O‘AHU GENERAL PLAN UPDATE

Written Comments Received on the Second Public Review Draft

Comment period ending May 8, 2017

Department of Planning and Permitting
City and County of Honolulu

May 2017
State Agencies
Ref. No. P-15593

May 5, 2017

HHF Planners
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813
Attention: Oahu General Plan Update

Subject: Review of the Revised Oahu General Plan Second Public Review Draft

Dear Sirs:

Thank you for the opportunity to provide comments on the Revised Oahu General Plan Second Public Review Draft (PRD). The request for comments was transmitted to our office by letter dated March 1, 2017.

It is our understanding that the Department of Planning and Permitting (DPP) has revised the General Plan for the City and County of Honolulu. The PRD provides a comprehensive framework of objectives and policies for the long-range plan for Oahu and offers strategies needed to achieve these goals.

The PRD serves as a guide for government, the private sector, citizen groups, and organizations in land use development. The plan examines 11 areas of concern: population, economy, the natural environment, housing, transportation, energy, physical development, public safety, health and education, culture and recreation, and government operations.

The State of Hawaii has plans and policies in place that involve very similar long-range goals, objectives and policies as those expressed in the PRD. These topics of State-interest provide guidance for allocating resource and setting priorities. These include issues such as population, the environment, affordable housing, transportation facilities, socio-culture advancement, and land use. Many of these State plans and policies fall under the jurisdiction of the Office of Planning (OP).

Our office has reviewed the PRD (with proposed changes) and offers the following comments:

1. Hawaii State Planning Act, Objectives and Policies, Hawaii Revised Statute (HRS) Chapter 226. The purpose of the of the Hawaii State Planning Act is to serve as a guide for the future long-range development of the State; identify the goals, objectives, policies,
and priorities for the State in terms of allocating resources for land, energy, water, and other resources. The Oahu General Plan should be consistent with HRS Chapter 226.

a. Item #16 of the Preamble, Population, page 9 of the Oahu General Plan contains objectives and policies that are consistent with HRS § 226-5 – Objectives and policies for Populations. This statute states that it shall be the objective in planning for the State’s population growth to be consistent with specific physical, economic, and social objectives, such as HRS § 226-5(b)(1) managing population growth in a way that provides increased opportunities and HRS § 226-5(b)(7) planning for the development availability of land and water resources. HRS § 226-5 should be referenced and integrated within the discussion of policies for population in the preamble and within Section I, pages 21-24.

b. Item #17 of the Preamble, The Economy, page 9 is consistent with HRS § 226-10.5 Objectives and policies for potential growth activities. Both HRS § 226-10.5 and the Oahu General Plan presents growth option policies that are resilient to changes in business technology and information services. This statute should be referenced and integrated within the discussion of policies for the economy and long-term sustainability in the preamble and within Section II, pages 25-31.

c. Item #18 of the Preamble, Natural Environment and Resource Stewardship, page 9 presents policy information on protecting natural resources essential for long-term health, maintaining freshwater and marine environment, and the importance of stewardship. This policy is consistent with HRS § 226-11 Objectives and policies for physical environment – land-based, shoreline and marine resources; HRS § 226-12 Objectives and policies for physical environment – scenic, natural beauty, and historic resources; and HRS § 226-13 Objectives and policies for physical environment – land, air, and water quality. The Oahu General Plan should reference and integrate these three statutes within the discussion of polices for the natural environment and resource stewardship in the preamble and Section III, pages 33-34.

d. Item #19 of the Preamble, Housing and Communities, page 10 presents information on policies for affordable housing and integrating communities with the natural environment. This policy is consistent with HRS § 226-19 Objectives and policies for socio-cultural advancement – housing. The Oahu General Plan should reference and integrate this statute within the discussion of policies for housing and communities in the preamble and Section IV, pages 35-38.
e. Item #21 of the Preamble, Transportation and Utilities, page 10 presents policy information on multi-modal transportation systems that are comprehensive and less dependent on fossil fuels. These policies are consistent with HRS § 226-17(b)(1) Objectives and policies for facility systems – transportation, which also advocates for multi-model systems that are comprehensive and can accommodate present and future development. The Oahu General Plan should reference and integrate this statute within the discussion of policies for transportation and utilities in the preamble and Section V, pages 39-44.

f. Item #26 of the Preamble, Health and Education, page 12 presents information on public health, health care services, and the joint responsibilities of both the State, City, and private sector. This policy is consistent with HRS § 226-20 Objectives and policies for socio-cultural advancement – health. The Oahu General Plan should reference and integrate this statute within the discussion on policies for health and education in the preamble and Section IX, pages 61-64.

g. Item #28 of the Preamble, Culture and Recreation, page 13 presents information on policies that encourage and respect the Native Hawaiian culture. This is consistent with HRS § 226-25 Objectives and policies for socio-cultural advancement – culture. The policies presented in the Oahu General Plan on culture and recreation should reference and integrate this statute within the discussion of policies for culture and recreation in the preamble and Section X, pages 65-68.

h. Item #44 of the Preamble, Implementation, page 17 acknowledges the Hawaii State Planning Act. The Oahu General Plan should be more specific and site the statutes listed above and their relevancy to the plans and policies advocated by the City and County of Honolulu.

2. **Priority Guidelines on Sustainability, HRS § 226-108(2).** The Priority Guidelines on Sustainability encourages planning that respects and promotes living within the natural resources and limits of the State. The discussion in the Preamble, items #13 and 14, pages 8-9 of the Oahu General Plan contains information on the principles of sustainability in environmental, economic, and social networks that it seeks to maintain and promote. HRS § 226-108 – the priority guideline on sustainability should be acknowledged, integrated and referenced in the policies developed for the preamble and Section VI.

Resource Conservation (Energy Efficiency) – in regard to item #23 in the Preamble, Energy, page 11 and Section VI, Energy, pages 45-48 of the Oahu General Plan should
include policies, goals and specific targets for energy efficiency certification. Promoting Energy certification may include countywide standards for green building rating systems (such as Leadership in Energy and Environmental Design (LEED)), the Living Building Challenge, Green Globes, Energy Star), in addition to standards for new larger neighborhood developments, including but not limited to nationally recognized rating systems such as LEED for Neighborhood Development (LEED-ND), Green Enterprise Communities or another comparable State approved, nationally recognized, and consensus-based guideline, standard, or systems.

HRS § 196-9 – Energy efficiency and environmental standards for state facilities, motor vehicles, and transportation fuel; acknowledges specific rating systems, and states that the design and construction of State buildings and facilities should meet the LEED silver or two green globes rating system.

3. **Priority Guidelines on Climate Change Adaptation, HRS § 226-109.** The priority guidelines on Climate Change Adaptation should be acknowledged, integrated and referenced in the policies developed in item #24 of the preamble, page 11 and Section VII, Physical Development and Urban Design, pages 49-56. HRS § 226-109 can also be referenced in item #25, of the preamble, page 12, and Section VIII, Public Safety and Community Resilience, pages 57-59.

4. **Priority Guidelines on Affordable Housing, HRS § 226-106.** To ensure alignment with State priority guidelines on affordable housing, Section IV, Housing and Communities, page 35-37, the Oahu General Plan should integrate the relevant State goals, objectives, policies, and priority guidelines on affordable housing and reference this statute.

5. **Transit-Oriented Development (TOD).** Under HRS § 226-63 (c)(1), OP is responsible for coordinating with the counties on strategic planning for TOD. The Oahu General Plan should explicitly address how the County supports interagency TOD coordination and strategic planning between State and County agencies. The Oahu General Plan should also include specific TOD policies that encourage mixed-use development, affordable housing and walkable density within one-half mile of the rail station and transit stops island-wide.

The County’s TOD plans should be referenced as the guiding documents that provide policy direction and vision for neighborhood TOD areas. Specific Transit-Ready Development (TRD) policies should also be developed for areas outside of the rail corridor, directing any growth within one-half mile of bus stops. OP encourages the
development of mixed-use projects for new and infill development located in transit corridors in the State Urban District.

6. **Complete Streets.** Section 5, Objective A, Policy 6 of the Oahu General Plan should reference the relevant State and County Complete Streets policies, pursuant to Act 54, Session Laws of Hawaii 2009 and HRS § 264-20.5. The Oahu General Plan should expand its Complete Streets policies, and include the State Complete Streets principles in its policies: safety, Context Sensitive Solutions, accessibility and mobility for all, use and comfort of all users, consistency of design guidelines and standards, energy efficiency, health, and green infrastructure.

7. **Coastal Zone Management (CZM).** The objectives and policies listed in Section III, Natural Environment and Resource Stewardship, pages 33-34, are consistent with some of the objectives and policies of HRS § 205A-2, the Hawaii Coastal Zone Management Program. The Oahu General Plan should reference HRS § 205A-2.

   a. HRS § 205A-2(4) Coastal ecosystems - addresses the protection valuable coastal ecosystems, including reefs, from disruption and minimizing adverse impacts on all coastal ecosystems.

      Objective A, Policy 3, states that its goal is to protect, restore and enhance stream flows and stream habitats to support aquatic and environmental processes and riparian, scenic, recreational, and native Hawaiian culture and resources.

      Objective B, Policy 1, seeks to protect the island’s significant natural resources which include streams, shorelines, fishponds, reefs, and offshore islands.

   b. HRS § 205A-2(6) Coastal hazards - discusses the reduction of hazards to life and property from tsunami, storm waves, stream flooding, erosion, subsidence, and pollution.

      Objective A, Policy 4, requires development projects to consider hazards such as slope, coastal erosion, floods, and coastal hazards that threaten life and property. This policy is consistent with this statute.

   c. HRS § 205A-2(2) Historic resources - addresses the protection, preserve, and, restoration of natural and manmade historic and prehistoric resources in the coastal zone management area that are significant in Hawaiian and American history and culture.
Objective A, Policy 6 seeks to design and maintain surface drainage and flood-control systems in a manner which will help preserve natural and cultural resources.

d. HRS § 205A-2(8) Public participation - seeks to stimulate public awareness, education, and participation in coastal management.

Objective A, Policy 10, states that it will increase public awareness and appreciation of Oahu’s land, air, and water resources.

e. HRS § 205A-2(10) Marine Resources - exercise an overall conservation ethic, and practice stewardship in the protection, use, and development of marine and coastal resources.

Objective B, Policy 1, seeks to protect the island’s significant natural resources which include shorelines, reefs, and offshore islands.

f. HRS § 205A-2(2) Scenic and open space resources - (B) Ensure that new developments are compatible with their visual environment by designing and locating such developments to minimize the alteration of natural landforms and existing public views to and along the shoreline; (C) Preserve, maintain, and, where desirable, improve and restore shoreline open space and scenic resources; and (D) Encourage those developments which are not coastal dependent to locate in inland areas.

Objective B, Policy 2, seeks to protect Oahu’s scenic views, especially those seen from highly developed and heavily traveled areas.

Objective B, Policy 3, seeks to locate and design public facilities, infrastructure and utilities to minimize the obstruction of scenic views.

8. In the formulation of the economic policies of the Second PRD Oahu General Plan, the City and County of Honolulu should review the Hawaii Statewide Comprehensive Economic Development Strategy (CEDS), 2016-2020 Strategic Plan, developed by OP. The CEDS report provides a blueprint for economic development throughout the state.

A CEDS is a strategy driven plan for regional economic development for the State of Hawaii. Appendix 7, the Oahu CEDS, 2016-2020 Strategic Plan, may prove valuable
in the formulation of the Oahu General Plan’s Economic policies listed in Section II, The Economy, pages 25-31 of the Oahu General Plan.

