

## Review of Draft General Plan – August 2017

Submitted by Anne Walton

LOCATION	TEXT/INFORMATION	PROPOSED CHANGE(S)	RATIONALE
<b>SECTIONS: Introduction + Vision, Goals and Policies for the Future</b>			
1	Introduction, Pg. 20, pp5	A trend reversal in the type of growth our island sees will largely depend on the outcome and implementation of plans like this one. the general Plan is a call to arms, making the tough decisions to steer us on the right path. But collective agreement to make hard choices relies on accurately representing the community tenor and ensuring solutions have buy-in. therefore, the public process placed great effort on "listening" rather than "telling."	<b>Comment on Process:</b> For most of the public that has followed this entire process closely and commented on the 1-9 actual versions of the Draft General Plan, the majority will tell you they can't identify where their comments, concerns or ideas are reflected in this General Plan. This statement to the left, which you will hear over again from the Planning Dept. does not ring true to those who have actively participated for the duration of the process.
2	Vision Goals and Policies, Pg. 23, pp2, sentence 2	The policies guide county decision-making by mapping land use patterns, describing <b>what type of development is desirable</b> , and by setting high-level priorities for infrastructure and programs. This will impact development code revisions, district and zone amendments, discretionary project approvals, and capital projects planning.	<b>Comment on Process:</b> It is has never been clear what the process is for determining "what type of development is desirable". The General Plan is wrought with contradictions on this issue, speaking out of one side of the mouth about controlling growth and maintaining quality of life and the rural character of Kaua'i, while of the other side fully supporting large land owners, developers and the tourism industry in regards to proposed actions. These kinds of contradictions occur because there is no clear growth model guiding this Plan. <b>Recommendation:</b> Until the GP clearly established the growth model it is working under, please do not accept a GP that is so full of contradictory messages.
3	Pgs. 23-24, last lines of 23 and first lines	Together, the General Plan, the community plans, and the functional plans set long-term policy directing development of the	<b>Comment on Process:</b> There seems to be little actual consideration of the community plans (many of them outdated), but even more so for the community

	of 24	land use ordinances and the Capital Improvements Program.	planning process. There were some major decisions in this plan, including community place typing and specific future land use changes that should fall under the purview of communities and community plans. <b>Recommendation:</b> Remove the consideration of Princeville-Phase II, Hokua Place and Lima Ola that are buried in the 288 pages of this GP, and put them each through their own due process where there can be ample participation and input from the respective communities.	
4	Pg. 24, section 1.1.3, pp1, sentence 2	The plan's framework represents Kaua'i's approach to managing future growth and unifies the vision, goals, policies, objectives, actions, and maps.	<b>Comment:</b> Yes, the Plan does provide a structural framework, however, if your read the text, there is no substance and therefore no standards to hold the GP to in order to know if it actually achieving any results. <b>Recommendation:</b> Until there is a clear growth management framework, and complementary goals, policies and objectives, there is now way to evaluate the effectiveness of the GP policies and maps.	
5	Pg. 26, section 1.2.1, pp3, sentence 2	To the year 2035, Kaua'i will continue expanding its resident and visitor population base, thus increasing the demand for new housing and jobs.	<b>Comment:</b> When read in the context of this whole paragraph, Kaua'i sounds like a victim of in-migration, as if it has no control. If we were to have a clear growth management framework and controls in the GP, then we could create incentive/disincentive programs, growth controls and moratoriums. There are models of practice (e.g. Santa Barbara) that made these tough decisions as far back as the 1970s. <b>Recommendation:</b> We need a clear growth management framework and complementary policies.	
6	Pg. 27, pp1, sentence 4	The visitor arrivals forecast shows an overall growth of about one percent per annum between 2010 and 2035 (see Table 1-4).	<b>Correction:</b> Since 2010, the Average Daily Visitor Census (ADVC) has grown at a rate of 4.0% per year. If growth were to continue at that rate, by 2035, the ADVC would increase by 112% to 52,600. (2010 ADVC = 19,548 (General Plan, Figure 3-9). 2016 ADVC = 24,797 (General Plan, Table 3-3). This is 26.9% over 6	These numbers are so critical to everyone of the sectors that this GP cannot effectively address the issues

			years, a compounded annual growth rate of 4.0%.)	w/o this data correction.
7	Pg. 29, section 1.1.2, pp1	The general Plan is based on the community’s vision for Kaua’i’s future. Phase II of the update process utilized a broad and inclusive public engagement program to develop the Plan.	<b>Comment:</b> After having fully participated in this process for nearly two years, I still don’t know whose vision this is, but is certainly does not reflect any of the public input I heard. In fact, I am not really clear what the vision is and where it is suppose to take us.	
8	Pg. 32, Vision and Goals	<ul style="list-style-type: none"> <li>▪ Kaua’i is a sustainable island, rooted in principles of aloha and mālama ‘āina, and remarkable in its thriving ecosystems.</li> <li>▪ Kaua’i is a place where conservation and restoration of land and water resources provide the foundation of sustainable policies for land use, energy, infrastructure, society, and economy.</li> <li>▪ Kaua’i is a resilient community that shares kuleana in planning for the future, proactively. . . .</li> <li>▪ Kaua’i is a place where rural character and natural landscapes are preserved . . . .</li> </ul>	<b>Comment:</b> These vision and goals are just not consistently adhered to in the General Plan. Either consistently commit to them, or do not have them in the GP.	
9	Pg. 33, Goal #1, pp, 1-4	GOAL #1: Kaua’i residents widely agree that sustainability should drive planning for the future. This recognizes that Kaua’i’s natural environment provides the foundation for a sustainable and equitable society, which in turn creates and supports a sustainable economy. The 2000 General Plan broke ground toward recognizing sustainability goals for the county, but this General Plan is the first to adopt it as an	<b>Comment:</b> On paper, this goal makes this GP sound brilliant. However, this narrative does not match the actions throughout the GP and consequently the GP is very schizophrenic in that the narrative and the actions are so disconnected.	

		<p>overarching goal.</p> <p>sustainable development does not endanger the natural systems that support life: air, water, soil, and living organisms. It means meeting the basic needs of society and extending to all people the opportunity to satisfy their aspirations for a better life. It means integrating economic and environmental considerations in policy and decision-making. A key concept related to sustainability is managing growth without depleting the natural environment.</p> <p>many feel the island is near or at carrying capacity with regard to resources, such as parks, roads, and public infrastructure.</p> <p>there is also concern that Kaua'i's natural resources and ecosystems are being irreversibly stressed or depleted.</p> <p>addressing these issues sustainably means frankly assessing the existing conditions and identifying the tools and resources available to provide for their sustainable use and protection into the future.</p> <p>There is a common desire to manage or limit growth, visitor traffic, and development on Kaua'i.</p>		
10	Pg. 38, Policy #1	<p><b>POLICY #1:</b> Manage Growth to Preserve Rural Character</p> <p><i>Preserve Kauai's rural character by limiting the supply of developable land to an <b>amount adequate for future needs.</b> Prohibit development not adjacent to towns. Ensure new development occurs inside growth boundaries and is compact</i></p>	<p><b>Comment:</b> On paper, this policy makes this GP sound brilliant. However, this narrative does not match the actions throughout the GP and consequently the GP is very schizophrenic in that the narrative and the actions are so disconnected. Also, "amount adequate for future needs" is in question for two reasons: 1) the data and projections are misrepresented, and 2) until we have a clear growth policy how can we determine</p>	

		<i>and walkable.</i>	what kind of development is appropriate? And, there are a lot of ideas how to do this, but they are only appropriate to the extent they support the growth model.	
11	Pg. 39, Policy #3, pp1	An overriding theme from community input is the appreciation of Kaua'i's distinct towns separated by open space. This physical attribute contributes to the rural character so valued by residents and visitors.	<b>Comment:</b> This is completely contradicted by the proposed Future Land Use changes for Hanapepe (Lima Ola), Kapa'a (Hokua Place) and Princeville (Princeville-Phase II). <b>Recommendation:</b> Remove these 3 proposals and defer them to the respective communities.	

**OVERALL ASSESSMENT: Visions, Goals and Policies for the Future**

Although "growth", the overriding theme of this General Plan, has been described from every angle from the need for sustainability, to accommodating future projections on in-migration, to the need to be realistic, at no point is a clearly articulated growth framework put forth in this Plan. Without this framework, it is nearly impossible to align the goals, policies and objectives. And without aligned goals, policies and objectives, how can one evaluate the actions in this General Plan to both prioritize them and determine if they are the right actions to lead us to the results we want. This problem is systemic to the Plan and needs to be corrected.

The narrative throughout the General Plan for the most part hits on all the key issues, and is almost prosaic in its description of the issues.

However, in many cases throughout each sector, the actions do not match the narrative in that they are not really fully addressing the issues, and at times there are contradicting one another. Specific examples are cited in the sector review sections below.

