

Comments on Supplemental 6 - Draft General Plan, June 13, 2017

Submitted By Anne Walton, June 8, 2017

Please note that the following comments do not supercede the last nine sets of comments I have made on the General Plan Update, but rather should be viewed in addition to those comments.

LOCATION	TEXT FROM SUPPLEMENTAL 6 – DRAFT GENERAL PLAN	COMMENTS
2-1 to 2-48 and 5-13 to 5-41	Please put the “Future Land Use” and “Policy Maps” in consecutive order. This is functionally the narrative and it’s complementary spatial component separated by 300 pages.	For the electronic viewer, this is hugely inconvenient to flip back and forth. And, this is a poor strategy to separate such integral sections and place them as far a part as possible.
3-13	<p>Objective: To preserve and protect sandy beaches and public access to the shoreline.</p> <p>LANGUAGE FOR OBJECTIVE: To preserve, protect and ensure access to our shoreline and nearshore waters.</p> <p>LANGUAGE FOR MARINE DEBRIS: Marine debris consists of man-made objects cast adrift in the ocean, either washed into the water from land-based sources or discarded from vessels at sea. In particular, plastics and derelict fishing gear pose a hazard to both humans and wildlife, including impacts on endangered species such as monk seals, sea turtle and humpback whales, as well as seabirds and coral reefs.</p> <p>ACTIONS FOR MARINE DEBRIS: 1) Reduce sources of marine debris through prevention programs. 2) Support and sustain removal of marine debris programs.</p> <p>LANGUAGE FOR WATER QUALITY: Surf rider sampling over the years has documented chronic levels of pollution at Hanamaulu stream, Nawiliwili stream at Kalapaki Bay, Niumalu Beach Park, and Waikomo stream at Koloa Landing. More recently we discovered that Waiopili Stream at Mahaulepu is 10 times more polluted with feces than the others above. For most of these streams, water quality varies throughout the year and is largely dependent on precipitation levels, generally experiencing higher bacterial levels during the winter months. The Hawaii Department of Health has yet to put up caution signs at even some of the chronically worst sites (Moloa’a stream mouth, Waikomo stream at Koloa landing, Nawiliwili stream at Kalapaki, and all 3 canals in Kapa’a).</p>	Water quality and marine debris are a major impact on the shoreline and need to be mentioned in this section.
3-15	<p>2. Provide an open, vegetated visual buffer between the shoreline and buildings.</p> <p>CHANGE LANGUAGE TO: Provide an open, <u>native</u> vegetated visual buffer between the shoreline and buildings.</p>	

3-16	<p>4. PARTNERSHIP NEEDS, b. Address loss of beach areas due to sea level rise through a comprehensive beach management strategy, including local financing plans for beach and dune restoration.</p> <p>CHANGE LANGUAGE TO: b. Address loss of beach areas due to sea level rise through a comprehensive beach management strategy, including local financing plans for beach and dune restoration and maintaining open space adjacent to coastlines that allow for natural retreat (migration) of beaches and dunes due to sea level rise.</p>	
3-19	<p>3.PARTNERSHIP NEEDS, J., 4. Encourage new development to implement voluntary actions to encourage a net gain in protection efforts of our threatened and endangered species.</p> <p>CHANGE LANGUAGE TO: 4. <u>Require</u> new development to implement <u>standardized protocols</u> to encourage a net gain in protection efforts of our threatened and endangered species.</p>	<p>There is responsibility here pursuant to State of Hawai'i endangered species law, codified in Chapter 195D, Fish and Wildlife Service, pursuant to section 10 of the Federal Endangered Species Act</p>
3-21, PP3	<p>II. HOUSING, Understanding the High Cost of Housing</p> <p>Many complex factors drive housing costs. These include slow inventory growth, off-island demand, <u>limited developable land</u>, a lengthy entitlement process, and high infrastructure and construction costs.</p> <p>CHANGE LANGUAGE TO: Many complex factors drive housing costs. These include slow inventory growth, off-island demand, a lengthy entitlement process, and high infrastructure and construction costs.</p>	<p>There seems to be plenty of opportunities to develop through both infill and entitlement properties.</p>
3-21, PP4	<p>II.HOUSING, Understanding the High Cost of Housing</p> <p>In order to confront the housing crisis, public and private sectors must work together to increase housing inventory that will be affordable to residents.</p> <p>CHANGE LANGUAGE TO: In order to confront the housing crisis, public and private sectors must work together to increase housing inventory that will be affordable to residents, <u>and maintained as part of the inventory of affordable housing in perpetuity.</u></p>	
3-28	<p>2. PARTNERSHIP NEEDS, c. Leverage market-rate development to support long-term affordable housing through inclusionary zoning and other tools.</p>	<p>What does this mean? This is not clear.</p>
3-37, last PP	<p>Accomplishing these targets will require strategic implementation of specific projects and actions, as well as a 'cultural shift' in personal transportation choices. A shift in personal transportation choices occurring over time is supported by nationwide trends, including the following:</p> <p>Decline or delay in personal car ownership by millennials</p>	<p>This is referenced as a nationwide trend, but nowhere in the action items is this addressed, and also wondering why</p>