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

Sincerely,

[Signature]

Leo R. Asuncion
Director
HHF Planners
Attn: O‘ahu General Plan Update
733 Bishop Street, Suite 2590
Honolulu, Hawai‘i 96813

Dear Acting Director Sokugawa:

Subject: Revised General Plan Second Public Review Draft

The Department of Hawaiian Home Lands acknowledges learning of the opportunity to provide comments on the above-cited project via the City’s website. After reviewing the materials submitted, we would like to submit the following comments:

1. We highly encourage all agencies to consult with Hawaiian Homestead community associations and other (N)ative Hawaiian organizations to better assess potential impacts to cultural and natural resources, access and other rights of Native Hawaiians.

2. How will the affordable housing policies benefit Native Hawaiians?

3. While the planning issues addressed are quite comprehensive, each planning issue should be considered in correlation with other issues identified. Each issue identified does not occur without impacting another issue, and it must therefore be considered more holistically as well.

4. Consider stronger verbs to describe how population growth is weighed in the calculus of the limits of O‘ahu’s natural resources (Population, Objective A). Instead of “considers,” it is suggested that the language be as follows:
“To plan for future population growth in a manner that...”

is responsive “...to the limits of Oahu’s natural resources, that protects the environment, and that minimizes social, cultural, and economic disruptions.”

5. Please correct “malahini” to “malihini” on page 13, item 29, and 68, item 427.

Mahalo for the opportunity to provide comments. If you have any questions, please call Sharde Freitas, at 620-9485 or contact via email at sharde.k.freitas@hawaii.gov.

Aloha,

Jobie M. K. Masagatani,
Chairman
Hawaiian Homes Commission

c: O‘ahu Homestead Associations
May 8, 2017

HHF Planners
ATTN: O‘ahu General Plan Update
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813
Email: gp2035@hhf.com

RE: Comments and Recommendations Concerning Second Public Review Draft
O‘ahu Revised General Plan

Aloha,

On behalf of the Department of Public Safety (PSD), thank you for the opportunity to provide comments and recommendations concerning the Second Public Review Draft – O‘ahu Revised General Plan. We are pleased that portions of the Second Public Review Draft Plan address O‘ahu’s public safety interests. However, it may be well to address additional policy considerations in Section XIII. Public Safety and Community Reliance and Section IX, Health and Education. PSD has attached for your consideration, proposals for policy revisions and additions which we believe would better address the needs of the criminal justice system on O‘ahu.

Please do not hesitate to contact Mr. Clayton H. Shimazu, Chief Planner, with any questions concerning the Department’s comments on the O‘ahu Revised General Plan. He may be reached at telephone: (808) 587-1237 or email: clayton.h.shimazu@hawaii.gov. Mahalo.

Sincerely,

Nolan P. Espinda
Director

c: Chief Planner C. Shimazu
   Business Management Officer T. Fernandez
   Deputy Director for Administration C. Ross

Attachment

"An Equal Opportunity Employer/Agency"
COMMENTS AND RECOMMENDATIONS CONCERNING
SECOND PUBLIC REVIEW DRAFT - O'AHU GENERAL PLAN

Submitted by:
Hawaii Department of Public Safety
919 Ala Moana Boulevard, Honolulu, Hawaii 96814
Nolan P. Espinda, Director
May 3, 2017

The Hawaii Department of Public Safety is pleased to submit its comments and recommendations concerning the Second Public Review Draft – O’ahu General Plan. Portions of the Second Public Review Draft Plan discuss the vision for public safety on Oahu. While Section XIII, PUBLIC SAFETY AND COMMUNITY RELIANCE, Policy 2 (page 57) addresses criminal justice facilities and Policy 9 (page 57) addresses the need for improvements to rehabilitation programs and facilities, no specific mention is made of:

- The need for a new Oahu Community Correctional Center (OCCC) to replace the current obsolete facility and that planning for a new OCCC is currently underway.

- The need to upgrade and expand the Women’s Community Correctional Center (WCCC) to accommodate the female jail population along with the growing number of female inmates.

- The likely eventual need to upgrade the Waiawa Correctional Facility.

- The goal of the State of Hawaii, and the Department of Public Safety in particular, to return inmates to Hawaii that are currently housed in private prison facilities on the mainland. This would necessitate expansion to State prison facilities on Oahu (or elsewhere in Hawaii) and/or development of a new state prison on Oahu.

- Expand access to mental health, drug treatment, community based programs and other treatment programs and services to reduce the reliance on the criminal justice system to provide such services.

The Hawaii Department of Public Safety considers it important that additional consideration to the needs of the criminal justice system on Oahu be addressed in revised O’ahu General Plan policies. Proposed policy revisions and additions are provided below.

VIII. PUBLIC SAFETY AND COMMUNITY RESILIENCE

PAGE 57, CURRENT POLICY 2: Provide adequate, safe and secure criminal justice facilities and adequate training and staffing for City and County law enforcement agencies.

- PROPOSED ADDITIONAL/REVISED POLICY 2A: Provide adequate, safe and secure criminal justice facilities to accommodate juvenile offenders and adult detention, prison and pre-release populations.

- PROPOSED ADDITIONAL/REVISED POLICY 2B: Support development of modern, new facilities to house current and future adult detention, prison and pre-release populations including plans for a new Oahu Community Correctional Center and improvements to the Women’s Community Correctional Center, Waiawa Correctional Facility, and Halawa Correctional Facility.
• PROPOSED ADDITIONAL/REVISED POLICY 2C: Support policies intended to return inmates from private prison facilities located on the mainland to state-run facilities in Hawaii.

Page 2:

• PROPOSED ADDITIONAL/REVISED POLICY 2D: Provide adequate staffing, training, equipment, and resources for State of Hawaii and City and County law enforcement and corrections agencies.

• PROPOSED ADDITIONAL/REVISED POLICY 2E: Encourage and support communication and coordination across federal, state, city and county law enforcement and corrections agencies.

PAGE 57, CURRENT POLICY 7: Conduct periodic reviews of criminal laws to ensure their relevance to the community's needs and values.

• PROPOSED ADDITIONAL/REVISED POLICY 7A: Support reforms to criminal laws and policies to emphasize treatment, diversion and rehabilitation programs for adult and juvenile offenders as alternatives to incarceration.

PAGE 57, CURRENT POLICY 9: Encourage the improvement of rehabilitation programs and facilities for criminals and juvenile offenders.

• PROPOSED ADDITIONAL/REVISED POLICY 9A: Support policies and programs that expand access to treatment, rehabilitation, and re-entry programs for adult and juvenile offenders.

• PROPOSED ADDITIONAL/REVISED POLICY 9B: Provide for the improvement, expansion, innovation and development of rehabilitation programs to include re-entry programs which aim to reduce recidivism.

• PROPOSED ADDITIONAL/REVISED POLICY 9C: Encourage the improvement, expansion, renovation, innovation and development of treatment, rehabilitation, and re-entry facilities for adult and juvenile offenders.

IX. HEALTH AND EDUCATION

PAGE 61, CURRENT POLICY 7: Support efforts to make health care more accessible for everyone.

• PROPOSED ADDITIONAL POLICY 7A: Support efforts to improve and expand access to mental health, drug treatment, community based programs and other similar programs for those requiring such services.
City and County Agencies
March 29, 2017

HHF Planners
Attn: Oahu General Plan Update
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

To Whom It May Concern,

Subject: Revised General Plan Second Public Review Draft

Thank you for the opportunity to review and comment. The Department of Design and Construction has no comments at this time.

If you have any other questions please call me at 768-8480.

Sincerely,

Robert J. Kroning, P.E.
Director

RJK:ms(682199)
Reviewer: Robert H-H Harter, Emergency Management Staff Officer (Hazardous Materials) 
Department of Emergency Management

Subject: Revised General Plan Second Public Review Draft

(With proposed changes shown) – February 2017

<table>
<thead>
<tr>
<th>Page</th>
<th>Paragraph</th>
<th>Comment</th>
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<tbody>
<tr>
<td>12</td>
<td>25</td>
<td>Recommend the deletion of specifically mentioning of Honolulu Police Department (HPD) and City Prosecutor in this paragraph as throughout this document specific departments have not been mentioned to allow for organizational changes which may occur during future administrations. Also HPD is not the only department who “…deal with the protection of people and property from natural disaster and emergencies, traffic and fire hazards and unsafe conditions.”</td>
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<td>22</td>
<td>64</td>
<td>Recommend delete “Policy 5 / Encourage Family Planning”. This sounds like the City and County of Honolulu is advocating “birth control”. Is that really the “slippery slope” of potential controversy the plan needs to address? What is it that this policy really trying to say? Find a better word choice?</td>
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<td>22</td>
<td>65</td>
<td>Recommend adding the following for clarity “…a pattern of managing population growth distribution that…”</td>
</tr>
<tr>
<td>24</td>
<td>Map</td>
<td>Recommend the correct term to the map key “Primary Urbanized Area Center (PUC)” as this is the term used consistently throughout this document.</td>
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<tr>
<td>25</td>
<td>70</td>
<td>Recommend deleting the word “decent” as it is a very undefinable word as in - what is decent versus indecent. Possibly replace the word with “sustainable”.</td>
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<td>25</td>
<td>75</td>
<td>Recommend deleting the word “small” so that this policy is consistent with wording in paragraph 72 (Policy 2) where the word “small” was deleted when referring to businesses.</td>
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<tr>
<td>31</td>
<td>138</td>
<td>Recommend the following word changes to provide correctness, consistency and clarity – “…military-related employment both on and off base in the Hickam-Pearl Harbor Joint Base Pearl Harbor – Hickam, Wahiawa Schofield Barracks / Wheeler Army Airfield, Kailua Kaneohe and Marine Corps Base Hawaii areas.</td>
</tr>
<tr>
<td>35</td>
<td>158</td>
<td>Recommend deleting the word “decent” as it is a very undefinable word as in - what is decent versus indecent. Possibly replace the word with “sustainable”. Consistency as in found on (Page 25, Paragraph 70).</td>
</tr>
</tbody>
</table>
Recommend deleting the word “suburban” and use “urban fringe” which is the term used in the map key found on page 24 for consistency.

Recommend adding “…reducing waste streams through reduction, reuse and recycling.”

Recommend adding “Requiring the safe use and disposal of hazardous materials and waste.” for correctness, clarity and inclusiveness.

Recommend deleting the word “public” when referring to utilities as the City and County Honolulu uses a mix of public and private utilities and the efficient use of all utilities is required for greater efficiencies.

Recommend deleting the word “and” at paragraph/line “e.”

Recommend deleting the word “City” form the reference of utilities for clarity and correctness and the same rational as paragraph 231 comment.

Recommend adding “…future energy generation, transmission, storage and use.” for completeness and clarity.

Recommend adding and changing the word order to read “…major sources of water, air, noise and light pollution.” For completeness and inclusiveness.

Recommend deleting the word “office” and using the word “commercial” for correctness.

Recommend using the term and reference “Kalaeloa Barbers Point Harbor” (KBPH) as this is the term used in the Hawaii Department of Transportation – Harbors Division Master Plan for the location and area.

Recommend providing a short description of what the “green belt system” is for clarity.

Recommend including the “Complete Streets” concept of the comprehensive, integrated network of streets that are safe and convenient for all people whether traveling by foot, bicycle, transit or automobile, and regardless of age or ability.

Recommend creating a separate policy or bullet for “…adequate training and staffing for City and County law enforcement agencies.” as this is a separate focus from “criminal justice facilities”.

Recommend changing the policy to read “Collaborate with State and Federal agencies to provide emergency warning, plan for the prevention, protection,
mitigation, response and recovery before, during and after emergencies such as

tsunamis, hurricanes, and other hazardous events.” Rewriting to policy is
required for correctness, completeness and clarity.

Recommend deleting the term “civil defense” throughout this document as the
correct term is “emergency management” as in the City and County of
Honolulu, Department of Emergency Management (name change from Oahu
Civil Defense in 2007), the Hawaii Emergency Management Agency (name
change from Sate Civil Defense in 2013), and the Federal Emergency
Management Agency (name change in 1979). The name change and focus in on
an all-hazards approach to emergency and disaster preparedness, mitigation,
response and recovery.