LOCATION	TEXT/INFORMATION	PROPOSED CHANGE(S)	RATIONALE	
<b>SECTOR: The Watershed</b>				
1	Pg. 99, Objective	Objective: To conserve the upper watershed and restore native habitat and forested areas.	<b>Suggested new language:</b> Objective: To conserve the upper watershed and restore native habitat and forested areas <b>to the baseline level established in the 1987 DLNR forest coverage and habitat typing inventory</b> (this is just an example as we need to have a benchmark for what "restore" means).	The standard in planning for an objective is the SMART objective: S: specific M: measureable A: attainable R: relevant T: time bound
2	Pg. 99, Permitting and Code	1. Review State DLNR Forest Reserve Plans when development is adjacent to Forest Reserves.	1. <b>Suggested new language:</b> Ensure compliance and consistency with DLNR Forest Reserve Plans when development is adjacent to Forest Reserves in order to	Proposed changes recommended to clarify actions in the

	Change (Upper WS)	2. Require best management practices for resource management.	control cascading impacts. 2. <b>Comment:</b> Require best management practices for what? Forest reserves? Development adjacent to forest reserves? Of whom are these BMPs being required?	plan so that we know what is to be implemented.
3	Pg. 99 Projects and Programs	1. Support projects that restore and protect our remaining endemic forests and landscapes in the upper watershed. 2. Develop collaborative projects that support goals shared by the Forest Reserve Management Plans, County's Open Space Commission, Na Ala Hele Commission, the Kaua'i Watershed Alliance and others.	<b>Comment:</b> Both of these actions should provide more specificity in terms of what "support projects" means – what level of engagement and by whom, and what kinds of projects. The same comment applies "develop collaborative projects".	Without more clarification, these types of actions will never actually result in taking action.
4	Pg. 100, Objective	Objective: 1) To protect, restore, and enhance freshwater resources to support aquatic, environmental, and cultural resources; and 2) to recognize and mitigate impacts from the built environment to the mid-watershed area.	<b>Suggested new language:</b> Objective: Within the mid-watershed area: <b>1) To restore, enhance and protect freshwater resources to conform with their natural hydrological function and flow within the watershed topography;</b> <b>2) To identify and restore traditional cultural access to and uses of freshwater resources;</b> <b>3) To identify and mitigate impacts from the built environment that are disruptive to the natural hydrology of the watershed and access to water as a cultural resource.</b>	Too much was lumped together to make it a meaningful set of objectives.
5	Pg. 100, Partnership Needs	1. Improve the management and protection of Kaua'i's forest resources and upper watershed areas in the Conservation District. 4. Increase opportunities for public access to forests in a way that is ecologically sustainable. 5. Support the establishment of community-based councils to assist with watershed management issues.	1. <b>Comment:</b> This is so generalized it is difficult to know what this means. Should specify specific partners like Kaua'i Watershed Alliance or DLNR and include examples on ideas how to "improve" management and protection. 4. <b>Suggested new language:</b> Increase opportunities for public access to forests in way that is ecologically sustainable by working with DLNR on controlling entry points, controlling access through forests (e.g., maintained trail system), and	

			controlling the types of activities that can take place. 5. <b>Comment:</b> How do these watershed councils intersect with the suggested watershed task force, the aha moku or groups like the Hanalei Watershed Hui?	
6	Pg. 101, section 2.1, pp. 3, sentence 2	In addition, groundwater levels are affected by the combined effects of prolonged drought, withdrawals, and the reduction of agricultural irrigation . . .	<b>Correction:</b> In addition, groundwater levels are affected by the combined effects of prolonged drought, <b>withdrawals for existing (and new) residential and commercial developments</b> , and the <b>increases in use for</b> agricultural irrigation . . .	
7	Pg. 101, section 2.1, pp.4,	Our aquifers depend on continued recharge by seepage from rainfall and stream flows through permeable ground surfaces.	<b>Suggested addition to follow this sentence:</b> Since aquifer replenishment is dependent on the continual input of water, which has the potential to be interrupted by climate change and corresponding changes in levels of precipitation, we need to consider the potential for drought. And its impact on our water supply.	
8	Pg. 103, section 2.2, pp.4, last word	Most nonpoint source water pollution on Kaua'i is due to erosion from lower elevation development-related activities, such as agriculture and from grading, grubbing, and <b>stockpiling</b> .	<b>Comment:</b> What does "stockpiling" mean? Is this the right word? If so, stockpiling of what – water?	
9	Pg. 103, section 2.3, pp.2, sentence 4	The development of instream flow standards (IFS) is a scientific process which analyzes hydrologic conditions and non-stream uses. Continued stream diversion and lack of IFS, along with decreasing stream levels in some areas, are issues of concern for some communities.	<b>Recommendation:</b> In the actions for this section there should be a priority recommendation for an IFS study and this is not mentioned at all in the General Plan.	This study is important for us to understand sources of water, flow, and the impacts from redirecting water. It is also important for understanding fair and equitable distribution and access to water as a public trust

				resource, particularly in the face if new residential and commercial development proposed in the GP.
10	Pg. 104, Permitting and Code Change	3. Ensure that Good Agricultural Practices and other runoff reduction measures are addressed when reviewing when agricultural grading permit exemptions.	3. <b>Suggested new language:</b> Establish mandatory <b>Best Management Practices</b> standards for runoff reduction measures to be incorporated in requirements when issuing a permit for agricultural grading.	Language was too vague and not enforceable.
11	Pg. 104, Permitting and Code Change	5. If large detention basins are required to control drainage, design them for multiple uses and treat them as an important tool.	5. <b>Suggested new language:</b> When large detention basins are required to control drainage, design them for multiple uses, such as green filtration systems or aquatic wildlife habitat, to maximize their utilitarian value.	Need to clarify language and provide examples of what this is pointing to,
12	Pg. 104, Plans and Studies	2. Establish a drainage system database to better understand the drainage network on Kaua'i and to assist with water quality and quality impacts.	2. <b>Suggested new language:</b> Develop and maintain an up-to-date drainage system geospatial database to better understand the specific location and extent of the drainage network, areas for potential impacts on the drainage system and key areas of concern for compromised water quality.	Want to make sure there is a spatial component (maps) that are part of the database and clarification on the value of this.
13	Pg. 104, Partnership Needs	1. Collaborate with community groups and stakeholders to better manage water resources in a cooperative fashion, avoiding adversarial fights that can divide the community.	1. <b>Suggested new language:</b> Collaborate with community groups and stakeholders to better manage water resources in a cooperative, inclusive and equitable fashion and to ensure all public trust rights and obligations are adequately addressed.	Editorial
14	Pg. 105, Objective	Objective: To protect and enhance coastal resources and public access to the shoreline.	<b>Comment:</b> It is not clear what this is trying to say. It most likely should be two objectives.	
15	Pg. 105, Preamble, 3 <sup>rd</sup>	However, coastlines are dynamic by nature and face constant threat from development,	<b>Suggested new language:</b> However, coastlines are dynamic by nature and face constant threat from	Need to incorporate climate impacts into



	sentence	erosion, hurricanes, and tsunamis.	development, erosion, hurricanes, tsunamis and <b>sea level rise.</b>	our thinking.
16	Pg. 105, section 3.3, 3 <sup>rd</sup> sentence	Based on best available science, we should plan for three feet of sea level rise by 2100.	<b>Comment:</b> What not invoke the precautionary principle and err on the side of caution since the science says 3-6 feet.	
17	Pg. 106, pp 2	Coral reefs may be able to grow higher to adapt to rising sea levels, provided they are not impaired by impacts from bleaching, excessive sedimentation, and other factors.	<b>Correction:</b> This statement is fairly inaccurate as a coral reef is composed of calcium carbonate (sensitive to ocean acidification), built on layers of coral skeletons. It is generally slow growing, some species less than 2 mm per year. It is also light sensitive with sea level rise and other factors potentially impairing growth. Amongst habitat types, coral reefs are considered the most sensitive to climate impacts. <b>Recommendation:</b> Correct or remove statement.	
18	Pg. 107, Permitting Actions and Code Changes	1.a. Ensure the safety of individuals, families and communities within coastal hazard areas and communicate the dangers to residents and tourists;	1.a. <b>Suggested new language: Develop community-specific hazard response plans to ensure the safety of individuals, families and communities within coastal hazard areas. Develop communication tools that communicate the dangers to residents and tourists;</b>	
19	Pg. 107, Permitting Actions and Code Changes	1.b. Discourage development or redevelopment (including tourist uses) within hazardous areas, while preserving adequate space for expected future growth in areas located outside these areas;	1.b. <b>Suggested new language: For entitlement properties, create incentives for redirecting development or redevelopment (including tourist uses) while preserving adequate space for expected future growth in areas located outside these areas;</b>	
20	Pg. 108, Objective	Objective: To protect the flora and fauna unique to Kaua'i and Hawai'i and to mitigate the impact of invasive species.	<b>Suggested new language:</b> Objective: To protect the flora and fauna unique to Kaua'i and Hawai'i <b>by eradicating or controlling the spread of existing invasive species and preventing the introduction of new invasive species.</b>	
21	Pg. 108, Partnership Needs	2. 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.	<b>Please give examples</b> of "local financing plans".	