	Willingness by millennials to use transit and other modes of transportation	the onus is only on millennials. What about the tourism industry, for instance. No mention of reduction there, although the plan does suggest alternatives to weekly car rentals.
3-41	4. PARTNERSHIP NEEDS, a. As a percentage of total trips, increase transit trips to 3.6%, walk trips to 11.5%, and bicycle trips to 7.6% by 2035, compared to baseline 2010 data of 0.4% for transit, 4.5% for walk, and 2.0% for bicycle trips.	Why do you want such a huge increase in transit trips between now and 2035? Also the way this is written is very confusing. In general for transportation section, 2 things are missing: 1) no clear plan to actually reduce the number of cars, and 2) no green approach, which would actually also create an opportunity to address Green House Gas Emissions.
3-54, last PP	Improving How Infrastructure Supports New Growth Typically, the burden of paying for the infrastructure to service new development falls on the developer. In turn, these costs are carried over to the buyer. In order to alleviate the housing crisis by supporting growth in the desired areas, government will need to help provide this infrastructure. The County should use its ability to invest in infrastructure as a tool to encourage growth where it is desired. However, for this to occur, infrastructure improvements and land use planning will need to be more closely coordinated. We need to look to partnerships to provide the funding needed for new infrastructure required by growth. Examples include the creation of special districts and innovative public/private partnerships.	Why should the onus be on the public to bare the burden of infrastructure development required for new developments? With the exception of perhaps truly affordable housing, this burden belongs to the entity the will reap the financial benefits.
3-55, PP1	Water Planning and Capacity Challenges Kaua'i is blessed to have an abundance of high quality water. However, our aging infrastructure can make it challenging to address water source, storage, and distribution needs. The Water Plan 2020 document has not been officially updated since 2001, but is revisited yearly by the Department of Water (DOW) to	Why not consider limiting the number of water meter permits as a way to control growth like they do on Maui.

	<p>reprioritize improvements and be in sync with current land development needs. However, the coordination between DOW improvements and long range land use planning can and must be improved. The lack of coordination has led to inefficiencies and delays as the DOW requires lead time in process permitting and funding. As a result, this has had the effect of delaying or even halting construction of new housing and commercial projects. Additionally in some areas there are legal challenges that question the validity of diverting water resources for any purpose based on the public trust doctrine. Before water and associated facilities for extraction, storage, and distribution can be allocated to support growth, these legal cases and planning gaps need to be addressed.</p>	<p>This would also help contribute to "Enhancing Water Conservation" (3-57)</p>
3-66	<p>3. Projects and Programs d. Divert at least 70 percent of solid waste from landfill sites to recycling and reuse by 2023. CHANGE LANGUAGE TO: d. Divert at least 70 percent of solid waste from landfill sites to recycling and reuse by 2023 <u>by increasing amount of biodegradable packaging materials and decreasing the use of plastics, Styrofoam and other non-biodegradable products through the use of county ordinances.</u></p>	<p>With this new language, this may then be moved in whole to "b". Permitting Actions and Code Changes – create new subsection "b".</p>
3-68	<p>2. Partnership Needs b. Update the Lihue Airport Master Plan and address capacity issues CHANGE LANGUAGE TO: b. Update the Lihue Airport Master Plan and address capacity issues <u>that are consistent with the desire to control visitor numbers to address quality of life factors for residents such as maintaining the rural character of Kauai and addressing issues such as traffic congestion.</u></p>	
4-11	<p>Table 4-2 sets forth a framework for assessing incremental actions as they arise, either in the form of budgetary decisions, permitting proposals, policy changes or similar acts. As a practice, those agencies should become accustomed toward contextualizing their individual jurisdictional activities with the General Plan in this manner.</p>	<p>This is a good model in table 4-2, but should also be applied to the General Plan, not just "incremental actions as they arise".</p>
4-12	<p>4.2.3 TRACKING AND REPORTING PERFORMANCE MEASURES AND ACTION IMPLEMENTATION To ensure transparency and community participation in the implementation and monitoring of progress toward the vision, the Planning Department intends to establish a "Kā kou Committee" appointed by the Mayor's office. Such a committee would include both public and private partners that have a stake in implementing the General Plan</p>	<p>Needs to be a more transparent public process than the Mayor selecting the committee members.</p>
4-12	<p>4.2.4 COMMUNITY EDUCATION & CAPACITY BUILDING Kaua'i's planning system is complex. From the State Land Use Districts to County zoning, it is difficult for</p>	<p>This should also apply to the Planning Commissioners who, as</p>