Further recommend the policy be changed to read “Develop emergency
management plans, policies, programs, and procedures to protect and promote
public health, safety, and welfare of the people.” for completeness.

Recommend deleting the term “civil defense” and replacing it with the correct
term “emergency management”, rational as found in paragraph 368 comments.
Add the following “...preparedness, mitigation, response and recovery, fire
protection...”.

Recommend delete the term “pollution” and use the word “quality”.

Recommend adding the following “…informal educational lifelong learning
programs...” as lifelong learning is defined as ongoing, voluntary, and self-
motivating pursuit of knowledge for either personal or professional reasons.

Recommend deleting the word “native” and have it read “…natural
environment and native Hawaiian host culture.” as that may be a more
acceptable reference.

Recommend add the word “enhancement” to convey the thought of improving
(bettering) where applicable, change to read as follows “…restoration,
preservation, maintenance, and enhancement of social, cultural...”.

April 25, 2017

HHF Planners
ATTN: Oahu General Plan Update
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

Gentlemen:

SUBJECT: Revised General Plan Second Public Review Draft

The Department of Planning and Permitting has asked the department to review and forward any comments on the subject Revised General Plan Second Public Review Draft to your attention.

The Department of Parks and Recreation has no comment.

Should you have any questions, please contact Mr. John Reid, Planner at 768-3017.

Sincerely,

Michele K. Nekota
Director

MKN:jr
(682087)

cc: Kathy Sokugawa Acting Director, Department of Planning and Permitting
May 8, 2017

HHF Planners
ATTN: Oahu General Plan Update
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

Dear HHF Planners:

SUBJECT: Revised General Plan Second Review Draft

This responds to the March 1, 2017, correspondence from the Department of Planning and Permitting, requesting our review of the subject project. Based on our review, we have the following comments:

- Objectives are specific, measurable, agreed upon, realistic, and time-bound; which does not appear to align with the objectives identified in the plan. We recommend replacing the word “objective” with “goal” throughout the document.

Under the Population Section

- Policy 4: The Distribution of Residential Population is inconsistent with forecasts included in Neighborhood TOD Plans. Consider adjusting the distribution to align with TOD plans or creating an alternate TOD scenario population distribution, (pg. 18).

Under the Transportation Section:

- Policy 5: We recommend replacing “cruise ship terminals” with “maritime terminals” (pg. 33).

- Policy 6: Consider deleting “incorporate Complete Streets features” and replace with “are based on Complete Streets principles” (pg. 33).
• **Policy 10:** This policy statement could be augmented by adding "staggered school schedules," which would avoid the start/end time overlap of schools (i.e. universities, private and public schools) with the peak vehicle congestions periods (pg. 34).

Thank you for the opportunity to review this matter. Should you have any questions, please contact Virginia Sosh of my staff at 768-5461.

Very truly yours,

Wes Frysztacki
Director
May 3, 2017

ATTN: Oahu General Plan Update  
HHF Planners  
733 Bishop Street, Suite 2590  
Honolulu, Hawaii 96813

Dear HHF Planners:

Subject: Revised General Plan Second Public Review Draft

In response to a memorandum from Kathy Sokugawa of the City and County of Honolulu Department of Planning and Permitting (DPP) dated March 1, 2017, regarding the above-mentioned subject, the Honolulu Fire Department determined that there will be no significant impact to fire department services.

Should you have questions, please contact Battalion Chief Wayne Masuda of our Fire Prevention Bureau at 723-7151 or wmasuda@honolulu.gov.

Sincerely,

[Signature]

SOCRATES D. BRATAKOS  
Assistant Chief

SDB: jc

cc: DPP
April 19, 2017

HHF Planners
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

Attention: Oahu General Plan Update

To Whom It May Concern:

This is in response to a memorandum (dated March 1, 2017) from the Department of Planning and Permitting, City and County of Honolulu (C&C), requesting comments on the Second Public Review Draft for the Oahu General Plan.

The Honolulu Police Department has reviewed the plan and has concerns regarding Chapter VIII, Public Safety and Community Resilience, on page 57.

We recommend replacing "Community Resilience" with "Emergency Preparedness" which pertains to "disaster-ready communities." Preparations for disasters and emergencies are a cooperative, joint endeavor with the Department of Emergency Management, C&C, to coordinate the protection of people and property during a crisis situation. Together we can coordinate the emergency management activities and functions of the city with those of the state and federal governments and other public or private organizations during natural disasters and other emergencies to assist the community.

We also recommend that Policies 2, 3, and 9 under Objective B be deleted from Chapter VIII, Public Safety, and transferred to Chapter VII, Physical Development and Urban Design. Physical design requirements should be determined at the planning stages of a project. Additionally, the developer should be responsible for compliance with all of the rules and regulations. Further, the specifications should also be implemented before beginning construction at the project area.

If there are any questions, please call me at 723-3856.

Sincerely,

CARY OKIMOTO
Acting Chief of Police

By MARK TSUYEMURA
Management Analyst VI
Office of the Chief

Serving and Protecting With Aloha
HHF Planners
ATTN: Oahu General Plan Update
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

Gentlemen:

Subject: March 1, 2017 Transmittal of the Second Public Review Draft of the Proposed Revisions to the Oahu General Plan from the Department of Planning and Permitting, City and County of Honolulu

Thank you for your transmittal of the Second Public Review Draft of the proposed revisions to the Oahu General Plan.

Our previous comments of April 12, 2013 are enclosed and we note that the General Plan’s population projections have been extended from 2025 to 2040.

If you have any questions, please contact Scot Muraoka, Long Range Planning Branch of our Water Resources Division, at 748-5942 or email smuraoka@hbws.org.

Very truly yours,

[Signature]

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

Enclosure
2035 Oahu General Plan  
c/o Helber Hastert & Fee, Planners  
733 Bishop Street, Suite 2590  
Honolulu, Hawaii 96813  

Gentlemen:  

Subject: March 13, 2013 Transmittal of the Public Review Draft of  
the Proposed Revisions to the Oahu General Plan from the  
Department of Planning and Permitting, City and County of Honolulu  

We are in receipt of the Public Review Draft of the proposed revisions to the Oahu General Plan.  

The Board of Water Supply has no comments on the proposed revisions to the General Plan, but note that the General Plan’s population projections extend only to 2025.  

If you have any questions, please contact Scot Muraoka at 748-5942.  

Very truly yours,  

[Signature]

ERNEST Y. W. LAU, P.E.  
Manager and Chief Engineer  

MC/SM:js  
cc: V Scot Muraoka  
Michael Cubas  
13-0351
Neighborhood Boards
Dear HHF Planners,

At its April 25, 2017, meeting, the Hawai‘i Kai Neighborhood Board (Board) discussed the Second Public Review Draft of the O‘ahu General Plan (Revised OGP), dated February 2017. By a vote of 8-1-2 (aye, nay and abstain), the Board expressed the following concerns with the Revised OGP:

- Section III, Natural Environment and Resource Stewardship (page 27): Threat of invasive species and the importance of biosecurity is absent here and is not found anywhere in the Revised OGP, despite recent and ongoing city issues concerning little fire ants and the coconut rhinoceros beetle. We recommend including a policy addressing invasive species prevention and/or biosecurity.

- Section V, Transportation and Utilities: We recommend Objective B (page 34) be separated so that ensuring an adequate fresh water supply for residents and ensuring a sound system of waste disposal are appropriately addressed. These two objectives, water supply and waste disposal, are two entirely separate needs. We are surprised that a safe and sustainable fresh water supply is not mentioned as an objective or policy under Section III, Natural Environment and Resource Stewardship, or under any other section for that matter. Water supply should not be under Transportation and Utilities.

- Section V, Transportation and Utilities: We recommend Objective B, Policy 9 (page 35) be expanded to include proper and safe disposal of both hazardous and non-hazardous waste to address illegal dumping of construction and green waste.

- Section VI, Energy: Objective A, Policy 3 (page 37) directs the city to “promote and assist efforts to establish adequate fossil fuel supply reserves . . . .” We have concerns with this broad directive given what we’re learning from the Department of Defense’s Red Hill site. We recommend Policy 3 be clarified or deleted.

- Throughout the Revised OGP the term “multi-modal transportation system” is used and is not defined, e.g., Objective A under Transportation and Utilities is “To create a
multi-modal transportation system . . .” (page 33), and Objective B, Policy 4 under Energy is “Promote further progress in the development of a multi-modal transportation system . . .” (page 38). The city should define for its taxpayers what a “multi-modal transportation system” is and how “transit-oriented development” fits into that.

- The Board expresses concern that the term “transit-oriented development” used in the Revised OGP is inconsistent with the existing East O‘ahu Sustainable Communities Plan, and we strongly seek to maintain no change. Throughout the Revised OGP, there is a push for transit-oriented development (TOD), and our community “kiss-and-ride stations” or other transportation stations could be categorized as areas for TOD many years from now. Mr. Hata explained that to his knowledge he thinks that TOD refers only to rail stations, and there are no rail stations planned for Hawai‘i Kai.

- The Board objects to any proposed revisions in the Revised OGP that would allow transient vacation rentals (TVRs) in TODs or anywhere, permits any visitor accommodations in non-resort areas, or would utilize our unique natural environment, which should stay natural. The Revised OGP proposes revisions that would allow short-term vacation rentals in TODs, permits small-scale community-oriented visitor accommodations in non-resort areas, and calls for utilizing our unique natural environment by creating and promoting recreational venues for keiki and kupuna and for kama‘aina and malahini (tourists/visitors). There are different terms used in Hawai‘i to identify short-term vacation rentals, including TVRs, transient vacation units, individual vacation units, and vacation rental units. This policy has the potential to turn our communities into transient accommodation living areas, and the term “small-scale” is not defined. Furthermore, Objective D, Policy 13 under Culture and Recreation (page 51) states that the city should promote recreational venues for residents and visitors; however, time and time again it is clear that the city (and state) are unable to provide for safe and clean infrastructure to accommodate large visitor numbers, and the community pays the price.

Thank you for your time and consideration of our comments. We look forward to your reply.

Aloha,

Natalie Iwasa, Chairperson
Hawai‘i Kai Neighborhood Board

cc:  Councilmember Trevor Ozawa
     Senator Stanley Chang
     Senator Laura Thielen
     Representative Mark Hashem
     Representative Gene Ward
     Kathy Sokugawa, Department of Planning and Permitting
     Members of the Hawai‘i Kai Neighborhood Board (via email)
The Kahalu'u Neighborhood Board #29 adopted the following comments at a special meeting on May 4, 2017, having received comments from several community groups. We support and incorporate the comments of Malama Waihe'e, an unincorporated hui of area residents, farmers and other interested individuals particularly concerned with planning and land-use issues in and around Waihe'e ahupua'a. We also support the comments of the Kailua Neighborhood Board #31, to the extent that the comments of the Kahalu'u Neighborhood Board are primary and relevant for our neighborhood area.

We agree with the concepts upon which we can and must build¹: “sustainability”; “managing population growth”, emphasis on “economic diversification”; attention to “relationships” (“quality of life”, the “Native Hawaiian Culture”); and more. We strongly support the State’s constitutional mandate to protect our agricultural lands, thereby preserving the public trust.

We support the inclusion, in numerous instances throughout the Plan, the introduction of “new and revised objectives and policies to strengthen communities... and design solutions to prepare for impacts from natural hazards related to climate change and sea level rise (our emphasis here)².

BEFORE finalizing The Plan we believe a number of critical issues must be addressed and resolved.

- The first sentence of The Plan states:
  - “[t]he General Plan for the City and County of Honolulu is a comprehensive statement of objectives and policies which sets forth the long-range aspirations of O‘ahu’s residents and the strategies of action to achieve them.” (Second Public Review Draft, O‘ahu General Plan, February 2017.)
  - We believe the Plan is a guide to managing and directing “desirable population distribution and regional development patterns for the island of O‘ahu”³.

