

COMMENTS ON THE KAUA'I COUNTY DRAFT GENERAL PLAN

Submitted by Anne Walton, Kauai Community Coalition

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Source or Location	Specific Changes, Deletions or Additions Requested; or Areas for Clarification	Additional Comments/Justification
Page 1-1 (proposed revisions #1)	<p><u>Text</u>: "The update of the General Plan presents the opportunity to look at the County as a whole and make consensus-based decisions about issues and opportunities pertaining to growth."</p> <p><u>Need clarification</u>: If this is pertaining to moving forward, it would be good to have an explanation of the process for consensus-based decision making .</p>	
Page 1-1 (proposed revisions #1)	<p><u>Text</u>: "As a direction-setting document, the General Plan is not regulatory in the sense of a zoning code or other land use entitlement. The General Plan's policies are intended to guide County decision-making by mapping land use patterns, describing what type of future development is desirable, and by setting high-level priorities for infrastructure and programs"</p> <p><u>Seems contradictory and/or unsubstantiated</u>: Can't see how the document is direction setting without a clear road map for moving forward. This remains a missing (and critical) element of the plan.</p>	See comment below on regulating terms of entitlement properties.
Page 1-6 (proposed revisions #1)	<p><u>Text</u>: ". . . goals are aspirational in nature. They describe Kauai's ideal and desired state by the year 2035. . . ."</p> <p><u>Requested change</u>: Yes, a vision is aspirational in nature, but goals are meant to establish targets for what is expected to be achieved by 2035. Suggest you create specific, quantifiable targets to be achieved by 2035 for each of the sectors. Without this, we will have a replay of the 2000 General Plan.</p>	This is a comment we have been making for nearly a year, and we never get a clear response on why this never appears in the plan.
Page 1-6 (proposed revisions #1)	<p><u>Text</u>: "The twenty policies update and streamline the policies in the General Plan 2000, while also accounting for new issues and community concerns. In concert, the policies articulate the County's direction and priorities in accommodating and managing future growth."</p> <p><u>Requested change</u>: There seem to be too many policies and they are too generalized.</p>	Oahu's General Plan Update (Feb. 2017) has specific objectives and policies for each sector. This would be worth

	See suggested policies provided by the Kauai Community Coalition on December 14, 2016.	looking at as a model, although it doesn't take it quite far enough in terms of measurable objectives.
Page 1-6 (proposed revisions #1)	<p><u>Text:</u> "Implementation Program – By nature, the General Plan is a high-level guidance document and implementation will require moving forward in several levels of the planning system and across many existing program . The General Plan's Implementation Program is designed for accountability and transparency, and includes evaluation, monitoring, and reporting elements. Together, the implementation elements create a feedback loop thus allowing the General Plan to be a living document which can be amended in a timely manner if need be."</p> <p><u>Requested Change:</u> The Departmental Draft General Plan indicates that the four goals and twenty policies will be used as performance measures. The art and science of performance measures has evolved to such a state that it should not be a feedback system like you have in the GP – which only works because you do not have measureable goals or articulated policies so as long as you are doing something/anything it appears you are complementing the goals and policies. The net result of this feedback system is akin to the 2000 shelved GP. We would rather see the GP structured with: 1) measureable goals (targets) and milestones towards meeting those targets, indicators of success towards achieving results (what is being measured to know if you are making progress), evaluation every 6 months of progress made to date (based on whether milestones are being met), an intersectoral/ interdisciplinary evaluation team, and a reporting system (both a dashboard system for reporting on a 6 month basis and an overall status report every 2 years). This is the only way we are going to get a plan that is actually addressing the issues we are faced today and help the Kaua'i community realize the future it wants to create.</p>	We provided a logic model for developing performance-based activities which appeared in the first Discussion Draft GP, but we can't find it in the Departmental Draft. We suggest you actually apply this model to the plan and use it to prioritize the numerous activities in the GP so that they are targeted towards achieving results for each sector.
Departmental Draft, Watershed Sector, Page 2-3 to 2-18	<p><u>Requested addition:</u> Although this section has vastly improved with your additions (proposed revisions #1), there still seems to be a significant piece missing from the watershed system that is not addressed in the GP.</p> <p>In the Draft GP you speak of mauka and makai components of the watershed, without recognizing the transfer zone in between. The dominant process in this part of the</p>	We are happy to provide further information and text to this section.