	<p>many to understand the terminology and potential impact of community planning. Education, especially focused at youth, has the potential to increase the quality of input and level of discussion on complex issues where tradeoffs are involved. During the General Plan process, many community members expressed a desire to be more educated about land use planning. The Planning Department is already working with some schools on youth planning curriculum, and is considering offering "Planning 101" seminars to coincide with the General Plan monitoring cycle. – this should also apply to the Planning Commissioners who, as volunteers, have limited capacity and understanding of the complex planning issues. Much like the KIUC board, who goes through a series of rigorous trainings preparing them for their job, so should the Commissioners.</p>	<p>volunteers, have limited capacity and understanding of the complex planning issues. Much like the KIUC board, whom go through a series of rigorous trainings preparing them for their job, so should the Commissioners.</p>
<p>CONTRADICTIONS TO THE PROPOSED ZONING CHANGES FOR AREA AROUND KAPA'A MIDDLE SCHOOL</p>		
2-2, PP2	<p>Consistent with the desire to limit growth North of the Wailua Bridge due to congestion concerns, the majority of growth is steered to the Lī hu'e and South Kaua'i Planning Districts. This also serves to reduce the cost of living by locating more housing near major job centers.</p>	<p>This contradicts the zoning changes</p>
2-5, PP3	<p>It is the County's policy to preserve and protect Agricultural lands, particularly those of the highest quality. Therefore, Important Agricultural Lands (IAL) are also identified on the Future Land Use Map. Preserving agricultural lands contributes to self-sufficiency and helps preserve Kaua'i's rural character and lifestyle. Agriculture lands are held in reserve for agricultural purposes with little residential development. These areas range in scale from large agricultural fields to small diversified farms.</p>	<p>This contradicts the zoning changes</p>
2-5, PP4	<p>While the 2000 General Plan acknowledged issues related to residential encroachment into agricultural lands, this development pattern continued to expand, especially on the North Shore and East Kaua'i. The General Plan recognizes that residential development on agricultural lands is an unsustainable trend, and emphasizes preserving agricultural lands in intact form while limiting other uses. When development does occur, it should be clustered so as to minimize the requirements for new infrastructure and the impacts on open space and adjacent land uses.</p>	<p>This contradicts the zoning changes</p>
2-7, 4PP	<p>Changes from the Previous General Plan Land Use Map Previously, the Urban Center designation was applied to "centers of government, commerce and transportation that serve the entire County or a large region." In addition to Lī hu'e, this included Port Allen, and an area adjacent to Kapa'a Middle School. The Urban Center designation is replaced with Neighborhood Center and Industrial in Port Allen, and Neighborhood Center (agree) and General (disagree) in Kapa'a. The policy addressing Wailua-Kapa'a Traffic and managing growth north of the Wailua Bridge influenced the decision to remove the swath of Urban Center from the area adjacent to Kapa'a Middle School.</p>	<p>Effectively, there is no difference between "Neighborhood General" and "Urban" – this is just new code language for the same thing. For all intents and purposes, "Neighborhood Center" and</p>
2-6	<p>FOR ADDITIONAL REFERENCE:</p>	