22	Pg. 108, Partnership Needs	3. Adopt tax policies favorable to public shoreline access.	<b>Please give examples</b> – does this mean develop a revenue stream to purchase public access (aka open space model), or provide landowners with tax incentives? What’s confusing is that public shoreline access is already a public right.	
23	Pg. 108, Partnership Needs	5. Dissuade against beach driving through enforcement and educating drivers about the laws, safety, and environmental and cultural impacts of driving on beaches.	<b>5. Suggested new language: Increase compliance with beach driving prohibitions</b> through enforcement and educating drivers about the laws, safety, and environmental and cultural impacts of driving on beaches.	Language needed strengthening.
24	Pg. 109, Permitting Actions and Code Changes	4. Encourage new development to implement voluntary actions to encourage a net gain in protection efforts of our threatened and endangered species.	<b>4. Suggested new language: Require new development projects to develop and implement a plan that supports</b> a net gain in protection efforts of threatened and endangered species (as required under the Endangered Species Act).	Needs to be more force behind this or it won’t happen.
25	Pg. 109, Permitting Actions and Code Changes	5. Minimize risks to threatened and endangered species in construction and development activity.	<b>5. Suggested new language: Develop and implement a plan that reduces and mitigates risks</b> to threatened and endangered species in construction and development activity.	Needs to be more force behind this or it won’t happen. 4 and 5 could actually be combined into one plan.
26	Pg. 110, Partnership Needs	For all points 1-13.	Needs to be more clarity on how the County is going to partner and with whom.	

**OVERALL ASSESSMENT: The Watershed**

The narrative in this section has vastly improved and addresses most of the key geographical/biogeographical areas and associated issues. What is missing from the narrative is the importance of the integral relationship between land and water in a watershed and the fact that would be better understood and managed as such by using a holistic ahupua’a management approach. This is a real deficit in this sector and a missed opportunity to bring a cultural context and framework to the management side of the watershed.

There are five broad-based recommendations for this sector:

- It is essential to consider the value of fully reintroducing an ahupua’a management framework, along with western science, to address management challenges in the 21<sup>st</sup> century by calling on the most intimate, historic and place-based knowledge base we have available to

us – the ahupua’a system. Without this framework, the potential of this sector is woefully and inadequately addressed.

- This sector’s narrative and actions are negligent in regards to the discussion on water and public trust doctrine rights, and the associated responsibility of the County to conserve and determine allocation use of these resources in relationship to the public trust.
- The connection of this sector to the “Future Land Use” section of the General Plan is underplayed, particularly in regards to changes in zoning classifications and future residential and commercial development and the impacts on both land and water (the entirety of the watershed). The 3,000 visitor unit entitlement resorts, plus Hokua Place and Lima Ola are just an example of the future impacts on water and land resources that have not been accounted for.
- As indicated in the table above, some of actions are too generalized and need further articulation in order to fully understand the intent of the action. This would include giving examples of specific activities to better illustrate what the Planning Dept. has in mind. Also, in particular, the “Partnership” section needs to be much clearer in terms of whom the potential partners might be. Without this information, the actions read like a wish list.
- Overall, it appears there are more actions than can be reasonably implemented, calling for the need for prioritization of actions and the potential for some weeding out.

LOCATION		TEXT/INFORMATION	PROPOSED CHANGE(S)	RATIONALE
<b>SECTOR: Housing</b>				
1	Pg. 113, pp2, sentence 2	Since 2000, Kaua’i’s population increased by over 10,000 and yet only 5,000 units were added to the housing inventory between 2000-2014. Given there is a current deficit of 1,400 housing units, meeting the projected demand of approximately 9,000 homes by 2035 will be challenging (see Figure 3-5).	<b>Recommendation:</b> Since there is an average of 2.69 people per household on Kaua’i (not commenting on whether this is optimal), then as of 2014 there should be more housing units available than the growth that occurred between 2000-2014. If this is the case, then there should not be a deficit of 1,400 units. In projected the housing unit needs into the future, the average number of people per household unit should also be considered.	
2	Pg. 114, Objective	Objective: To increase housing opportunities for low to moderate income households.	<b>Suggested new language:</b> Objective: To support the development and implementation of a range of public and/or private housing opportunities and configurations that meets the projected needs of the current population of low to moderate income households.	
3	Pg. 114, pp2, sentence 4	It is estimated that the combined housing and transportation costs consume more than 60 percent of Kaua’i’s average household income. In fact, Transportation	<b>Comment:</b> Without placing a value judgment here, it might be important to understand some of the choices made that drive up transportation costs by individuals including the choice of vehicles, the number of single	

		costs outweigh housing costs.	occupant cars, driving habits that drive-up insurance costs; as well as limited options for public transportation and ride sharing. To then roll that into cost of living numbers gives a somewhat skewed picture and doesn't help us to necessarily address the housing crisis.	
4	Pg. 114, pp3, sentence 2	Many factors are out of government control, such as off island demand and high land and construction costs.	<b>Recommendation:</b> Off island demand can be addressed through disincentives. Higher property taxes for non-residents is an example that is already in place, but also cost of or access to services can be used as disincentives in the same way. We should not say that it is out of the control of government to do something about it.	
5	Pg. 115, Permitting Actions and Code Changes	1. Increase the supply of affordable rental and multi-family housing by implementing the Housing Ordinance.	<b>Inconsistency:</b> The assumption is the this ordinance is the one alluded to on pr. 114, section 1.1) in which the GP states: "Many developers express concern that such mandates delay development and housing inventory growth, thus compounding the problem they are met to solve. At the same time, the community does not support removing such requirements altogether. A more balanced approach is required and carefully crafted amendments to existing laws must be implemented if the desired result is production of affordable housing by the private sector. " Given this statement, the action in the column to the left is not tracking the narrative.	
6	Pg. 115, Permitting Actions and Code Changes	3. Support economically integrated communities by requiring affordable housing mandates to be met on site.	3. <b>Suggested new language:</b> Enforce and do not make exception to the affordable housing mandate of requiring that economically integrated communities be met on site prior to any land use zoning changes or permits are approved.	Language needs to be strengthened if it is going to carry the force of the law.
7	Pg. 115, Permitting Actions and	5. Preserve affordable housing stock.	5. <b>Suggested new language:</b> Preserve affordable housing stock by putting controls such as caps on the % of increase in the resale price of affordable housing.	Examples show some than thought beyond an action

	Code Changes			just being a concept.
8	Pg. 115, Projects and Programs	1. Complete the Lima Ola affordable housing project.	<b>Recommendation:</b> Considering the public controversy around this development, along with Hokua Place, these two developments don't really belong in a General Plan, but rather should be considered as separate specific proposals and given the public input and scrutiny by the Planning Commission and County Council that is required of these kinds of large and impactful projects.	
9	Pg. 116, Objective	Objective: To support mixed use, higher density, and walkable development in existing towns.	<b>Suggested new language:</b> Objective: <b>In accordance with Community Plans and their associated Future Land Use Maps</b> , support mixed use, higher density, and walkable development in existing towns.	This objective and the one below should ne merged.
10	Pg. 117, Objective	Objective: To develop compact, walkable communities consistent with the Future Land Use Map.	<b>Suggested new language:</b> Objective: <b>In accordance with Community Plans and their associated Future Land Use Maps</b> , develop compact, walkable communities.	This objective and the one above should be merged.
11	Pg. 118, Objective	Objective: To expand housing opportunities for workers on farms.	<b>Suggested new language:</b> Objective: To provide the needed permitting actions and code changes necessary to support agricultural worker housing and the viability and potential of small scale agricultural enterprises.	Note: the narrative on this section is not well elaborated on (2 sentences) considering the public input on this area.
12	Pg. 118, Permitting Actions and Code Changes	8. Allow higher density to increase profitability for developers, resulting in cheaper housing per unit cost.	<b>Recommendation:</b> Considering this is under the "New Communities" section of the Housing sector and not under "Affordable Housing", it is not the responsibility of the County to ensure profitability for developers, particularly with growth management such a big issue on Kaua'i. This maybe a way to control growth in the higher cost housing sector. <b>Please remove this action.</b>	
13	Pg. 118, Permitting	10. Require non-entitled new communities in this General Plan to attain full State and	<b>Comment:</b> There should be no assumption that non-entitled new communities will necessarily receive the	

	Actions and Code Changes	County district and zoning approvals by 2027. Require short-duration expiration dates should development not be constructed as permitted, unless stated otherwise.	full State and County district and zoning approvals, and in fact NOT allowing any new zoning approval (especially until other issues like traffic and infrastructure are adequately addressed) would be consistent with the GP's need to control growth, preserve the rural character of Kaua'i and prevent further loss of agricultural lands (all explicitly stated as priorities in the GP). <b>Correction:</b> there is an extra "and" in the first part of this paragraph.	
14	Pg. 118, Partnership Needs	2. Enter into public/private partnerships to move forward development in new communities, especially Lihu'e, South Kaua'i, and Kilauea.	<b>Recommendation:</b> This should not be an action in the General Plan if there is any intention of managing growth, preserving the rural character of Kaua'i and prevent further loss of agricultural lands (all explicitly stated as priorities in the GP).	
15	Pg. 119, Permitting Actions and Code Changes	1. Support the development of a limited amount of housing on agricultural land for farm workers and their families by:	1. <b>Suggested new language:</b> Create the opportunity for the development of a range of housing options on agricultural land for farm workers and their families by as needed to support the development of agriculture as a viable source of income generation for small farm operations:	
16	Pg. 120, Permitting Actions and Code Changes	2. Integrate universal design standards into Kaua'i's building code.	2. <b>Suggested new language:</b> Integrate universal <b>senior living</b> design standards into Kaua'i's building code.	
17	Pg. 121, Plans and Studies	1. Integrate kupuna needs into all future planning efforts.	<b>Recommendation:</b> Please clarify what this means by giving some examples.	
18	Pg. 121, Partnership Needs	1. Provide and anticipate increasing services to the elderly and their caregivers, including access to transit, nutrition services, fitness programs, and personal care.	1. <b>Correction: Anticipate and provide</b> increasing services to the elderly and their caregivers, including <b>access</b> to transit, nutrition services, fitness programs, and personal care. <b>Recommendation:</b> Please identify who the partners might be for this action.	