	<p>system is the transfer of material through the river and stream networks (channels), but there may be significant temporary storage of water and sediment along the way. The channels act as a conveyor belt for sediment moving intermittently toward the sea during flood events, with material stored temporarily within the floodplain deposits. Movement downstream of fine-grained sediment (which may include sewage waste) and dissolved load is more regular. Biochemical processes in the channel may significantly transform these portions of the river load, especially through the cycling of nutrients and organic matter in the streams.</p> <p>This mid-section of the watershed is important because it represents the area of greatest alteration from human uses, such as residential development and agriculture, to the watershed system. Resource use, waste disposal, sedimentation (as a result of deforestation), and engineering activities (e.g., changes in hydrology due to dams or the redirecting of water resources for agriculture) in one component of the natural system most likely will have impacts on other parts. These in turn will affect the functioning of the human system in these areas. Deepening of a river mouth (from natural causes or dredging) will increase saline intrusion, for example, which may adversely affect the potential for irrigation and water supply further upstream. Release of polluted water in upstream areas may ultimately affect lower stretches of the river and even coastal areas, causing degradation of ecosystems and loss of essential production and regulation functions.</p> <p>Please recognize and address this critical component of the watershed in the GP.</p>	
Page 2-83	<p><u>Text</u>: "Allow existing resort entitlements to build out and require any non-entitled resort-designated areas in the General Plan to attain full State and County zoning resort-related approvals by the year [2022]2027, or within [five]ten years of Community Plan approval is (typo) an area is conditionally designated. . . ."</p> <p><u>Disagree with change</u>: Please leave this "use it or lose it" provision as is in the Departmental Draft (5 year sunset). Many of the other sector issues such as infrastructure needs and traffic impacts are related to the this issue in general (even though this seems specific to Princeville) and there is no point of having "policies to guide growth" in the Draft GP if you make this recommended change.</p>	<p>This is completely contradictory to all the discussions and public input anyone of our group has heard on the subject. Additionally, when this was presented to the Planning Commission on 02/28/17, this change was shown as</p>

	<p><u>Text</u>: "Also require short-duration expiration dates should development not be constructed as permitted."</p> <p><u>Comment</u>: Separate from the above recommendation from the Planning Dept., we do agree with this component of their recommendation.</p>	<p>a few words on a slide with a whole laundry list of recommended changes and not fully explained.</p>
Missing Component	<p><u>Comment</u>: QUALITY EDUCATION.</p> <p>Although the addition of the descriptor on "Supporting the Language, Culture, and Knowledge of Kaua'i" greatly enhances the "Access to Quality Education" section, we still believe that EDUCATION should be a stand alone sector as it is so critical to meeting the future vision for Kaua'i and meeting some of the basic needs addressed in the GP.</p>	<p>See full set of comments on education provided to the Planning Dept. 12/16/16.</p>
Missing Component	<p><u>Comment</u>: NATURAL ENVIRONMENT.</p> <p>The treatment and emphasis on the natural environment is woefully neglected in this document and would be better served as a stand-alone component. This is especially true for an island that values its scenic value, recreational opportunities dependent on the natural environment and need for increased food security. For instance, there is no discussion on the value of an intact ecosystem and the services it provides in regards to both the environment and humans. This is a cross-cutting sector that has social, cultural, economic and biodiversity protection implications. It also directly pertains to the first 3 goals in the GP (sustainable island, unique and beautiful place, healthy and resilient people), as well as at least 8 of the 20 policies.</p> <p>Please create a stand-alone section on the natural environment. Or, at the very least create a more robust discussion and activities specific to environmental protection in the watershed sector.</p>	<p>The Planning Dept. has stated that they felt the environment is already incorporated into the watershed sector, as well as other sectors, we don't find it adequately treated.</p> <p>We are happy to provide some structure and content for this sector.</p>