- Before we can guide future population distribution and growth however, the issue of climate change needs to be addressed and accounted for.
  - In our neighborhood board area alone, there is a need for planning parameters that must address the uncertain sustainability of coastal highways or properly manage land use in coastal areas by insisting on projections of the “new” high water marks attributed to rising sea level. Concerns include roadways; water resources, sewer lines, critical coastal zone management areas, and electrical utilities.
  - O‘ahu voters approved a City Charter amendment establishing a County-level Office of Climate Change that should establish guidance beyond “plan and prepare” for

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¹ O‘ahu General Plan Second Public Review Draft pages ii, iii, iv from Overview of the Update Process and Summary of Changes
² Preamble, section 9, second paragraph
³ Preliminary, section 9, second paragraph
⁴ General Plan VII. Physical Development and Urban Design Objective B, page 50
impacts of climate change⁴; The Plan must also address our responsibility to mitigate/prevent the advance of climate change to the extent practicable – doing our part to live more sustainably!⁵

Similar to climate change, we believe that no development (growth) should even be considered unless required infrastructure is in place, i.e. an adequate supply of clean water, waste water disposal, transportation not threatened by rising seas, established power connections, et cetera. To do otherwise ignores current realities.

**CLIMATE CHANGE**

“The Kahalu‘u Neighborhood Board #29 supports the increased focus in the proposed O‘ahu General Plan on addressing climate change and community resilience that is reflected in the additional language of “Community Resilience” and adding specific language in the Physical Development and Infrastructure Sections.

Given the importance of climate change that will affect ALL elements of the General Plan, KNB #29 recommends changes and additions to:

- **Introduction** (page 3, #1): Delete last sentence that is language not appropriate for the general plan and more for a development plan. It is confusing and inappropriately highlights future growth and conflicts with the language of the Preamble.
  - “This planning process serves as the coordinative means by which the City and County government provides direction to accommodate for the future growth projected for O‘ahu of the metropolitan area of Honolulu.”

- **Preamble** (page 7; #9): Add a sentence after the 2nd paragraph in this section (that begins and ends “Under the Revised Charter... desirable population distribution and regional development pattern”):
  - “General welfare and prosperity are directly linked to an updated General Plan’s ability to foster resilient communities as we face emerging challenges from climate change impacts, social equity, and demographic changes that impact culture.”

- **Preamble** (page 11; #24): Add from (page 50-51) #293 to #296.
  - “Plan and prepare for the long-term impacts of climate change by integrating climate change adaptation into the planning, design, and construction of all significant improvements to and development of the built environment; coordinating plans in the private and public sectors that support research, monitoring, and educational programs on climate change; and preparing for the anticipated impacts of sea level rise on existing communities and facilities through remediation, adaptation, and other measures.”

- **Content of the General Plan** (Page 8, #13), KNB#29 recommends including climate right up front in this section as follows addressing sustainability, replacing the first sentence with the following changes:
  - “A future which is sustainable is also of great importance for an island community interest in the current and future well-being of its people. For an island community to provide social and economic benefits over the long term to

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4 General Plan VII. Physical Development and Urban Design Objective B, page 50
5 [https://obamawhitehouse.archives.gov/sites/default/files/docs/state-reports/HAWAI1_NCA_2014.pdf](https://obamawhitehouse.archives.gov/sites/default/files/docs/state-reports/HAWAI1_NCA_2014.pdf)
citizens, the General Plan recognizes that resilience and sustainability are of equal paramount importance in an era where climate change will impact all eleven areas of concern articulated below."

- **PUBLIC SAFETY AND COMMUNITY RESILIENCE** (Page 12, #25) KNB #29 recommends editing the last sentence to the following: "This includes creating disaster-ready communities that are mentally and physically prepared for disasters, including those caused by climate change and sea level rise." Community resilience is the capacity of individuals, institutions, businesses, and systems within our city to "bounce back," adapt, and thrive no matter what kinds of chronic stresses and acute shocks we may experience. This includes creating disaster-ready communities that are mentally and physically prepared to survive natural disasters that may occur—including those caused and intensified by climate change and sea level rise—but also have the ability to recover quickly and "bounce forward" to ensure the community is strengthened for the next shock."

- **OTHER RECOMMENDATIONS**
  - (Content Section: 11 Areas of Concern)
  
  - **Population (p 9; p 21) Objective A:**
    - For both the summary (p 9) and related Objectives (p 21) language referring to "growth" should be consistent (adopt, on page 21) use of the term "anticipated future growth" (as used on page 9); consistency will ensure that "growth" is not what is being promoted, but managed as described in #59, p 21, Objective A;
    - In addition, both sections should incorporate the term "carrying capacity", adding language as follows: (from p 21 #59) "...that protects the environment, and that minimizes social, cultural, economic and environmental disruptions and that addresses carrying capacity."

- **The Economy: (page 9 and pages 27-29):**
  - Page 9: Delete reference to "21st Century" (A new policy also promotes a 21st century economy that respects our traditional cultural values.) The term is not defined and will quickly become outdated.
  - Objective B (Page 27): #95: Delete " Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively." Add
    - " Effectively enforce the current ban on vacation rentals and bed & breakfasts in residential neighborhoods to bring down rental and housing prices for O‘ahu’s residents."
  - Objective C (pages 27-29): Section relating to Agriculture:
    - #99 Add “and market places” between “market” and “opportunities” to acknowledge actual sites and sites needed to promote local agriculture and erase “food deserts” – areas with limited access to food. There is no mention of either “markets” or “market places around the island – not even mention of the City’s own, highly successful Peoples Open Markets that have existed since the 70’s.
    - #104: Retain language in former Policy 5 in this Objective C section (this relates to maintaining agricultural land along the Windward, North Shore, and Waianae coasts..."
- #105/Policy 6: change to read “…high-quality agricultural lands”
- #107/Policy 7: change to read: “Encourage landowners to permanently preserve agricultural land with high-quality productivity potential for agricultural purposes”
- #109/Policy 8: change to read “Prohibit the urbanization of high-value agricultural land located outside of the City’s growth boundaries”
- Food Security needs to be addressed here: Develop and include language, based on stated facts, percentages rating O’ahu’s dependence on and access (area by area) to food, markets etc.;
- Encourage Food production not just on Agricultural lands (ie: recognition of and encouragement of Urban agricultural production and associated incentives)
- Water: Based on major court and contested case(s) actions over the past three decades, identify the importance of protection for watersheds and uses therein, including small, rural family farms, lo‘i etc., previously impacted by out of watershed water diversions.

- Natural Environment and Resource Stewardship:
  - Objective B/Policy 2 (page 34) #154: Change to read “Protect O‘ahu’s scenic views, especially those seen from highly developed and heavily traveled areas.”

- Housing and Communities
  - Objective A: (pages 36-37)
    - #175 & #176: Policy 16 and 17 are a social issue more than a housing issue; combine them and place with IX. Health and Education/Page 61 under Objective A
  - Objective B (page 37) #177: Change to read as follows: “To reduce speculation in land and housing.”
    - (page 37, #179): Change to read as follows: “Discourage private developers from speculation in lands outside of areas planned for urban use.”
  - Objective C:
    - (p. 38, Policy 4, #188): Change to read as follows: “Encourage residential development only in areas where adequate infrastructure currently exists in suburban areas where existing roads, utilities, and other community facilities are not being used to capacity, and in County-zoned Urban areas where higher densities can be readily accommodated.”

- Physical Development and Urban Design:
  - Objective A:
    - (page 49) #278: Retain “Policy 1 Plan for the construction of new public facilities and utilities in the various parts of the Island according to the following order of priority: first, in the primary urban center; second, in the secondary urban center at Kapolei; and third, in the urban fringe and rural areas.”
    - (page 50) #284 & 285: Retain both Policy 6: “Facilitate transient-oriented development in transit station areas to create live/work/play multi-modal communities that reduce travel and traffic congestion. Encourage the clustering of development to reduce the cost of providing utilities and other public services.”
  - Objective E:
(page 53) #314: Change to read: “To maintain those development characteristics in the urban-fringe and rural areas which keep them desirable places to live and farm.”

(page 53) #315: Retain “Develop and maintain urban-fringe areas as predominantly residential areas characterized by generally low rise, low density development which may include significant levels of retail and service commercial uses as well as satellite institutional and public uses geared to serving the needs of household.”

(page 53) #316: Move Policy 2 to Objective D.

(page 53) #317: Move Policy 3 to Objective D.

(page 53) #318: Add and Retain: “Maintain rural areas as areas which are intended to provide environments supportive of lifestyles choices which are dependent on the availability of land suitable for small to moderate size agricultural pursuits, a relatively open and scenic setting and/or a small town, country atmosphere consisting

Delete #319/Policy 5 (page 53): “Policy 5 encourage the development of a variety (of) housing choices including affordable housing in rural communities to replace lost housing inventory, and five people the choice to continue to live in the community that they were raised in.”

Delete #320/Policy 6 (page 54): “Policy 6 Ensure the social and economic vitality of rural communities by supporting infill development and modest increases in heights and densities around existing rural town areas where feasible; and modest adjustments to growth boundaries to maintain an adequate supply of housing for future generations.”

###
The General Plan consists of general statements and objectives and policies for each of the 11 sections – population; economic activity; Natural Environment; Housing; Transportation and Utilities; Energy; Physical Development and Urban Design; Public Safety; Health and Education; Culture and Recreation; Government Operations and Fiscal Management.

Major changes proposed for the first time in the General Plan

- **Transit-oriented-development (TOD)** is proposed in several sections which means that TOD will not have to be connected to a rail line or rail station but can be developed around any bus stop, which is considered a transit station.
  - **TOD is defined** as a mixed-use residential and commercial area designed to maximize access to public transport. A typical TOD neighborhood has a center with a transit station or stop (train station, metro station or bus stop) surrounded by relatively high-density development with progressively lower-density development spreading outward from the center.

  **TODs generally are located within a radius of ¼ to ½ mile from a transit stop.**

- KNB opposes detaching TOD from the Honolulu rail corridor and allowing TOD in every community throughout the island.

- KNB opposes the promotion of higher density and mixed-use development as a policy for all areas regardless if the community is rural or suburban and not in the district Development/Sustainable Communities Plans.

- KNB opposes changing the focus of the General Plan from directed growth areas of Honolulu to all of Oahu without much public discussion on the implications and ramifications of this drastic shift.
  - future growth of the metropolitan area of Honolulu to provide direction to accommodate the future growth projected for Oahu

- KNB opposes allowing short-term vacation rentals in residential/apartment zoned non-resort areas. Simply using the consultant conclusion that there is a demand for vacation rentals is an insufficient basis for DPP to conclude that short-term...
vacation rentals are appropriate.

INTRODUCTION

- KNB recommends deletion of the new underlined language in #1 because it changes the focus of the General Plan from directing growth to the metropolitan area of Honolulu to all of the island.

- KNB recommends that the current language be retained.
  This planning process serves as the coordinative means by which the City and County government provides direction to accommodate the future growth projected for Oahu of the metropolitan area of Honolulu.

THE ECONOMY Pg. 9

- KNB recommends that the new policy in #17 be deleted because there is no definition of what a 21st century economy is, what it is suppose to promote or how it will accomplish the objectives of the General Plan.
  A new policy also promotes a 21st-century economy that respects our traditional cultural values.

NATURAL ENVIRONMENT AND RESOURCE STEWARDSHIP Pg. 9

- KNB recommends that the sentences after community be deleted because this is a marketing statement not a planning policy and does not belong in the General Plan.
  Protecting the island’s natural resources is essential to ensuring the long-term health and quality of life of the community. Besides an array of biologically-rich and diverse ecosystems, there are the year round mild and amiable climate, beautiful mountains, attractive beaches, scenic vistas, and freshwater and marine environments that are enjoyed by residents and visitors alike.

HOUSING AND COMMUNITIES Pg. 10.