19	Pg. 121, Plans and Studies	1. Support the implementation and update of the <i>Kaua'i Houseless Solutions Summit Plan</i> .	<b>Recommendation:</b> The GP should extract from this study which specific components would fall under "Partnership Needs" and which would fall under "Projects and Programs" in the GP.	
20	Pg. 122, Objective	Objective: The reduce the impact of resort uses on communities outside the Visitor Destination Area	<b>Suggested new language:</b> Objective: Enforce all non-conforming TVRs in order to address the negative impacts on residential neighborhoods.	

**OVERALL ASSESSMENT: Housing**

There are some areas that could have warranted further discussion in this sector, especially considering the complexity and brevity of this issue to quality of life. These areas include:

- Any actions in this sector that are associated with Future Land Use (changes) or Community Designations should be deferred to the Community Plans and reflect the needs and interests of those respective communities.
- More in-depth discussion and solution on affordable housing rental market, which in many ways is of greater need than affordable housing to purchase.
- More in-depth discussion on the impact TVAs are having on the rental market.
- More in-depth discussion on how to maintain the existing inventory of affordable housing, both now and in the future.
- Discussion needed on how supporting the development of DHHL lands could contribute to the affordable housing inventory.
- Discussion needed on the root cause of the houselessness situation (both internal and external).
- There is a need to more explicitly examine and suggest options for creative and low construction cost affordable housing such as the cluster model (Whidbey Island), and other models of practice around the world, so that we move beyond just the concept of location near jobs, density and reducing transportation costs (which are all an important part of the mix).

	LOCATION	TEXT/INFORMATION	PROPOSED CHANGE(S)	RATIONALE
<b>SECTOR: Transportation</b>				
1	Pg. 125, Objective	Objective: To safely and efficiently move people and goods with a choice of transportation options.	<b>Suggested new language:</b> Objective: To safely and efficiently move <b>residents, tourists and goods by providing a range of transportation options that reduce single occupant vehicle use by XX% by 2035, and consequently reduce points of congestion and enhance the flow of traffic around the island.</b>	
2	Pg. 125, section 1.1, pp.5, bullet 2	When new roads are planned and constructed, focus on enhancing roadway network and connectivity, and <b>improving</b>	<b>Clarification:</b> What does improving resiliency mean?	

		<b>resiliency;</b>		
3	Pg.126, Projects and Programs	a. Add one lane on the Kuhio Highway from the southern end of the Kapa'a Bypass Road to Kuamo'o Road.	<b>Clarification:</b> What is the practicality of this in regards to the fact that the road cannot be expanded makai because of the potential for sea level rise and the newly completed bike path land; it cannot be expanded mauka without going right through Coco Palms. Also, Kuamo'o experiences its own back-ups during key commuter times and this approach seems like it will only further contribute to this congestion.	This is a perfect example of the complexity of the traffic issue and how one action in the GP can seemingly solve one problem, while contributing to another.
4	Pg. 126, Partnership Needs	1. 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 20% for bicycle trips.	<b>Clarification:</b> What is the basis or rationale for these numbers. <b>Comment:</b> This does not seem very ambitious in terms of addressing traffic congestion and getting cars off of the road.	
5	Pg. 127, County Roads section, Objective	Objective: To provide a safe and accessible County road network that supports the Future Land Use Map.	<b>Comment:</b> This objective is followed by: 2.1 Preserving or Island's Character and Advancing Opportunity. This exemplifies the on-going contradiction in this plan in regards to paying lip service to "preserving the islands character" and at the same time allowing for development that takes away that character, while creating a network of roads to support development. What is it were trying to do here?	
6	Pg. 128, Projects and Programs	3. Implement maintenance of roadside vegetation and road surfaces to increase safety.	<b>3. Suggested new language: Implement, make use of and maintain roadside vegetation to increase safety and serve as a road runoff filtration system. Maintain road surfaces to increase safety.</b>	
7	Pg. 128, Partnership Needs	1. Improve systems, communications, and resources so that County projects funded by the State Transportation Improvement Program (STIP) are completed on schedule.	<b>Question:</b> What are "systems" that are stated need improvement. And, is the problem about projects not being completed on schedule the responsibility of the State or County. It sounds like the State is preventing the County from finishing projects on time.	
8	Pg. 128,	2. Secure resources and partnerships for	<b>Question:</b> Is this referring the "Adopt-a-Highway"	



	Partnership Needs	maintenance of County roadways.	program or something else. Either way, please clearly state here what you mean and evaluate the likeliness of it happening.	
9	Pg. 128, Transit Program, Objective	Objective: To enhance the viability of transit as a transportation choice for residents and visitors.	<b>Suggested new language:</b> Objective: <b>To increase the viability and expand public transportation ridership by residents and visitors by XX% by 2035.</b>	There needs to be a clear target for what is to be achieved by 2035.
10	Pg. 128, 3.1 Expanding Transit Ridership	Need to add a third bullet point.	<b>Add:</b> 3. Increase availability of information to riders on bus schedules and routes; and provide up-to-date, real time information at bus stops on actual bus arrival times. (same language should be reflected in: C. Projects and Programs, #5)	
11	Pg. 133, Plans and Studies	1. Establish an islandwide bikeways plan with priorities for implementation through the Community Planning process.	1. <b>Suggested new language:</b> Establish an islandwide bikeways and <b>walking plan with priorities for design, location and implementation held in conjunction with</b> Community Planning process. Note: also cross-reference with Pedestrian Program, pg. 130)	
12	Pg. 134, Partnership Needs	Comment applies to all 4 action items.	<b>Recommendation:</b> Please be clear who these partnerships might be with whether it is other divisions within the County or private sector.	

**OVERALL ASSESSMENT: Transportation**

1. In general, there is not a single, cohesive direction for what is to be achieved in this sector. Do we want to change the pattern on single occupant vehicle use? Do we want to reduce the number of cars on the road? Do we want to reduce greenhouse gas emissions? The answer is clearly “no” on GHG emissions as it was not even mentioned. It is hard to get a reading on what we are trying to accomplish other than the fact everyone is pissed off about traffic jams, yet there is an enormous opportunity right now to take advantage of this irritation and turn Kaua’i into a multi-modal transportation model.

2. The impact of tourist rental cars has barely been addressed in this section. Here are some examples from other (mostly) island states and nations on how they address tourism impacts on traffic (extracted from research provided by Janos Samu):

- controls on the use or number of rental cars (Bermuda is an example that allows not rental cars except the use of the all-electric Twizy at \$85 per day)
- increase registration tax on cars and annual license fee (Hong Kong study recommends increase registration by 15% and annual license fee by 80%)
- increase parking meter costs and penalties for illegal parking, reduce number of legal parking spaces (Hong Kong model)
- ban the use of rental cars by tourists (Balearic Islands, Spain)

- use electronic signs on key roads to post real time information on how long it will take to get to key destinations (Usedom Island, Germany found this keep gets people/tourists to re-evaluate whether they want to pick another time to travel)
  - cap the number of beds for visitors to control numbers of cars on the road (Ibiza, Majorca, Cinque Terre (Italy))
3. Editorial comment: changed terminology, particularly in the beginning of this section from "road" to "street". Should use only one terms or define the difference between the two terms.