	<p>E. Neighborhood General</p> <p>The Neighborhood General Designation applies to areas within a quarter mile, or five-minute walk, from Neighborhood Centers. This designation is intended for medium intensity mixed-use environments that support the town core with housing, services, parks, civic/institutional, home occupation, and commercial uses. Buildings in this designation are mostly detached, with some attached, 1-2 stories in height that can accommodate a range of multifamily housing types.</p> <p>Changes from the Previous General Plan Land Use Map</p> <p>Neighborhood General is a new designation. It was designated over the existing Urban Center and Residential Community designation where it was included within a quarter mile radius of Neighborhood Center. This included the Agriculture Designation in some areas.</p> <p>Changes from the Previous General Plan Land Use Map</p> <p>Previously, the Urban Center designation was applied to “centers of government, commerce and transportation that serve the entire County or a large region.” In addition to Lī hu’e, this included Port Allen, and an area adjacent to Kapa’a Middle School. The Urban Center designation is replaced with Neighborhood Center and Industrial in Port Allen, and Neighborhood Center and General in Kapa’a. The policy addressing Wailua-Kapa’a Traffic and managing growth north of the Wailua Bridge influenced the decision to remove the swath of Urban Center from the area adjacent to Kapa’a Middle School.</p>	<p>“Neighborhood General” are a distinction without a difference when it comes to development.</p>
2-11, PP1	<p>1) Whether or not future development aligns with the Map is dependent on action taken by the State Land Use Commission, individual developers and elected officials. The economic situation of the State and County will no doubt impact the pace of implementation as well.</p>	<p>THE COUNTY NEEDS TO TAKE LEADERSHIP AND DIRECT OUR FUTURE!</p>
2-12	<p>Use the community planning process to update and refine the Future Land Use Maps as needed.</p>	<p>If you are considering that the “Place Typing” exercises adequately addressed this, you are woefully wrong. That exercise was a lot of pomp without the circumstance.</p>
2-12	<p>Applied place types and <u>right-sized</u> Neighborhood Centers in Waimea-Kekaha, Hanapē pē -‘Ele’ele, East Kapa’i, and North Shore</p>	<p>The “Place Types” we ended up with in Kapa’a are not “right sized” for Kapa’a, nor the ones we asked for.</p>
2-41	<p>PRELIMINARY VISIONS AND PRIORITIES</p>	<p>This contradicts the</p>

	By 2035, We Envision an East Kaua'i Where: Residents enjoy a high quality of life in a rural setting Natural resources are protected and open spaces and public access are preserved Agricultural lands are farmed, productive, and protected. Affordable housing opportunities exist for local residents	zoning changes
2-42, PP1	<p>KAPA'A TOWN</p> <p>Kapa'a Town's future growth pattern depends largely upon the intensity of implementation related to a key community policy related to traffic north of the Wailua bridge. The 2000 General Plan does earmark large residential growth at the Hokua Place property near Kapa'a Middle School. The area is designated as Urban Center. However, community opinion remains divided, with strong concerns about the perceived impacts of the proposed development on traffic. Supporters cite the great need for housing and the consistency of the Hokua Place proposal with smart growth principles. Others feel that the proposed traffic mitigation measures won't be enough to counteract negative impacts, that sewer infrastructure is constrained, and that because of the East Kaua'i congestion, affordable housing development should be concentrated in Lī hu'e. Another concern is that much of Kapa'a Town is within tsunami evacuation and flood zones. Sea level rise projections show that much of the area could be inundated if SLR reaches 3 feet, as is currently anticipated by the year 2100. These considerations raise further questions about how much growth should be encouraged and accommodated within the Kapa'a-Wailua corridor.</p>	This contradicts the zoning changes
2-42, PP2	In the second alternative, Kapa'a would maintain as a Small Town place type, concentrating growth in and around 3 nodes of existing development along the Kū hiō Highway rather than at Hokua Place. In this alternative residential growth would be absorbed on opportunity sites in and around central Kapa'a. This alternative would require more intense development patterns in order to accommodate a similar amount of growth as the first alternative.	This is the alternative that is best supported by the narrative in the GP.
2-43	<p>Land Use Map Changes for East Kaua'i</p> <p>Urban Center</p> <p>The previous Urban Center designation on and surrounding the Kapa'a Middle School has been updated to Neighborhood General and <u>refined</u> to be located within a 1/4-mile of the Neighborhood Center designation near the roundabout.</p>	From what I can tell on the maps, "refined" means that it was simply expanded so that it qualified for being located within ¼ mile of the Neighborhood Center designation. What transpired here should be more transparent.
2-44	<p>GOAL: Accommodate East Kaua'i's projected housing needs.</p> <p>b. In new communities, ensure the majority of units are "missing middle housing" and affordable by design.</p>	That you do have with Hokua Place. But really,

		are you sure you want to be “missing middle housing” – that could certainly be used as a justification for Hokuia Place because that’s what it is missing.
3-21, PP4	New market construction may have increased housing inventory but it has not produced the range of housing needed to serve Kaua’i’s workforce. Over eighty percent of residential development is single-family construction that occurs on Agriculture, Open and R-1 through R-4 zoned land. This has exacerbated Kaua’i’s low-density development paradigm, where new single family homes sell upwards of \$800,000. In order to confront the housing crisis, public and private sectors must work together to increase housing inventory that will be affordable to residents.	This contradicts the zoning changes, or you might say this is what Hokuia Place is contributing to.
3-25	Countering the Threat of Residential Sprawl Decentralized development or residential sprawl onto agricultural and open-zoned land erodes our rural character and town centers.	This contradicts the zoning changes