- KNB recommends that the last sentence in #19 be deleted because it is unclear what the objective is and what is meant by the statement that whole communities will be well integrated. Also, there is no definition of what constitutes a whole community.
  This section recognizes the importance of developing whole communities that are well integrated with the surrounding land uses and natural environment.

- KNB recommends that proposed #20 be deleted because it is too broad and implies that mixed-use and transit-oriented developments are desired and appropriate for all communities on Oahu, which of course is not the case. The objectives and policies for housing ensure a wide range of housing opportunities and choices; to increase the availability of affordable housing; higher-density housing via mixed use and transit-oriented developments; to increase the use of sustainable building designs and techniques; to reduce speculation in land and housing; and address issues associated with homelessness so that all people have shelter.
In recognition of the new section on Climate Change the KNB recommends that a new policy be added the climate change**

To ensure the safety of Oahu residents, protect shoreline property and Oahu’s beaches the shoreline setback should be increased

KNB recommends that the words centers be allowed to grow in an organic fashion, providing be deleted because it is unclear what constitutes an organic fashion or what is meant by centers. The wording should be replaced with the words areas provide after centers.

- Given the population distribution in the GP it is intended that rural centers areas provide centers be allowed to grow in an organic fashion, providing for generations to remain in their home towns and maintain the economic viability of our rural and suburban communities

KNB recommends that this statement be deleted because it is unclear what a “home to the wisdom of nations” is, what a “home to the wisdom of nations” looks like and what is required to be a “home to the wisdom of nations”.

New policies support age-friendly cities, and call for Honolulu to become home to the wisdom of nations, befitting its status as an international Pacific crossroads, and for encouraging outdoor learning opportunities and venues that utilize our unique natural environment and native culture.

KNB recommends that this paragraph be changed by deleting The City also add Government; delete importance of providing the need to provide. This change makes the objective active rather than passive.

The City also government recognizes the importance of providing need to provide adequate park space and facilities to keep up with changing demand.

KNB recommends that this language be deleted because it is too vague, lacks definition and differences between the various types of parks and more appropriately belongs in the Development/Sustainable Communities Plans.

New policies call for utilizing our unique natural environment in a responsible way to promote cultural events and activities, and for creating and promoting recreational venues for keiki and kupuna and for kama`aina and malahini

The General Plan is a critical planning document to all Hawaii residents. Public (open) meetings with city and county planners should occur on a regular interval schedule, not just at neighborhood board meetings to encourage full community participation.

To encourage broad community participation and greater interaction between residents and elected and government officials

- KNB recommends that neighborhood meetings be live streamed.
• KNB recommends that the following be deleted because the General Plan is a government directed growth plan that includes all types of participation. In addition, the private sector contributes significantly to Oahu’s economy as the primary leaders in development, construction and health care industries, thereby providing jobs and employment for many residents.

I. POPULATION

• KNB recommends that Objective A Policy 2 be deleted. It is unclear what is meant by adequate support facilities or how the islands tourist capacity will be determined without a carrying capacity study for the island. Provide adequate support facilities consistent with the island’s capacity to accommodate future growth in the number of visitors to Oahu.

• KNB recommends that the following new policy be included in the General Plan: It is the policy of the City and County of Honolulu to include funding in the City budget to support enforcement of the environmental, social, cultural, and economic objectives and policies of the General Plan.

• KNB recommends that the words to prevent urban sprawl be added after boundaries be inserted after boundaries in Policy 3:

Development is contained within growth boundaries: to prevent urban sprawl an undesirable spreading of development is prevented

If an objective of the General Plan is to direct growth and plan for anticipated population growth then why is the population reduced for the directed growth areas?

Residential population distribution

<table>
<thead>
<tr>
<th>Location</th>
<th>%</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary Urban Center</td>
<td>43%</td>
<td>46.0%</td>
</tr>
<tr>
<td>Ewa</td>
<td>16%</td>
<td>13%</td>
</tr>
<tr>
<td>Central Oahu</td>
<td>18%</td>
<td>1.7%</td>
</tr>
<tr>
<td>East Honolulu</td>
<td>5%</td>
<td>5.3%</td>
</tr>
<tr>
<td>Koolaupoko</td>
<td>10%</td>
<td>11.6%</td>
</tr>
<tr>
<td>Koolauloa</td>
<td>1%</td>
<td>1.4%</td>
</tr>
<tr>
<td>North Shore</td>
<td>2%</td>
<td>1.7%</td>
</tr>
<tr>
<td>Waianae</td>
<td>5%</td>
<td>4.0%</td>
</tr>
</tbody>
</table>

II. THE ECONOMY

Objective A – to promote economic employment opportunities that will enable all the people of Oahu to attain meaningful employment and a decent standard of living

• KNB recommends deleting the wording by reducing regulatory barriers that are burdensome, redundant, and costly to small businesses and in Policy 5. Such a broad and directive statement does not belong in the General Plan.

Policy 5 - Foster a healthy business climate by reducing regulatory barriers that are burdensome, redundant, and costly to small businesses and by encouraging complementary policies that support access to capital and markets and protection of the natural environment.
• KNB recommends that proposed Objective B Policy 10 be deleted to ensure communities remain residential for Oahu’s residents and to prevent the conversion of residential communities into defacto resorts. In addition a major part of the directed growth pattern for Oahu is the designation of resort areas. Policy 10 Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively

• KNB recommends that proposed Objective B Policy 3 be deleted
Policy 3 Guides the development and operation of visitor accommodations and attractions in a manner which avoids unsustainable increases in the cost of providing public services and which also respects existing lifestyles, cultural practices and natural and cultural resources

II. THE ECONOMY
Objective A – to promote economic employment opportunities that will enable all the people of Oahu to attain meaningful employment and a decent standard of living

• KNB recommends that Policy 5 be deleted. Such a statement does not belong in a land use, community-planning document.
   Policy 5 – foster a healthy business climate by reducing regulatory barriers that are burdensome, redundant, and costly to small businesses and by encouraging complementary policies that support access to capital and markets and protection of the natural environment

Objective B – To maintain a successful the viability of Oahu’s visitor industry that creates meaningful employment enhances quality of life and celebrates our unique sense of place, natural beauty, Native Hawaiian culture and multi-cultural heritage.

• KNB recommends that Policy 1 be deleted. The General Plan is a statement of long-range planning, social, environmental and economic goals and objectives and should not be involved with private businesses.
   Policy 1 – encourage the visitor industry to improve the quality of the visitor experience, the economic and social well-being of communities and the quality of life of residents.

• KNB recommends that the crossed through wording be deleted in Policy. Delete the word have and replace with of the. The sentence does not belong in the General Plan because the GP is a about long-range goals and objectives for Oahu’s residents and not about enriching the visitor experience.
   Policy 2 – respect and emphasize the value that of the Native Hawaiian culture and cultural practitioners and other established ethnic traditions bring to enriching the visitor experience.

• KNB recommends that the sentence support measures to ensure visitors safety in all areas of Oahu be deleted because such a statement does not belong in the Economy section and appears to only be concerned about the safety of tourists and not residents.
   Policy 5 – provide for a high quality and safe environment for visitors and residents in Waikiki and support measures to ensure visitors safety in all areas of
Oahu.

- KNB recommends that the words good quality of life for everyone on Oahu be added to Policy 9.
  Policy 9 - encourage physical improvements, social services and cultural programs that contribute to a high quality visitor experience **good quality of life for everyone on Oahu**.

- KNB recommends that Policy 10 be deleted because the General Plan is a long-range directed growth-planning document designed whose policies, objectives and goals are not driven by market demand.
  Policy 10 – permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively.

Objective C – To **ensure maintain the long-term viability and continued productivity of agriculture on Oahu.**

- KNB recommends that Policy 4 be deleted. Issues concerning regulations belong in Oahu’s Development/Sustainability Community Plans and other planning documents not the General Plan.
  Policy 4 – Remove overly-stringent and costly regulatory impediments that hinder a producer’s ability to develop, market and distribute locally grown food and products.

- KNB recommends that the original Policy 5 be retained in the General Plan because deletion doesn’t acknowledge the existence of small farms along the Windward, North Shore and Waianae coasts. Deleting these areas makes it seem like it is not an objective or policy to protect farms and farming along these coasts.
  Policy 5 – Maintain agricultural land along the Windward, North Shore, and Waianae coasts for truck farming, flower growing, aquaculture, livestock production and other types of diversified agriculture.

- KNB supports the prohibition against urbanizing agricultural land and recommends that it be a policy that all farms are protected from urbanization by deleting high quality and replacing it with **all**. In addition, high quality is subjective and does not belong in the General Plan.
  Policy 8 – Prohibit the urbanization of high value **all** agricultural land located outside the City’s growth boundaries.

Objective D – To **make full use of the economic resources of the sea in a sustainable manner.**

- KNB recommends that Policy 3 be deleted because ocean water activities are the responsibility of the state and do not belong in the General Plan.
  Policy 3 – Encourage the expansion of ocean recreation activities for residents and visitors.

- KNB recommends that a new policy be adopted to ensure that ocean resources are maintained in a sustainable manner.
  Implement the practice of resting coastal waters to allow replenishment of sea life.
and resources.

III. NATURAL ENVIRONMENT AND RESORUCE STEWARDSHIP
Objective A – To protect and preserve the natural environment

- **KNB recommends that the word incompatible be deleted in Objective A because it is subjective and infers that some types of development will be compatible.**

  Policy 1 – Protect Oahu’s natural environment, especially the shoreline, valleys, and watersheds, from incompatible development

- **KNB recommends that sea level rise be added after water-recharge areas, in Policy 4. This addition is in keeping with the new emphasis on climate change in the General Plan.**

  Policy 4 – Require development projects to give due consideration to natural features and hazards, such as slope, inland and coastal erosion and flood and erosion hazards, water-recharge areas, sea level rise distinctive land forms, and existing vegetation, as well as to plan for coastal hazards that threaten life and property.

Objective B – To preserve and enhance natural landmarks the natural monuments and scenic views of Oahu for the benefit of both residents and visitors.

- **KNB recommends the addition of including telecommunication and other tower in front of infrastructure in Objective B. This inclusion recognizes the proliferation of towers and their intrusion into Oahu’s scenic landscape**

  Policy 3 Locate and design public facilities, including telecommunication and other tower infrastructure and utilities to minimize the obstruction of scenic views.

VI. HOUSING AND COMMUNITIES

Objective A – To ensure a balanced mix of housing opportunities and choices for all residents are prices they can afford. To provide decent housing for all the people of Oahu at prices they can afford.

- **KNB recommends that Policy 2 be deleted because a statement about the permitting process does not belong in the General Plan.**

  Policy 2 – Streamline approval and permit procedures for housing and other development projects

- **KNB recommends that the word Encourage be deleted and replaced with Require in Policy 9. This change ensures that low and moderate-income housing is a priority and will be replaced.**

  Policy 9 – Encourage Require the replacement of low- and moderate-income housing in areas which are be redeveloped at higher densities

- **KNB recommends that Policy 12 be deleted because it infers that high-density transit oriented-development is needed, desired and planned for throughout the island, which is not the case.**

  Promote higher-density, mixed use development, including transit oriented development, to increase the supply of affordable and market homes convenient to
jobs, shops and public transit.

Objective B – To minimize reduce speculation in land and housing

• KNB recommends the words transit oriented-development (TOD) be added before areas delete surround; add near

Policy 5 – support mixed-use development and higher-density redevelopment in transit oriented-development (TOD) areas surround near future rail transit stations.

• KNB recommends that the word Discourage be replace with Prevent to ensure the safety of Oahu’s residents and protection of the environment in Policy 6.

Policy 6 – Discourage Prevent residential development in areas here the topography makes construction difficult or hazardous and where providing and maintaining roads, utilities, and other facilities would be extremely costly or environmentally damaging.