LOCATION	TEXT/INFORMATION	PROPOSED CHANGE(S)	RATIONALE	
<b>SECTOR: Critical Infrastructure</b>				
1	Pg. 136, improving How Infrastructure Supports New Growth, pp1	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.	<p><b>Comment:</b> Until we get clear about how we are going to approach growth, how can a statement be made like this? Unless the developer is contributing to specific needs of residents, such as building affordable housing, then they should bear the cost burden of infrastructure development, particularly since they alone will be gaining the financial benefits from development.</p> <p><b>Recommendation:</b> Remove this statement until there is a clear path forward on how growth is going to be addressed.</p>	
2	Pg. 136, 1. Domestic Water, pp1	Kaua'i is endowed with ample water supply in our aquifers, but water distribution is limited by a system that requires expansion to meet projected demands through 2035.	<p><b>Comment:</b> This does not seem to address, nor is there anywhere in the GP that addresses, the potential for water shortages due to climate change (drop in precipitation levels, as we are already seeing) combined with increased demand. On an island with no other source of fresh water, this should always be of particular concern.</p>	

			<b>Recommendation:</b> Take the precautionary approach and change the language so that it is clear that “ample” reflects the current state.	
3	Pg. 136, Domestic Water Objective	Objective: To ensure water infrastructure is planned to accommodate domestic needs and protect the public trust.	<b>Suggested new language:</b> Objective: To ensure water infrastructure is planned for <b>equitable distribution</b> to accommodate <b>current and future</b> domestic needs and protect the public trust.	
4	Pg. 136, 2. Reconciling Water Supply and Infrastructure	Kaua’i’s aquifers have sufficient sustainable yields to accommodate future growth. The State Commission on Water Resource Management (CWRM) has not imposed any Ground Water Management Areas on Kaua’i, which would be required if there were dangers of exceeding sustainable yields in any of our aquifers. The CWRM is expected to issue an updated Water Resource Protection Plan that will have new sustainable yield estimates based on a more cautious approach than previous estimates.	<b>Recommendation:</b> Before making a statement like this (which sounds like it is providing justification for development), maybe we should wait for this new estimate to be issued: “The CWRM is expected to issue an updated Water Resource Protection Plan that will have new sustainable yield estimates based on a more cautious approach than previous estimates. “	
5	Pg. 137, pp2, sentence 1	Based on future projections, the DOW will need to complete system and facility improvements to address an additional 6.48 mgd of production and supporting facilities by 2035	<b>Comment:</b> If the projections for visitor use alone are not based on good data, then how accurate can a statement like this be? This is the example of the need for accurate data and sound projection models.	
6	Pg. 137, pp3, sentence 4	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.	<b>Comment:</b> This statement has profound implications and needs to be highlighted upfront. <b>Recommendation:</b> Move this paragraph to the beginning of the section on water and use the following language: Before water and associated facilities for extraction, storage, and distribution can be allocated to support growth, the legal challenges questioning the validity of water resource diversion in relation to the public trust doctrine must be answered.	

7	Pg. 137, pp4	The DOW <i>Water Plan 2020</i> incorporated housing unit and population forecasts from the 2000 <i>Kaua'i General Plan</i> . The DOW will update its <i>Water Plan 2020</i> to a 2040 planning horizon after this General Plan is complete, incorporating updated housing unit and population forecasts.	<b>Comment:</b> In reference to #5 above this is a case in point as this why we need to hold off on the projections until we have current data to support the recommendation.	
8	Pg. 137, 1.3 Enhancing Water Conservation	While there is little concern that we will exhaust the water supply in our aquifers, minimizing water demands will conserve existing system capacity and reduce or forestall the need to expand costly water extraction, storage, and transmission/distribution infrastructure.	<b>Comment:</b> While to conservation component of this is a positive, to say "While there is little concern that we will exhaust the water supply in our aquifers. . . ." is very short sighted. <b>Recommendation:</b> remove ""While there is little concern that we will exhaust the water supply in our aquifers. . . ."	
9	Pg. 138, Partnership Needs		<b>Recommended addition:</b> 3. Work with the Kaua'i Visitors Bureau, and major hotels and resorts on the island, to educate and reduce water usage by visitors.	Tourist consumption of water resources, as well as that of resorts, does not seem to be accounted for in this plan. There is extensive literature on the fact that tourists tend to use significantly greater amounts of water when on vacation then they do at home.
10	Pg. 138, Objective	Objective: To mitigate impact to Kaua'i fresh and ocean waters from wastewater.	<b>Suggested new language:</b> Objective: Manage wastewater to ensure Kauai is maintaining compliance with Hawaii DoH Water Quality Standards and the Clean Water Act in all fresh and ocean waters.	
11	Pg. 139,	While total wastewater treatment capacity	<b>Comment:</b> Without somewhat accurate projections on	

	section 2.1, pp5, sentence 1	was sufficient to address the levels of wastewater generated in 2015, projected growth indicates the need to expand wastewater treatment facilities by a little over 2.5 mgd to accommodate island wide generation in 2035.	visitor numbers, how can we now this % of growth for wastewater treatment facilities is sufficient?	
12	Pg. 140, Permitting Actions and Codes	3. Improve the quality of effluent discharged into injection wells, especially those in the Special Management Areas.	3. <b>Suggested new language:</b> Improve the quality of effluent discharged into injection wells, in particular those currently in the Special Management Areas. Future placement of injection wells will not be permitted in Special Management Areas.	Injection wells are known for leakage, impacting fresh water sources and nearshore waters.
13	Pg. 141, Partnership Needs	2. Institute best practices for diverting and reusing wastewater.	<b>Recommendation:</b> Please state potential partner(s) and give examples of best practices.	
14	Pg. 141, Objective	Objective: To provide environmentally-sound waste disposal and collection services.	<b>Suggested new language:</b> Objective: By 2035 create a net reduction in island-wide solid waste disposal volume by XX% through the use of environmentally sound waste management practices. <u>OR</u> By 2023 ensure a 70% diversion of solid waste away from land fills by using environmentally sound waste management practices.	Note that the second recommendation mirrors language in the GP.
15	Pg. 143, pp3	The Hawai'i Deposit Beverage Container (DBC) law was implemented in 2005 and covers water and other beverages packaged in aluminum, bi-metal, glass, and certain plastics. This provides an economic incentive to recycle and has significantly increased the diversion of these containers. The current recycling rate is 68 percent.	<b>Recommendation:</b> To recognize the need for a readily available mechanism in place for recycling cans and bottles and recovering the deposit. Many large grocery store chains on the mainland have automated systems which by design ease incentive recycling.	The real incentive is in the ability to realize a \$ return on recyclables. This also becomes a direct source of income for those with supplemental income needs.
16	Pg. 144, Projects and Programs	5. Maximize effective life of existing and future land fill capacity.	5. <b>Suggested new language:</b> Maximize effective life of existing and future landfill capacity through the diversion of green and recyclable waste using environmentally sound waste management practices.	

17	Pg. 144, Projects and Programs	6. Increase the convenience of recycling centers for users.	<b>6. Suggested new language:</b> Increase the convenience of recycling and <b>recyclable and redemption centers</b> for users.	
18	Pg. 144, Objective	Objective: To support the modernization and user-friendliness of Kaua'i's airports and harbors.	<b>Suggested new language:</b> Objective: To improve the utilitarian value of Kaua'i's airports and harbors.	Most people who have spoken up about the renovation of the airport think it is a waste of federal/state resources and only serves to increase tourism and not the residents of Kaua'i.
19	Pg. 144, section 4.1, pp1, sentence 2	HDOT is undertaking a statewide Airports Modernization Program. In Līhu'e, improvements include upgrades to the ticket lobby, construction of a consolidated car rental facility, and an expansion of the parking area and airport loop road.	Comment: If we truly had a clear vision and framework in this plan for how we want to address growth management, then we would reconsider whether this "Modernization Program" supports the direction we want to move in. Seems like it is only encouraging further tourism development, exacerbating the current problems.	See comment above.
20	Pg. 144, section 4.1, pp1, sentence 4	While improvements to airports are justified to serve existing and projected demand, there is concern that increasing the capacity of Līhu'e Airport would support and encourage increased visitor traffic. Such improvements should be balanced with the objectives of managing tourism impacts and keeping visitor arrivals at reasonable levels.	<b>Comment:</b> "Such improvements should be balanced with the objectives of managing tourism impacts and keeping visitor arrivals at reasonable levels. " This is a great concept, but we don't seem to have truly binding objectives in regards to managing tourism numbers and impacts.	
21	Pg. 145, pp3	Nāwiliwili Harbor should be able to accommodate demand for overseas and inter-island shipments through 2025, but beyond that, expansion may be needed. A State-owned area adjacent to the existing	<b>Comment:</b> How to we truly understand what this demand is if we don't have somewhat realistic projections on visitors, who are adding to that demand for shipments of goods.	

		terminal was identified for possible expansion of the overseas terminal in the CHMP. Inter-island terminal needs may also be met by harbor reconfiguration or additional land acquisition.		
22	Pg. 145, Partnership Needs	2. Update the Līhu'e Airport Master Plan and address capacity issues. 3. Collaborate with HDOT Airports Division in the implementation of the TAM.	<b>Comment:</b> Both of these actions will be difficult without accurate visitor projections.	

**OVERALL ASSESSMENT: Critical Infrastructure**

In general, this section largely deals with poor planning in the past and/or the inability to maintain and keep current Kaua'i's critical infrastructure. As such, the General Plan does not really provide innovative and proactive measures to guide us towards a more deliberate future.

