation of task forces, ad hoc committees, or other advisory bodies comprised of interested parties may serve to facilitate public involvement in specific planning projects; and

(4) Other coordination processes which include the use of the state clearinghouse process. The state clearinghouse shall coordinate the review of all federally-assisted and direct federal development projects which are covered under the state clearinghouse process. [L 1978, c 100, pt of §2; am L 1984, c 236, §4; am L 1985, c 68, §4; am L 1987, c 336, §4(2); am L 1988, c 70, §7; am L 1991, c 76, pt of §1]

§226-58 County general plans. (a) The county general plans and development plans shall be formulated with input from the state and county agencies as well as the general public.

County general plans or development plans shall indicate desired population and physical development patterns for each county and regions within each county. In addition, county general plans or development plans shall address the unique problems and needs of each county and regions within each county. The county general plans or development plans shall further define applicable provisions of this chapter; provided that any amendment to the county general plan of each county shall not be contrary to the county charter. The formulation, amendment, and implementation of county general plans or development plans shall take into consideration statewide objectives, policies, and programs stipulated in state functional plans approved in consonance with this chapter.

(b) County general plans shall be formulated on the basis of sound rationale, data, analyses, and input from state and county agencies and the general public, and contain objectives and policies as required by the charter of each county. Further, the county general plans should:

- (1) Contain objectives to be achieved and policies to be pursued with respect to population density, land use, transportation system location, public and community facility locations, water and sewage system locations, visitor destinations, urban design, and all other matters necessary for the coordinated development of the county and regions within the county; and
 - (2) Contain implementation priorities and actions to carry out policies to include but not be limited to land use maps, programs, projects, regulatory measures, standards and principles, and interagency coordination provisions. [L 1978, c 100, pt of §2; am L 1984, c 236, §11; §226-61; ren and am L 1987, c 336, §4(11); §226-60; ren and am L 1991, c 76, pt of §1]
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16.1 COMPREHENSIVE REVIEW (1) The Planning Director shall initiate a comprehensive review of the General Plan and prepare a set of recommended amendments for independent review by the Windward and Leeward Planning Commissions and then adoption by the County Council. The comprehensive review shall be initiated not more than ten years after the date of adoption of the previous amendments resulting from a comprehensive review and submitted to the County Council not more than thirteen years after the date of adoption of the previous amendments resulting from a comprehensive review. (2) The Planning Director shall give notice of the comprehensive review to the County Council, Windward and Leeward Planning Commissions, and the general public. The notice shall state: (a) The general scope of review; (b) The opportunity for the County Council, Windward and Leeward Planning Commissions, and the general public to provide their comments and suggestions to the Planning Director; and (c) The initiation date, general sequence of events, and time for completion of the review period. (3) The Planning Director shall establish a deadline for Council-initiated amendments during the comprehensive review which shall be not less than 120 days after the initial notice under section 16.1(2). The County Council may initiate such amendments by resolution. (4) The Planning Director shall conduct public workshops on amendments proposed by the Planning Director and by the County Council. (5) The public shall be afforded 21 days from the date of the last public workshop to provide comments to the Planning Director. (6) The Planning Director shall then submit the amendments proposed by the Planning Director and by the County Council to the Windward and Leeward Planning Commissions for their independent review and separate recommendations within 30 days after the public deadline to submit comments to the Planning Director. The Planning Director shall make a recommendation on any Council-initiated amendments. (7) The Planning Director shall notify a property owner of a proposed amendment that would redesignate its property to Open or Conservation, unless the property is already designated Conservation by the State Land Use Commission. Notice shall be given not less than 21 days before the first Windward or Leeward Planning Commission hearing on the proposed amendment. (8) The Windward and Leeward Planning Commissions shall conduct and complete their independent review on the proposed amendments to the General Plan, and shall

2023 DRAFT_CoH GENERAL PLAN -

Pg 210 - Monitoring and Evaluation Plan

Purpose - Provide regular and predictable ways of measuring progress and preparing for updates.

Monitoring Mechanisms - Measurable indicators, or performance measures, will be used to monitor progress toward the objectives. Examples of indicators that can be used to monitor the progress of implementation have been provided in the table below. However, it is important to note that indicators may vary over time as progress is made and each department is responsible for reporting on the indicators that are relevant.

Progress Reports

Mayor's Annual Report

As part of the Mayor's Annual Report, the County Departments will prepare an implementation status report annually serving to monitor progress towards achieving the goals and objectives identified within the General Plan. To the extent possible, the report should contain measurable indicators related to the goals and objectives of the plans that make up the County Planning System.

5-year Implementation Status Report

The Planning Director will include a 5-year status report as part of the Mayor's Annual report. This status report shall report on the status of any urban development plans, functional plans, special area plans, master plans, and related priority implementation actions. The director may also include information regarding the implementation of private development master plans in the 5year implementation status report.

Comprehensive Review and Update Schedule

The Planning Director shall initiate a comprehensive review of the General Plan and prepare a set of recommended amendments for independent review by the Windward and Leeward Planning Commissions and then adoption by the County Council. The comprehensive review shall be initiated not more than fifteen years after the date of adoption of the previous amendments resulting from a comprehensive review and submitted to the County Council not more than twenty years after the date of adoption of the previous amendments resulting from a comprehensive review. This allows for regular updates and adequate implementation time between updates.