V. TRANSPORTATION AND UTILITIES

Objective A – To create a multi-modal transportation system which moves people and goods safely, efficiently and at a reasonable cost and minimizes fossil fuel consumption and greenhouse gas emissions; serves residents and visitors all users, including limited income, elderly and disabled populations; and is integrated with existing and planned development.

• KNB recommends that the word visitors and all users added be deleted from Objective.

• KNB recommends that Policy 5 be deleted because the rail transit system is already being built and TOD plans developed for TOD areas along the rail corridor so this policy does not need to be in the General Plan.

Policy 5 – Support the rail transit system as the transportation spine for the urban core, with links to the airport and cruise ship terminals, which will work together with transit oriented-development to reduce automobile dependency and increase multi-modal travel.

Objective D – To maintain transportation and utility systems, which support Oahu as a desirable place to live and visit.

• KNB recommends deleting the word Evaluate and replacing it with Develop a plan to prepare for… in Policy 5. This change acknowledges the inclusion of climate change in the General Plan and is an objective that can and must be met.

Policy 5 – Evaluate Develop a plan to prepare for impacts of sea level rise on existing public infrastructure, especially sewage treatment plants, roads, and other public and private utilities located along or near Oahu’s coastal areas.

VI. ENERGY

Objective A – To increase energy self-sufficiency and maintain an efficient, reliable, resilient and cost-efficient energy system.

• KNB recommends that any reference to geothermal energy be deleted in Policy 6 because while geothermal hotspots have been found in Waimanalo, Kailua/Kaneohe and Waianae there has never been any public discussion on
impacts to those communities and the environment from the exploration for and use of geothermal. Until the public has information on and is involved in discussions about the impacts geothermal it should not be in the General Plan as something to strive for.

Policy 6 – Support and participate in research, development, demonstration, and commercialization programs aimed at creating new, cost-effective and environmentally sound renewable energy supplies, including but not limited to:

a. solar energy,
b. biomass energy conversion;
c. wind energy conversion;
d. geothermal energy;
e. ocean wave energy;
f. ocean thermal energy conversion

Objective B – To conserve energy through the more efficient management of its use and through more energy-efficient technologies.

- KNB recommends that the words further progress in be deleted from Policy 4. The General Plan cannot dictate progress.
- KNB recommends that Policy 5 be deleted because not every community on Oahu is designed for urban development that blends residential, commercial, or industrial uses. Encouraging mixed-use development island wide violates Oahu’s General Plan directed growth policy.
  - Encourage the establishment of mixed-use town centers that are compatible with the physical and social character of their community.
- KNB recommends that Policy 6 be deleted because this Policy advocates transit-oriented-development around bus stops, which are considered transit stations throughout the island. The Policy conflicts with the General Plan directed growth policy as well as promoting TOD growth around rail stations.
  - Facilitate transient-oriented development in transit station areas to create live/work/play multi-modal communities that reduce travel and traffic congestion.
- KNB recommends that the word transit be deleted and replaced by the word rail. This change recognizes that transit-oriented-development belongs along the rail corridor and not in Oahu’s communities outside the rail corridor.

VII. PHYSICAL DEVELOPMENT AND URBAN DESIGN

Objective A – To coordinate changes in the physical environment of Oahu to ensure that all new developments are timely, well designed, and appropriate for the areas in which they will be located.

- KNB recommends that the new growth areas, redevelopment areas be defined in Policy 1. Inclusion of this information in the General Plan then identifies those areas are priorities for infrastructure improvements. It is unclear what that are with badly deteriorating infrastructure means or where it applies.

- KNB recommends that Policy 5 be deleted because not every community on Oahu is designed for urban development that blends residential, commercial, or industrial uses. Encouraging mixed-use development island wide violates Oahu’s General Plan directed growth policy.
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Policy 6 – Facilitate transient-oriented-development in transit rail station areas to create live/work/play multi-modal communities that reduce travel and traffic congestion.

Objective C – To develop the urban corridor stretching from Honolulu-Waialae-Kahala to Halawa, Aiea and Pearl City as the islands primary urban center.

- KNB recommends that Policy 3 be deleted because it infers that mixed-use districts can be created in rural and suburban communities where such urban development is not desired nor feasible
  
  Policy 3 – Encourage the establishment of mixed-use districts with appropriate design and development controls to ensure an attractive living environment and compatibility with surrounding land uses.

- KNB recommends that the words light industrial be added after office in Policy 6. This addition recognizes the language in HRS 206E identifies industrial as one of the needs in Kakaako.

Policy 6 Policy 9 – Facilitate the redevelopment of Kaka’ako as a major mixed-use residential, office, light industrial and commercial area that provides housing, jobs, recreational facilities, pedestrian safety, and other amenities and services that are needed by the areas residents and workers as well as commercial and light industrial.

Objective D

Objective C – To develop a secondary urban center in Ewa and its nucleus in the Kapolei area.

Objective D – To maintain those development characteristics in the urban-fringe and rural areas, which make them desirable places to live

- Is this Objective D deleted?

- KNB recommends that the words generally and to mid-low rise and to medium density be deleted in Policy 1. Urban fringe areas are not slated for population growth so there is no need to increase the height and density in the General Plan. If height and density increases are needed and desired that change should be evaluated in the Development/Sustainable Communities Plans.

  Policy 1 – Develop and maintain urban-fringe areas as predominantly residential areas characterized by generally low-to mid-rise, low-to medium density development which may include significant levels of retail and service commercial uses as well as satellite institutional and public uses geared to serving the needs of households

- The KNB recommends that the words Establish and be placed at the beginning of this policy to acknowledge that a greenbelt does not exist and that the creation and maintenance of a greenbelt is an objective for Ewa and Central Oahu in Policy 3.

  Policy 3 – Establish and Maintain a green belt system in the Ewa and Central Oahu areas of Oahu in the Development Plans

- KNB recommends that the word vibrant be deleted because it is subjective and infers that areas that are not exciting or not worth maintaining.

  Policy 4 – Maintain vibrant rural areas that reflect a relatively open and scenic
setting dominated by small to moderate size agricultural pursuits, with small towns of low density and low rise character and which allows for modest growth opportunities to address area residents future needs.

• KNB recommends that the word seek be deleted in Policy 5 to reflect that it is a guiding principle of the General Plan policy to protect resident’s quality of life. Policy 5 - Seek to protect resident’s quality of life and to maintain the integrity of neighborhoods by strengthening regulatory and enforcement strategies that address the presence of inappropriate non-residential activities.

Objective G Objective F – To promote and enhance the social and physical character of Oahu’s older towns and neighborhoods

• KNB recommends that the sentence promote vibrant community life and enhance livability be deleted and replaced with and promote livable communities. As it reads now only communities that are vibrant deserve support.

Policy 6 – Support and encourage cohesive neighborhoods, which foster interactions among neighbors, promote vibrant community life and enhance livability and promote livable communities.

VIII. PUBLIC SAFETY AND COMMUNITY RESILIENCE

Objective B – To protect residents and visitors residents of Oahu the people of Oahu and their property against natural disasters and other emergencies, traffic and fire hazards, and unsafe conditions

• KNB recommends that the words residents and visitors be deleted and replaced with residents of Oahu to reflect that the objective of the General Plan is to protect the property of Oahu resident’s.

• KNB recommends that the words and sea level rise be added after climate change in Policy 9

Policy 9 – Plan for the impacts of climate change and sea level rise on public safety, in order to minimize potential future hazards

X. CULTURE AND RECREATION

Objective A – To foster the multiethnic culture of Hawaii and respect the host culture of the Native Hawaiian people

• KNB recommends that the words Encourage the recognition be replaced with Recognize the... in Policy 1

Policy 1 – Encourage the recognition of Recognize the Native Hawaiian host culture, including its customs, language, history and close connection the natural environment as a dynamic, living culture and as an integral part of Oahu’s way of life

Objective D – To provide a wide range of recreational facilities and services that are readily available to all residents and visitors alike and that balances access to natural areas with the protection of those areas.
• KNB recommends that the new wording be deleted in Objective D. The Oahu General Plan is a long-range planning guidance document for Oahu residents and should be reflected as such.

• KNB recommends that the new language be deleted because it should not be a policy of the General Plan to advocate for more parks based on cumulative demand.
  
  Policy 2 – Develop, maintain and expand a system of regional parks and specialized recreation facilities based on the cumulative demand of residents and visitors.

• KNB recommends that Policy 13 be deleted because it is impossible to understand the differences between the various recreational venues. In addition the Oahu General Plan is to reflect the long-range aspirations of Oahu’s residents and not promote recreational venues for tourists.
  
  Policy 13 – Create and promote recreational venues for keiki and kupuna and for kama’aina and malahini.

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PHYSICAL DEV AND URBAN DESIGN

New policies emphasize the need to recognize and prepare for the long-term impacts of climate change.

The GP contains an objective on climate change and sea level rise. It calls for the public & private organizations to prepare for the future problems caused by rises in sea level, rises in groundwater levels, and more frequent and severe storms, shifts in local rainfall patterns, and higher urban temperatures.

• The KNB recommends that this section be deleted because it is confusing and unclear. Such as: what does “centers” refer too and how does a community grow in an “organic fashion?”

  Given the population distribution in the GP it is intended that rural centers be allowed to grow in an organic fashion, providing for generations to remain in their home towns and maintain the economic viability of our rural and suburban communities.
May 8, 2017

HHF Planners
ATTN: Oahu General Plan Update
Sent via email: gp2035@hhf.com

At the May 4, 2017 Kailua Neighborhood Board meeting the Board passed the following recommendation for the 2017 General Plan 2nd DRAFT.

The Kailua Neighborhood Board recommends that the entire Objective B and Policies be deleted from the General Plan Section V Transportation and Utilities and more appropriately added as a new Objective and Policies under Section III, Natural Environment and Resource Stewardship.

This change will help ensure that fresh water is considered and recognized as a natural public resource that must be treated in a sustainable manner.

This change helps to ensure that safe fresh public water is available to Oahu's residents now and in the future.

In addition this change helps ensure that a comprehensive and environmentally sound waste disposal system is appropriately addressed.

Sincerely,

Chuck Prentiss, Chair
At the April 6, 2017 Kailua Neighborhood Board the Board passed the following recommendations on the 2017 General Plan 2nd DRAFT.

The General Plan consists of general statements and objectives and policies for each of the 11 sections – population; economic activity; Natural Environment; Housing; Transportation and Utilities; Energy; Physical Development and Urban Design; Public Safety; Health and Education; Culture and Recreation; Government Operations and Fiscal Management.

Major changes proposed for the first time in the General Plan

- Transit-oriented-development (TOD) is proposed in several sections which means that TOD will not have to be connected to a rail line or rail station but can be developed around any bus stop, which is considered a transit station.
  - TOD is defined as a mixed-use residential and commercial area designed to maximize access to public transport. A typical TOD neighborhood has a center with a transit station or stop (train station, metro station or bus stop) surrounded by relatively high-density development with progressively lower-density development spreading outward from the center.
  
  TODs generally are located within a radius of ¼ to ½ mile from a transit stop.

- **KNB opposes detaching TOD from the Honolulu rail corridor and allowing TOD in every community throughout the island.**

- **KNB opposes the promotion of higher density and mixed-use development as a policy for all areas regardless if the community is rural or suburban and not in the district Development/Sustainable Communities Plans.**

- **KNB opposes changing the focus of the General Plan from directed growth areas of Honolulu to all of Oahu without much public discussion on the implications and ramifications of this drastic shift.**

  future growth of the metropolitan area of Honolulu to provide direction to accommodate the future growth projected for Oahu

- **KNB opposes allowing short-term vacation rentals in residential/apartment zoned non-resort areas. Simply using the consultant conclusion that there is a demand for vacation rentals is an insufficient basis for DPP to conclude that short-term**
vacation rentals are appropriate.

INTRODUCTION

- KNB recommends deletion of the new underlined language in #1 because it changes the focus of the General Plan from directing growth to the metropolitan area of Honolulu to the entire island.