Specific areas of concern:

- Without a clear growth management model in the General Plan, it is extremely difficult to project out what kind of infrastructure (aka development) needs we want to support into the future. Do we want a “build it and they will come” model; or “let’s maintain the rural character and quality of life” model that so many community members expressed during the GP process? We need this clear guidance and not the contradictory messages we are getting throughout this plan (maintain quality of life/rural setting vs rampant development) if we are going to understand how best to address our current and future infrastructure needs.
- Secondly, without good data and growth projections, particularly for tourism numbers, how can the GP estimate future infrastructure needs – from water to waste management to airport infrastructure? This is basic and necessary for good planning and has significant implications in regards to access to and availability of water, solid waste management, airport redevelopment, etc., etc.
- The connection of this sector to the “Future Land Use” section of the General Plan is underplayed, particularly in regards to changes in zoning classifications and future residential and commercial development and the impacts on infrastructure. The 3,000 visitor unit entitlement resorts, plus Hokua Place and Lima Ola are just an example of the future impacts on infrastructure that have not been accounted for.
- This sector’s narrative and actions are negligent in regards to the discussion on water and public trust doctrine rights, and the associated responsibility of the County to conserve and determine allocation use of these resources in relationship to the public trust.

	LOCATION	TEXT/INFORMATION	PROPOSED CHANGE(S)	RATIONALE
<b>SECTOR: Economy, Sub-section: Tourism</b>				
1	Pg. 156, Revitalizing Existing Visitor	Over the last two decades, a substantial number of jobs have been generated within the visitor industry (arts, entertainment, recreation, accommodations, and food	<b>Comment:</b> “Therefore, new resort growth and infrastructure should be focused in the VDA. “ is a confusing conclusion from the statement leading into this. It seems the logical conclusion would be the need	

	Destination Areas	services). However, visitor growth also strains public facilities, infrastructure, and public services. Therefore, new resort growth and infrastructure should be focused in the VDA.	for more diversification in income generation opportunities, not further growth in the VDA.	
2	Pg. 157, pp1, sentence 3	The policy of the General Plan is to uphold Kaua'i as a unique visitor destination by focusing on revitalization and limiting new resort designations.	Comment: While this approach is important, as part of the opening paragraph on tourism, there should be a more comprehensive approach to tourism management if we are going to remain "a unique visitor destination".	
3	Pg. 157, Objective	Objective: To focus new resort development in areas designated for visitor use.	<b>Suggested new language:</b> Objective: To put a moratorium on visitor unit inventory expansion until we have addressed the issue of carrying capacity and corresponding impacts on infrastructure, traffic and basic quality of life factors for residents and visitor experience.	With the backlog of entitlement projects, including 3,000-3,700 additional visitor units, the County should not be focusing on resort development in or outside of visitor use areas.
4	Pg. 157, pp3, sentence 4	ADVC has been slowly growing at an average rate of about 2% per year since 2000, with a slight dip due to the economic recession of 2008-2009 (Figure 3-9).	<b>Correction:</b> Since 2010, the Average Daily Visitor Census (ADVC) has grown at a rate of 4.0% per year. If growth were to continue at that rate, by 2035, the ADVC would increase by 112% to 52,600. (2010 ADVC = 19,548 (General Plan, Figure 3-9). 2016 ADVC = 24,797 (General Plan, Table 3-3). This is 26.9% over 6 years, a compounded annual growth rate of 4.0%.)	This miscalculated projection as significant implications for all of the sectors and the net result in terms of error should not be underestimated.
5	Pg. 158, section 3, pp1, sentence 2	Taking shuttles to popular destinations instead of driving private cars is one example. Fortunately, Kaua'i has a high percentage of repeat visitors – as much as	<b>Recommendation:</b> If this is going to happen, there needs to be a disincentive program behind it, for instance, limit the numbers of rental cars and increase daily rates, put a carbon tax on rental cars, control	



		70 percent, according to the KTSP. Learning about and accepting different ways of accessing Kaua'i's attractions should be easier for experienced visitors, who might also appreciate such efforts to preserve the environment and culture	access to certain sites by only allowing public transportation, etc.	
6	Pgs 158-159, last and first sentence	Given that impacts disproportionately affect certain areas of the island, particularly the North Shore and South Kaua'i districts, shuttle efforts, parking improvements, and other solutions should be focused there.	<b>Recommendation:</b> "parking improvements" for popular tourist areas is not a solution if you want to manage tourism impacts. Coordinated and linked public transportation and other multi-modal options, such as foot and bike paths, would better serve everyone.	
7	Pg. 159, pp2, sentence 2	Merging these common sets of values between visitors and residents can sustain a strong tourism sector that has a light footprint on Kaua'i's environment and meshes well with local culture and lifestyles. Effectively doing this requires managing future growth in the visitor industry so it does not exceed the recognized carrying capacity of Kaua'i's resources and infrastructure. In addition, it requires improved transit options, better management of parks and beaches, and enhanced interactions with people involved in the visitor industry as well as other Kaua'i residents. The ultimate goal is to balance the visitor industry with natural and cultural preservation, the protection of community fabric, and the overall quality of life for residents.	<b>Comment:</b> This plan, although paying a lot of lip service to carrying capacity, does not even begin to approach it in the actions. It should also be noted, that even though the term "carrying capacity" appears in various places throughout this plan, that model alone is considered a dated management approach without a corresponding monitoring program that establishes "limits of acceptable change". In order to actually achieve stated goals, both models are necessary.	
8	Pg. 160,	4. Allow existing resort entitlements to	<b>Suggested new language:</b> Establish a moratorium on	

	Permitting Actions and Code Changes	build out and require any non-entitled resort-designated areas in this General Plan to attain full State and County zoning resort-related approvals by the year 2027, or within ten years of Community Plan approval if an area is conditionally designated.	any non-entitled resort designated areas until at least 2027 when the existing resort entitlements are fully built out and impacts on infrastructure, traffic and other quality of life factors for residents are fully realized and understood.	
9	Pg. 160, Plans and Studies	2. Explore development of a maximum annual visitor carrying capacity.	<b>Comment:</b> This plan, although paying a lot of lip service to carrying capacity, does not even begin to approach it in the actions. It should also be noted, that even though the term "carrying capacity" appears in various places throughout this plan, that model alone is considered a dated management approach without a corresponding monitoring program that establishes "limits of acceptable change". In order to actually achieve stated goals, both models are necessary.	
10	Pg. 160, Projects and Programs	1. Improve route and destination signage to alleviate congestion associated with difficulties in finding desired locations.	<b>Recommendation:</b> Tourists seem to have no problem finding even the most remote and removed sites. If you want to put in signage, electronic, real-time signage that reveals how long it will take to get to a destination at any specific time would be more useful and possibly discourage them from getting on the road during periods of high congestion.	Really? Given the enormous impact and cross-sectoral impacts of tourism, this is the best project or program the County can come up with?
11	Pg. 160, Projects and Programs	3. Support projects to encourage visitor transportation mode shift from single occupancy vehicles to other modes.	<b>Recommendation:</b> If this is going to happen, there needs to be a disincentive program behind it, for instance, limit the numbers of rental cars and increase daily rates, put a carbon tax on rental cars, control access to certain sites by only allowing public transportation, etc.	
12	Pg. 160, Partnership Needs	2. Develop alternative transportation options for visitors, including shuttles and car sharing, to reduce visitor impact on our	<b>Recommendation:</b> If this is going to happen, there needs to be a disincentive program behind it, for instance, limit the numbers of rental cars and increase	

		roads, highways, and scenic places.	daily rates, put a carbon tax on rental cars, control access to certain sites by only allowing public transportation, etc.	
13	Pg. 160, Partnership Needs	8. Attract new employees, especially local residents, to the visitor industry to ensure an available, well- qualified workforce.	<b>Recommendation:</b> Eliminate this action and let the industry take responsibility for it.	
14	Pg. 160, Partnership Needs	11. Increase use of renewable fuel sources and support carbon offset programs and incentives for passengers traveling to and from Kaua'i.	<b>Recommendation:</b> If you really want to do this then you are going to have to reduce the number of mainland flights, and the best way to do that is to control the number of visitor units and rental cars.	

**OVERALL ASSESSMENT: Economy, Sub-section: Tourism**

Given the numbers of visitors and corresponding impacts on all sectors in this General Plan, if this sector was adequately dealt with it alone could have a huge corrective impact on all the other sectors. However, the visitor numbers and impact side of this sector was barely broached by the actions in the General Plan.

Additionally, the following corrections adjustments and omissions are necessary if this Plan is going to have any impact whatsoever:

- The visitor number projections are based on relic and now irrelevant data (see comments above), with a net result of grossly underestimating impacts on all the other sectors
- Carrying capacity is a nice notion, but does not work without the "limits of acceptable change" model which is now widely used in tourism dependent areas around the world. (I have a folder with over 20 case studies)
- In general, given the brevity of this issue, the collective actions in the General Plan don't even begin to touch on the issues. Hoping for behavior change does not happen, especially when it is not in your own back yard. There is a need for a comprehensive incentive/disincentive plan if we are going to begin to address the numbers and impact areas.
- Please also note Carl Imperato's comprehensive analysis on the numbers.

Worldwide, there are some excellent sustainable tourism models that have been executed by island states and nations and could easily be adapted to Kaua'i. A small sampling of the kinds of actions taken include:

**Use limits to control over-crowding:**

- limit number of day users, limit number of parking spaces, limit on bus numbers, limit numbers of recreational uses (e.g., number of kayaks, SUPs, etc.)

**Group size limits:**

- limit number of people in any given area within a time period

- limit numbers of arrivals

Area control:

- require permit before entry into certain areas
- temporarily close off areas that are highly impacted
- close off areas to certain usages

Length of stay limits:

- number of day stays limited

Trip scheduling:

- boat, bus, kayak or other tours have staggered launch times

Differential pricing:

- higher use fees during peak times
- differential fees according to location

differential fees for residents (free) vs tourists

**Transportation Management:**

- regulations governing numbers of road vehicles
- requiring the use of public transport to reach certain attractions/ areas of interest
- automatic fee for use of public transport, although actual use is optional integrated public transport systems and tours

**Accommodation Management and Other Modes for Limiting Visitors:** (extracted from research provided by Janos Samu)

- According to the new law in Iceland, a person can rent out their property for up to 90 days a year without needing an operation license from the state. At the same time, the gross income from renting out their property cannot exceed 1 million ISK. This effectively means that AirBnB operators cannot charge more than 11,111 ISK per night. At the same time, prospective renters need to register their property with the county seat every year, at a cost of 8,000 ISK. The property in question also needs to be an established residential property, and fulfill all necessary health and safety requirements as such. If a renter exceeds the 90 day limit, or if their earnings from it exceed 1 million ISK, the county seat may opt to de-register the property's permit to operate as an AirBnB. Fines for offenses can range from anywhere from 10,000 ISK up to 1 million ISK. (Iceland)
- The picturesque island of Santorini will as of 2017 implement a system controlling the number of visiting cruise passengers, with a set limit at 8,000 a day in efforts to ensure the best quality services, safeguard the environment and spread out the number of cruise ship calls throughout the week.
- A new Ibiza tourism law seeks to cap the number of beds available for international visitors to the White Isle. The legislation is in response to locals' claims that tourism numbers have impacted rental rates.
- In Majorca, local authorities have placed a cap on tourist beds at 623,624. With [The Times](#) reporting that this number will be reduced by an additional 120,000 in the coming years. Airbnb and HomeAway users are also affected by the ruling. The services will soon be further regulated by obligatory licenses. A fine of up to €400,000 may be payable if rules are broken.
- Cinque Terre, Italian officials have announced that they will be taking measures to protect the cliffside villages' delicate environments by

capping the number of people who are allowed to visit. The maximum number of travelers permitted to visit will now be 1.5 million per year—a number that may seem high, but is well below the 2.5 million who visited in 2015. Local politicians cited cruise ships, which drop off large numbers of people at once, as one of the biggest sources of tourists. Starting this summer, those 1.5 million visitors will have to buy tickets ahead of time.

- Sections of Dubrovnik, Croatia where too many tourists go have cameras with counters and if the permitted number of visitors is reached gates to the section will be closed for entrance.

LOCATION	TEXT/INFORMATION	PROPOSED CHANGE(S)	RATIONALE
<b>SECTOR: Economy, Sub-section: Agriculture</b>			
1	Pg. 162, Objective	Objective: To ensure the long-term viability and productivity of agricultural lands.	<b>Suggested new language:</b> Objective: To ensure the health of the land and water by maintaining our agricultural lands (no net loss) and increasing their productivity to contribute to a more food sustainable future for Kaua’l and function as a growing economic sector.
2	Pg. 162, pp3 &4	It is also a sector that supports Kaua’i’s vision of remaining a rural island, preserving open spaces, and producing more food and resources. The North Shore’s land ownership patterns are more fragmented and among the most desirable areas for high-end housing. This, coupled with regulations that permit agricultural condominiums, exerts development pressure on the North Shore’s agricultural lands.	<b>Comment:</b> These two paragraphs are in direct conflict with the decision to not revert Princeville-Phase II back to agricultural lands, which the community showed enormous support and there was no public opposition. <b>Recommendation:</b> Let the community decide through their Community Plan process what they want to recommend for Princeville-Phase II.
3	Pg. 163, pp1, sentence 3	The greatest share of Kaua’i’s 21,000 acres of cultivated crop lands are in commercial seed production (13,299 acres), . . . .	<b>Comment:</b> The jury is still out on whether these lands, with this activity taking place, can still be considered agricultural lands as opposed to research lands. <b>Recommendation:</b> Qualify this statement in the GP as indicated above.
4	Pg. 163, pp2, sentence 2	Concerns about pesticide use and the cultivation of genetically modified organisms (GMO) by seed companies and	<b>Comment and Recommendation:</b> “Nevertheless, these large agricultural operations provide substantial employment opportunities in rural areas of Kaua’i,

		other large agricultural producers have resulted in fact- finding inquiries, lawsuits, and proposed legislation regulating these activities. <b>Nevertheless, these large agricultural operations provide substantial employment opportunities in rural areas of Kaua’i, particularly Waimea and Kekaha.</b>	particularly Waimea and Kekaha.” This is a gross overstatement and should be removed from the GP.	
5	Pg. 163, section 2.3, pp2	An emerging issue is the permitting of water diversion from streams to feed agricultural ditch systems. Many diversions have operated for a long time under a revocable State permit. However, the State now requires that such diversions obtain a water lease. The water lease application process requires environmental and cultural studies, including analysis of in flow stream standards. This may result in stricter diversion limits, which will impact agricultural operations if stream flow decreases.	<b>Comment and Recommendation:</b> This section is missing the conversation on water rights that should be included in the narrative.	
6	Pg. 166, Permitting Actions and Codes	1. Ensure agriculture-designated lands are used for agriculture and related activities, including aquaculture, commercial forestry, and animal husbandry.	<b>Suggested new language:</b> 1. Ensure agriculture-designated lands are <b>maintained as such and</b> used for agriculture and related activities, including aquaculture, commercial forestry, and animal husbandry.	
7	Pg. 166, Permitting Actions and Codes	3. Control the subdivision and alteration of agriculturally-zoned land to prevent the dissipation of agricultural potential, the loss of rural character, and the conversion of land use to urban land use designations.	<b>Contradiction:</b> Then why is the GP recommending Hokua Place and Princeville II not be maintained as agricultural lands?	
8	Pg. 166,	8. Require preservation of viable irrigation	<b>Comment:</b> What does this mean in relationship to	

	Permitting Actions and Codes	systems – both government-owned and privately owned – to support the supply of irrigation water to farms.	diversions and water rights?	
9	Pg. 167, Partnership Needs	All actions in this section.	<b>Comment and Recommendation:</b> Needs to be some clarification on possible partners for all of these 11 actions.	

**OVERALL ASSESSMENT: Agriculture**

Although the narrative is overall quite good in this section, the singular most critical issue that needs to be addressed is the issue of water diversion and rights as a trust resource. Additionally, the narrative sets up contradictions with the Future Land Use section in regards to the conversion and loss of agricultural lands through re-zoning. There needs to be some reconciliation in the GP on both of these extremely significant issues.

	LOCATION	TEXT/INFORMATION	PROPOSED CHANGE(S)	RATIONALE
<b>SECTOR: Energy Sustainability, Sub-section: Reduction of Greenhouse Gas Emissions</b>				
1	Pg. 182, Objective	Objective: To acknowledge the human contribution to global warming and reduce Kaua’i’s greenhouse gas emissions.	<b>Suggested language change:</b> Objective: Expand strategies and mechanisms to reduce greenhouse gas emissions on Kaua’i in alignment with the principles and goals adopted in the Paris Agreement.	This is consistent with Hawaii State Law SB 559 and re-establishes it as a priority for Kaua’i.
2	Pg. 183, pp2	In alignment with SB 559 and Hawai’i’s pledge to the United States Climate Alliance, the General Plan’s policy is to reduce island wide greenhouse gas emissions by <b>at least 26-28 percent from 2005 levels by 2025, and 80 percent by 2050.</b> Because those targets are lower than those deemed necessary by the Intergovernmental Panel on Climate Change and the Paris Climate Agreement to keep temperature change below 2 degrees Celsius, the County should aim for the higher benchmark of <b>40 percent reductions by 2030.</b>	<b>Comment:</b> Although it is worth applauding the gesture to set a higher standard for greenhouse gas emissions reduction for Kaua’i, this statement is very confusing. If we are aiming for at least 26-28% reduction by 2025, and 80% by 2050, then how is 40% by 2035 a higher standard? The 2035 target seems right on the mark if we are going to reach the 2050 standard.	