- KNB recommends that the current language be retained.
  This planning process serves as the coordinative means by which the City and County government provides direction to accommodate the future growth projected for Oahu of the metropolitan area of Honolulu.

THE ECONOMY Pg. 9

- KNB recommends that the new policy in #17 be deleted because there is no definition of what a 21st century economy is, what it is suppose to promote or how it will accomplish the objectives of the General Plan.
  A new policy also promotes a 21st century economy that respects our traditional cultural values.

NATURAL ENVIRONMENT AND RESOURCE STEWARDSHIP Pg. 9

- KNB recommends that the sentences after community be deleted because this is a marketing statement not a planning policy and does not belong in the General Plan
  Protecting the island’s natural resources is essential to ensuring the long-term health and quality of life of the community. Besides an array of biologically-rich and diverse ecosystems, there are the year round mild and amiable climate, beautiful mountains, attractive beaches, scenic vistas, and freshwater and marine environments that are enjoyed by residents and visitors alike.

HOUSING AND COMMUNITIES Pg. 10.

- KNB recommends stat the last sentence in #19 be deleted because it is unclear what the objective is and what is meant by the statement that whole communities will be well integrated. Also, there is no definition of what constitutes a whole community.
  This section recognizes the importance of developing whole communities that are well integrated with the surrounding land uses and natural environment.

- KNB recommends that proposed #20 be deleted because it is too broad and implies that mixed-use and transit-oriented developments are desired and appropriate for all communities on Oahu, which of course is not the case.
  The objectives and policies for housing ensure a wide range of housing opportunities and choices; to increase the availability of affordable housing; higher-density housing via mixed use and transit-oriented developments; to increase the use of sustainable building designs and techniques; to reduce speculation in land and housing; and address issues associated with homelessness so that all people have shelter.
PHYSICAL DEVELOPMENT AND URBAN DESIGN Pg. 11

- In recognition of the new section on Climate Change the KNB recommends that a new policy be added the climate change**

  To ensure the safety of Oahu residents, protect shoreline property and Oahu’s beaches the shoreline setback should be increased

- KNB recommends that the words centers be allowed to grow in an organic fashion, providing be deleted because it is unclear what constitutes an organic fashion or what is meant by centers. The wording should be replaced with the words areas provide after centers.
  - Given the population distribution in the GP it is intended that rural centers areas provide centers be allowed to grow in an organic fashion, providing for generations to remain in their home towns and maintain the economic viability of our rural and suburban communities

HEALTH AND EDUCATION Pg. 12

- KNB recommends that this statement be deleted because it is unclear what a “home to the wisdom of nations” is, what a “home of the wisdom of nations” looks like and what is required to be a “home to the wisdom of nations”.
  - New policies support age-friendly cities, and call for Honolulu to become home to the wisdom of nations, befitting its status as an international Pacific crossroads, and for encouraging outdoor learning opportunities and venues that utilize our unique natural environment and native culture.

CULTURE AND RECREATION Pg. 13

- KNB recommends that this paragraph be changed by deleting The City also add Government; delete importance of providing the need to provide. This change makes the objective active rather than passive.
  - The City also government recognizes the importance of providing need to provide adequate park space and facilities to keep up with changing demand.
  - KNB recommends that this language be deleted because it is too vague, lacks definition and differences between the various types of parks and more appropriately belongs in the Development/Sustainable Communities Plans.
  - New policies call for utilizing our unique natural environment in a responsible way to promote cultural events and activities, and for creating and promoting recreational venues for keiki and kupuna and for kama‘aina and malahini

CITIZEN PARTICIPATION Pg. 15

- The General Plan is a critical planning document to all Hawaii residents. Public (open) meetings with city and county planners should occur on a regular interval schedule, not just at neighborhood board meetings to encourage full community participation.

- To encourage broad community participation and greater interaction between residents and elected and government officials
  - KNB recommends that neighborhood meetings be live streamed.
IMPELEMENTATION Pg. 17

- KNB recommends that the following be deleted because the General Plan is a government directed growth plan that includes all types of participation. In addition, the private sector contributes significantly to Oahu’s economy as the primary leaders in development, construction and health care industries, thereby providing jobs and employment for many residents.

I. POPULATION

- KNB recommends that Objective A Policy 2 be deleted. It is unclear what is meant by adequate support facilities or how the islands tourist capacity will be determined without a carrying capacity study for the island.

  Provide adequate support facilities consistent with the island's capacity to accommodate future growth in the number of visitors to Oahu.

- KNB recommends that the following new policy be included in the General Plan
  It is the policy of the City and County of Honolulu to include funding in the City budget to support enforcement of the environmental, social, cultural, and economic objectives and policies of the General Plan.

- KNB recommends that the words to prevent urban sprawl be added after boundaries be inserted after boundaries in Policy 3
  Development is contained within growth boundaries; to prevent urban sprawl an undesirable spreading of development is prevented.

If an objective of the General Plan is to direct growth and plan for anticipated population growth then why is the population reduced for the directed growth areas?

Residential population distribution

<table>
<thead>
<tr>
<th>Location</th>
<th>1980</th>
<th>1990</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary Urban Center</td>
<td>43%</td>
<td>46.0%</td>
</tr>
<tr>
<td>Ewa</td>
<td>16%</td>
<td>13%</td>
</tr>
<tr>
<td>Central Oahu</td>
<td>18%</td>
<td>17%</td>
</tr>
<tr>
<td>East Honolulu</td>
<td>5%</td>
<td>5.3%</td>
</tr>
<tr>
<td>Koolaupoko</td>
<td>10%</td>
<td>11.6%</td>
</tr>
<tr>
<td>Koolauloa</td>
<td>1%</td>
<td>1.4%</td>
</tr>
<tr>
<td>North Shore</td>
<td>2%</td>
<td>1.7%</td>
</tr>
<tr>
<td>Waianae</td>
<td>5%</td>
<td>4.0%</td>
</tr>
</tbody>
</table>

II. THE ECONOMY

Objective A – to promote economic employment opportunities that will enable all the people of Oahu to attain meaningful employment and a decent standard of living

- KNB recommends that Policy 5 be deleted. Such a statement does not belong in a land use, community-planning document.

  Policy 5 – foster a healthy business climate by reducing regulatory barriers that are burdensome, redundant, and costly to small businesses and by encouraging...
complementary policies that support access to capital and markets and protection of the natural environment.

Objective B – To maintain a successful visitor industry that creates meaningful employment, enhances quality of life, and celebrates our unique sense of place, natural beauty, Native Hawaiian culture, and multi-cultural heritage.

- KNB recommends that Policy 1 be deleted. The General Plan is a statement of long-range planning, social, environmental and economic goals and objectives and should not be involved with private businesses.
  
  Policy 1 – encourage the visitor industry to improve the quality of the visitor experience, the economic and social well-being of communities and the quality of life of residents.

- KNB recommends that the crossed through wording be deleted in Policy 2. Delete the word have and replace with of the. Delete bring to enriching the visitor experience because the GP is a about long-range goals and objectives for Oahu’s residents and not about enriching the visitor experience.
  
  Policy 2 – respect and emphasize the value that of the Native Hawaiian culture and cultural practitioners and other established ethnic traditions bring to enriching the visitor experience.

- KNB recommends that the sentence support measures to ensure visitors safety in all areas of Oahu in Policy 5 be deleted because such a statement does not belong in the Economy section and appears to only be concerned about the safety of tourists and not residents.
  
  Policy 5 – provide for a high quality and safe environment for visitors and residents in Waikiki and support measures to ensure visitors safety in all areas of Oahu.

- KNB recommends that the words good quality of life for everyone on Oahu be added to Policy 9.
  
  Policy 9 - encourage physical improvements, social services and cultural programs that contribute to a high quality visitor experience good quality of life for everyone on Oahu.

- KNB recommends that proposed Policy 10 be deleted to ensure that the General Plan remains true to its directed growth policy by ensuring that residential communities remain residential for Oahu’s residents and to prevent the conversion of residential communities into defacto resorts. The General Plan is a long-range directed growth-planning document whose policies, objectives and goals are not driven by market demand.

  In addition a major part of the directed growth pattern for Oahu is the designation of resort areas.
Policy 10 – Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively.

Objective C – To ensure maintain the long-term viability and continued productivity of agriculture on Oahu.

- KNB recommends that Policy 4 be deleted. Issues concerning regulations belong in Oahu’s Development/Sustainability Community Plans and other planning documents not the General Plan.
  Policy 4 – Remove overly-stringent and costly regulatory impediments that hinder a producer’s ability to develop, market and distribute locally grown food and products.

- KNB recommends that the original Policy 5 be retained in the General Plan because deletion doesn’t acknowledge the existence of small farms along the Windward, North Shore and Waianae coasts. Deleting these areas makes it seem like it is not an objective or policy to protect farms and farming along these coasts.
  Policy 5 – Maintain agricultural land along the Windward, North Shore, and Waianae coasts for truck farming, flower growing, aquaculture, livestock production and other types of diversified agriculture.

- KNB supports the prohibition against urbanizing agricultural land and recommends that it be a policy that all farms are protected from urbanization by deleting high quality and replacing it with all. In addition, high quality is subjective and does not belong in the General Plan.
  Policy 8 – Prohibit the urbanization of high-value all agricultural land located outside the City’s growth boundaries.

Objective D – To make full use of the economic resources of the sea in a sustainable manner.

- KNB recommends that Policy 3 be deleted because ocean water activities are the responsibility of the state and do not belong in the General Plan.
  Policy 3 – Encourage the expansion of ocean recreation activities for residents and visitors.

- KNB recommends that a new policy be adopted to ensure that ocean resources are maintained in a sustainable manner.
  Implement the practice of resting coastal waters to allow replenishment of sea life and resources.

III. NATURAL ENVIRONMENT AND RESORUCE STEWARDSHIP
Objective A – To protect and preserve the natural environment.

- KNB recommends that the word incompatible be deleted in Policy 1 because it is subjective and infers that some types of development will be compatible.
  Policy 1 – Protect Oahu’s natural environment, especially the shoreline, valleys, and watersheds, from incompatible development.
• KNB recommends that sea level rise be added after water-recharge areas in Policy 4. This addition is in keeping with the new emphasis on climate change in the General Plan.
  Policy 4 – Require development projects to give due consideration to natural features and hazards, such as slope, inland and coastal erosion and flood and erosion hazards, water-recharge areas, sea level rise distinctive land forms, and existing vegetation, as well as to plan for coastal hazards that threaten life and property.

Objective B – To preserve and enhance natural landmarks the natural monuments and scenic views of Oahu for the benefit of both residents and visitors.

• KNB recommends the addition of including telecommunication and other tower in front of infrastructure in Policy 3. This inclusion recognizes the proliferation of towers and their intrusion into Oahu’s scenic landscape
  Policy 3 Locate and design public facilities, including telecommunication and other tower infrastructure and utilities to minimize the obstruction of scenic views.

VI. HOUSING AND COMMUNITIES
Objective A – To ensure a balanced mix of housing opportunities and choices for all residents are prices they can afford. To provide decent housing for all the people of Oahu at prices they can afford.

• KNB recommends that Policy 2 be deleted because a statement about the permitting process does not belong in the General Plan.
  Policy 2 – Streamline approval and permit procedures for housing and other development projects

• KNB recommends that the word Encourage be deleted and replaced with Require in Policy 9. This change ensures that low and moderate-income housing is a priority and will be replaced.
  Policy 9 – Encourage Require the replacement of low- and moderate-income housing in areas which are to be redeveloped at higher densities

• KNB recommends that Policy 12 be deleted because it infers that high-density transit oriented-development is needed, desired and planned for throughout the island, which is not the case.
  Promote higher-density, mixed-use development, including transit oriented development, to increase the supply of affordable and market homes convenient to jobs, shops and public transit.