3	Pg. 183, pp3	Achieving an 80 percent reduction in carbon dioxide emissions <b>will require a wholesale transformation of our electricity and transportation systems</b> , and will have far reaching implications for other sectors such as tourism, agriculture, and consumption of imported goods.	<b>Comment:</b> The transportation sector barely addresses carbon emissions reduction as a primary objective, it only comes up as a by-product of addressing traffic and switching to a multi-modal transportation model.	
4	Pgs. 183-184, bottom of page to top of page	Emissions from air travel to support both resident and visitor travel accounted for an approximately equal share of petroleum use compared to ground transportation and electricity in 2013. The State's 1998 climate change action plan noted: <i>"...the difficulty Hawai'i faces in making significant reductions in its emissions. Jet fuel is essential to Hawai'i's tourism-based economy and the wellbeing of its people."</i>	<b>Comment:</b> With a scheduled increase of 42.6% in flights for the first 7 months of 2018 over the same period in 2017, it seems like putting some controls on mainland flights to Kaua'i would be the obvious answer to reducing greenhouse gas emissions, not to mention all the other impacts on our island associated with visitor numbers. <b>Recommendation:</b> As many other island nations around the world have done, from the Galapagos to the Seychelles, Kaua'i, under the leadership and direction of the County, needs to take aggressive actions to control and manage tourism numbers and impacts.	
5	Pg. 184, section 2.4, pp3	Notably, current inventories do not reflect the greenhouse gas emissions embodied in the significant volume of consumer goods imported to Kaua'i every year.	<b>Comment:</b> There are also other factors that also are not accounted for in the inventory of greenhouse gas emissions, including the contribution from methane from livestock. This is an important factor to consider when considering future land uses.	
6	Pg. 184, section 2.5, sentence 3	Focus on key sectors and their interrelationships will be necessary to continue progress in emissions reductions. Key sectors include infrastructure, ground transportation, tourism, consumption and materials management, food and agriculture, and natural resource management.	<b>Comment:</b> Although this sounds good as part of the narrative, the plan does not reflect emissions reduction as a priority throughout the different sectors of the GP. <b>Recommendation:</b> Develop a climate change sub-section for each of the 10 sectors.	



7	Pg. 184, section 2.6, pp1	<p>Kaua'i's extensive fossil fuel dependence means that there is a large task ahead to transform, and ultimately decarbonize, Kaua'i's economy. There will be many benefits to making this transformation.</p> <p><b>Clean energy in the electricity sector already provides local jobs</b>, helps stabilize electricity costs, and reduces dependence on imported fossil fuels. Transforming the ground transportation sector will encourage healthier living, revitalize neighborhoods and downtown business areas, and allow those with limited mobility more options for getting where they need to go. Addressing tourism and air travel will be very challenging, but <b>Kaua'i's commitment to sustainability</b> will resonate with the values of modern travelers.</p>	<p><b>Comments and Recommendation:</b> The Economy sector of this plan needs to develop a clean energy/ green jobs sub-section. This is missing from the GP. Also, "<b>Kaua'i's commitment to sustainability</b>" certainly is not a theme throughout this plan. Either remove this statement or change the GP (preferably the 2<sup>nd</sup> choice).</p>	
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**OVERALL ASSESSMENT: Energy Sustainability, Sub-section: Reduction of Greenhouse Gas Emissions**

It is clear that Kaua'i has made great strides in the area of energy sustainability, for which we should all be proud. However, the General Plan's actions have yet to clearly layout how we are going to meet greenhouse emission standards. A lot of weight is put on developing a climate plan and integrating it into the key sectors. However, it seems that the General Plan could have made a more aggressive effort to do just that and provide a foundation for the climate plan to be built off of.

LOCATION	TEXT/INFORMATION	PROPOSED CHANGE(S)	RATIONALE	
<b>SECTION: Public Safety and Hazards Resiliency, Sub-section: Global Warming and Climate Change Adaptation</b>				
1	Pg. 193, Objective	Objective: To prepare for and adapt to the impacts of climate change on the natural and built environments.	<p><b>Suggested new language:</b> Objective: 1) Assess and map out sectors and geographies, and the associated areas of vulnerability. 2) Build a resiliency framework in policy and planning decision-making to strengthen the adaptive capacity of these areas of greatest vulnerability to climate change impacts.</p>	

2	Pg. 193, section 3.1, pp1, sentence 2	Based on the best available science we should plan for three feet of sea level rise. It is important to note that these estimates may be conservative, as some studies project upwards of 6 feet of sea level rise by 2100.	<b>Comment and Recommendation:</b> The science gives us a range of 3-6 feet. Why not invoke the precautionary principle, particularly given we are an island (most vulnerable to climate impacts), and that the objective states that we want to address our adaptive capacity to climate impacts. So please use the 6 foot sea level rise projection.															
3	Pg. 193, section 3.1, pp2	Coastal areas are expected to experience the greatest amount of change, which in turn will impact the roughly 20 percent of Kaua'i residents who live near the shoreline.	<b>Comment and Recommendation:</b> It would be more accurate to say that 100% of Kauai's residents will directly experience the impacts of climate change.															
4	Pg. 194, Permitting Actions and Code Changes	1. Use the best available climate and hazard science to inform and guide decisions. Determine a range of locally relevant (context specific) sea level rise projections for all stages of planning, project design, and permitting reviews. At the time of this General Plan Update publication, the science suggests a planning target of three feet of sea level rise.	<b>Recommendation:</b> 1) Best available science projects 3-6 feet of sea level change, so let's use 6 feet. 2) Locally relevant sea level rise projections are only useful if you also consider changes in precipitation and the possibility for storm surge (e.g, increase in tropical storms or hurricanes), so please include these factors in the language. 3) In the decision-making process, please access newer erosion data that 2012 as this old of a data set maybe obsolete.															
<p><b>OVERALL ASSESSMENT: Public Safety and Hazards Resiliency, Sub-section: Global Warming and Climate Change Adaptation</b></p> <p>The most conservative approach to climate change, given that the data, projections and understanding of impacts are changing on a regular basis, is to use the 6 ft. sea level rise projection. Adaptation and building resiliency to climate impacts are the result of proactive and pre-emptive planning. Without this in place, we are only going to be reacting and not adapting to climate change impacts. The GP points to the need for adapting to climate change, without giving clear and direction and taking aggressive action.</p>																		
<table border="1"> <thead> <tr> <th>LOCATION</th> <th>TEXT/INFORMATION</th> <th>PROPOSED CHANGE(S)</th> <th>RATIONALE</th> </tr> </thead> <tbody> <tr> <td colspan="5"><b>SECTION: Implementation and Monitoring</b></td> </tr> <tr> <td>1</td> <td>Pg. 213</td> <td>The difficulty with creating and adopting guideposts as these is three-fold: 1) each statistical benchmark may not reflect the reality in its ability to be implemented given</td> <td><b>Comment:</b> From the very beginning of this Plan, the importance of implementation and monitoring has been clearly stated. Nonetheless, in the opening paragraphs of this section of the Plan, there is already</td> <td></td> </tr> </tbody> </table>					LOCATION	TEXT/INFORMATION	PROPOSED CHANGE(S)	RATIONALE	<b>SECTION: Implementation and Monitoring</b>					1	Pg. 213	The difficulty with creating and adopting guideposts as these is three-fold: 1) each statistical benchmark may not reflect the reality in its ability to be implemented given	<b>Comment:</b> From the very beginning of this Plan, the importance of implementation and monitoring has been clearly stated. Nonetheless, in the opening paragraphs of this section of the Plan, there is already	
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1	Pg. 213	The difficulty with creating and adopting guideposts as these is three-fold: 1) each statistical benchmark may not reflect the reality in its ability to be implemented given	<b>Comment:</b> From the very beginning of this Plan, the importance of implementation and monitoring has been clearly stated. Nonetheless, in the opening paragraphs of this section of the Plan, there is already															

		<p>the twenty-year planning horizon in this plan; 2) agencies may neither have the resources nor the method to easily glean the information necessary to accurately monitor a prescribed benchmark; and, 3) the benchmarks may distract from the overall big picture on what future state the community wishes to attain and instead create points of fixation lending to myopic and disjointed decision making. Beyond the difficulties monitoring brightline benchmarks, attaining goals remains a function of political and economic realities locally and globally. For example, Kaua'i, like other counties in Hawai'i, faces mounting fiscal constraints resulting from worldwide economic changes and the continued reduction in Federal funding for infrastructure and other programs like earmarks. (This goes on for 3 more paragraphs).</p>	<p>a disclaimer about why this section cannot meet the standards accepted by and used by planners around the world. I guess what it says is that we heard the community, but were not going to do what you requested.</p>	
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**OVERALL ASSESSMENT: Implementation and Monitoring**

I have read this version of the Implementation and Monitoring section in whole. I have also commented on it extensively in the past. I even re-wrote this entire section of the GP. Some changes have been made like adding a Kakou Committee, conducting a major evaluation every two years and developing a dashboard to show progress. This is a good start, but it doesn't quite take it far enough. Implementation and Monitoring is a critically important bookend to the General Plan.

The front end should provide a growth management framework or model, with associated policies, but this is missing. The middle should be comprised of clear objectives (statements of what is to be achieved by 2035 (or earlier) for each sector), but these are not clearly articulated or measureable – so how are we going to know what kind of results we are looking for? The backend is the implementation and monitoring. For this we need clear indicators – what were going to measure to know if are meeting our objectives. This overall structure is critical to a meaningful and effective General Plan, and this is where we need to tighten the screws.