Objective B – To minimize reduce speculation in land and housing

• KNB recommends the words transit oriented-development (TOD) be added before areas delete surround; add near
  Policy 5 – support mixed-use development and higher-density redevelopment in transit oriented-development (TOD) areas surround near future rail transit stations.
- KNB recommends that the word Discourage in Policy 6 be replaced with Prevent to ensure the safety of Oahu’s residents and protection of the environment in Policy 6.

  Policy 6 – Discourage Prevent residential development in areas where the topography makes construction difficult or hazardous and where providing and maintaining roads, utilities, and other facilities would be extremely costly or environmentally damaging.

V. TRANSPORTATION AND UTILITIES

Objective A – To create a multi-modal transportation system which moves people and goods safely, efficiently and at a reasonable cost and minimizes fossil fuel consumption and greenhouse gas emissions; serves residents and visitors all users, including limited income, elderly and disabled populations; and is integrated with existing and planned development.

- KNB recommends that the word visitors be deleted and all users added to Objective A.

- KNB recommends that Policy 5 be deleted because the rail transit system is already being built and TOD plans have been or are being developed for TOD areas along the rail corridor so this policy does not need to be in the General Plan.

  Policy 5 – Support the rail transit system as the transportation spine for the urban core, with links to the airport and cruise ship terminals, which will work together with transit oriented development to reduce automobile dependency and increase multi-modal travel.

Objective D – To maintain transportation and utility systems, which support Oahu as a desirable place to live and visit.

- KNB recommends deleting the word Evaluate and replacing it with Develop a plan to prepare for... in Policy 5. This change acknowledges the inclusion of climate change in the General Plan and is an objective that can and must be met.

  Policy 5 – Evaluate Develop a plan to prepare for impacts of sea level rise on existing public infrastructure, especially sewage treatment plants, roads, and other public and private utilities located along or near Oahu’s coastal areas.

VI. ENERGY

Objective A – To increase energy self-sufficiency and maintain an efficient, reliable, resilient and cost-efficient energy system.

- KNB recommends that any reference to geothermal energy be deleted in Policy 6 because while geothermal hotspots have been found in Waimanalo, Kailua/Kaneohe and Waianae there has never been any public discussion on impacts to those communities and the environment from the exploration for and use of geothermal. Until the public has information on and is involved in the planning for and discussions about the impacts from geothermal extraction and use it should not be in the General Plan.

  Policy 6 – Support and participate in research, development, demonstration, and
commercialization programs aimed at creating new, cost-effective and environmentally sound renewable energy supplies, including but not limited to:

- a. solar energy,
- b. biomass energy conversion;
- c. wind energy conversion;
- d. geothermal energy;
- e. ocean wave energy;
- f. ocean thermal energy conversion

**Objective B** – To conserve energy through the more efficient management of its use and through more energy-efficient technologies.

- **KNB recommends that the words further progress in be deleted from Policy 4.**
  - The General Plan cannot dictate progress.
  - Policy 4: Promote further progress in the development of a multi-modal transportation system that minimizes fossil fuel consumption and greenhouse gas emissions.

**VII. PHYSICAL DEVELOPMENT AND URBAN DESIGN**

**Objective A** – To coordinate changes in the physical environment of Oahu to ensure that all new developments are timely, well designed, and appropriate for the areas in which they will be located.

- **KNB recommends that the new growth areas, redevelopment areas in Policy 1 be defined and identified in the General Plan.**
  - Thus, ensuring that the identified areas are considered infrastructure improvements priorities. The wording areas with badly deteriorating infrastructure should be deleted because it is too broad and subjective.

- **KNB recommends that Policy 5 be deleted because not every community on Oahu is designed for urban development that blends residential, commercial, or industrial uses.**
  - Encouraging mixed-use development island wide violates Oahu's General Plan directed growth policy.
  - Encourage the establishment of mixed-use town centers that are compatible with the physical and social character of their community.

- **KNB recommends that Policy 6 be deleted because this Policy advocates transit-oriented-development around bus stops, which are considered transit stations throughout the island.**
  - The Policy conflicts with the General Plan directed growth policy as well as promoting TOD growth around rail stations.
  - Facilitate transit-oriented development in transit station areas to create live/work/play multi-modal communities that reduce travel and traffic congestion.

- **KNB recommends that the word transit be deleted and replaced by the word rail;**
  - this change recognizes that transit-oriented-development (TOD) belongs along the rail corridor and not in Oahu's communities outside the rail corridor.

  *Policy 6* – Facilitate transit-oriented-development in transit rail station areas to create live/work/play multi-modal communities that reduce travel and traffic congestion.
Objective C – To develop the urban corridor stretching from Honolulu-Waialae-Kahala to Halawa, Aiea and Pearl City as the islands primary urban center.

- KNB recommends that Policy 3 be deleted because it infers that mixed-use districts can be created in rural and suburban communities where such urban development is not desired nor feasible.
  
  Policy 3 – Encourage the establishment of mixed use districts with appropriate design and development controls to ensure an attractive living environment and compatibility with surrounding land uses.

- KNB recommends that the words light industrial be added after office in Policy 6. This addition recognizes the language in HRS 206E identifies industrial as one of the needs in Kakaako.
  
  Policy 6 Policy 9 – Facilitate the redevelopment of Kaka’ako as a major mixed-use residential, office, light industrial and commercial area that provides housing, jobs, recreational facilities, pedestrian safety, and other amenities and services that are needed by the areas residents and workers as well as commercial and light industrial.

Objective D – To develop a secondary urban center in Ewa and its nucleus in the Kapolei area.

Objective D – To maintain those development characteristics in the urban-fringe and rural areas, which make them desirable places to live.

- KNB recommends that the words generally and to mid-low rise and to medium density be deleted in Policy 1. Urban fringe areas are not slated for population growth so there is no need to increase the height and density in the General Plan. If height and density increases are needed and desired that change should be evaluated in the Development/Sustainable Communities Plans.
  
  Policy 1 – Develop and maintain urban-fringe areas as predominantly residential areas characterized by generally low-to mid-rise, low-to medium density development which may include significant levels of retail and service commercial uses as well as satellite institutional and public uses geared to serving the needs of households.

- The KNB recommends that the words Establish and be placed at the beginning of this policy to acknowledge that a greenbelt does not exist and that the creation and maintenance of a greenbelt is an objective for Ewa and Central Oahu in Policy 3.
  
  Policy 3 – Establish and Maintain Establish a green belt system in the Ewa and Central Oahu areas of Oahu in the Development Plans.

- KNB recommends that the word vibrant be deleted because it is subjective and infers that areas that are not exciting or not worth maintaining.
  
  Policy 4 – Maintain vibrant rural areas that reflect a relatively open and scenic setting dominated by small to moderate size agricultural pursuits, with small towns of low density and low rise character and which allows for modest growth opportunities to address area residents future needs.
• KNB recommends that the word seek be deleted in Policy 5 to reflect that it is a
   guiding principle of the General Plan policy to protect resident’s quality of life.
   Policy 5 - Seek to protect resident’s quality of life and to maintain the integrity of
   neighborhoods by strengthening regulatory and enforcement strategies that
   address the presence of inappropriate non-residential activities.

Objective G – To promote and enhance the social and physical character of Oahu’s older
towns and neighborhoods

• KNB recommends that the sentence promote vibrant community life and
  enhance livability in Policy 6 be deleted and replaced with and promote livable
  communities. As it reads now only communities that are vibrant deserve
  support.
  Policy 6 – Support and encourage cohesive neighborhoods, which foster
  interactions among neighbors, promote vibrant community life and enhance
  livability and promote livable communities.

VIII. PUBLIC SAFETY AND COMMUNITY RESILIENCE
Objective B – To protect residents and visitors residents of Oahu the people of Oahu and their
property against natural disasters and other emergencies, traffic and fire hazards, and unsafe
conditions

• KNB recommends that the words residents and visitors be deleted in Objective
  B and replaced with residents of Oahu to reflect that the objective of the General
  Plan is to protect the property of Oahu resident’s.

• KNB recommends that the words and sea level rise be added after climate change
  in Policy 9
  Policy 9 – Plan for the impacts of climate change and sea level rise on public
  safety, in order to minimize potential future hazards

X. CULTURE AND RECREATION
Objective A – To foster the multiethnic culture of Hawaii and respect the host culture of the
Native Hawaiian people

• KNB recommends that the words Encourage the recognition be replaced with
  Recognize the...in Policy 1
  Policy 1 – Encourage the recognition of Recognize the Native Hawaiian host
culture, including its customs, language, history and close connection the natural
environment as a dynamic, living culture and as an integral part of Oahu’s way of
life

Objective D – To provide a wide range of recreational facilities and services that are readily
available to all residents and visitors alike and that balances access to natural areas with the
protection of those areas.

• KNB recommends that the new wording be deleted in Objective D. The Oahu
  General Plan is a long-range planning guidance document for Oahu residents
  and should be reflected as such.
• KNB recommends that the new language be deleted because it should not be a policy of the General Plan to advocate for more parks based on cumulative demand.
  Policy 2 – Develop, maintain and expand a system of regional parks and specialized recreation facilities based on the cumulative demand of residents and visitors.

• KNB recommends that Policy 13 be deleted because it is impossible to understand the differences between the various recreational venues. In addition the Oahu General Plan is to reflect the long-range aspirations of Oahu’s residents and not promote recreational venues for tourists.
  Policy 13 – Create and promote recreational venues for keiki and kupuna and for kama`aina and malahini.
To:  2035 O‘ahu General Plan  
c/o Helber Hastert & Fee, Planners  
733 Bishop Street, Suite 2590  
Honolulu, Hawaii 96813

From:  Mahealani Cypher  
Planning Committee Chairperson  
Kaneohe Neighborhood Board No. 30

Re:  Comments on the O‘ahu General Plan Concerning Ko‘olaupoko

Aloha, Members of the City’s Planning Team and fellow community members:

On behalf of the Kaneohe Neighborhood Board No. 30, I wish to present to you our comments regarding the Ko‘olaupoko Sustainable Communities Plan, indicated on the attachment.

While this meeting is primarily about the islandwide General Plan, we feel it is important that we advocate for the goals, wishes and concerns of our Windward district as we anticipate what may be approved in the overall plan for the island.

As a community that has long been deeply interested in and concerned about the future of Ko‘olaupoko and Kane‘ohe in particular, we realize that what is adopted as the overall General Plan for our island can have significant impacts on our own community.

We offer conditional support for the recommendations of the City Planning & Permitting Department, but have shared some of the concerns raised by our community

Mahalo for this opportunity to offer our comments.
Subject: Comments of the Kaneohe Neighborhood Board #30 on the Ko`olaupoko Sustainable Communities Plan

Concerning the Ko`olaupoko Sustainable Communities Plan

We support the Honolulu Planning & Permitting Department’s April 2016 Ko`olaupoko Sustainable Communities Plan because it preserves the current urban areas and limits future growth for the district of Ko`olaupoko and the communities of Kane`ohe, in particular.

Although we support the plan’s general concepts, the Kane`ohe Neighborhood Board and its Permitted Interaction Group have received the following community concerns which we, the members of the Kane`ohe Neighborhood Board, feel should be addressed before final approval by the Honolulu City Council:

Key Elements

1. Sustainability: the Plan does not adequately address efforts to ensure food, water and shelter sustainability for the region. There is insufficient discussion in the Transportation or Public Safety sections regarding mitigating sea-level rise impacts on Kamehameha Highway and coastal areas of Ko`olaupoko, including realignment as needed.

2. Impact of highway expansion on growth: the widening of Kahekili Highway remains a significant concern due to anticipated adverse impacts on the Windward coast, including farm lands, cultural resources and near-shore waters and the natural environment; and the expectation that growth generated by the widening of Kahekili and eventually Kamehameha Highways would lead to overloading Kahekili once more, leading to the same or worse traffic congestion.

Open Space Preservation

3. Wailele o Ko`olau development: concern was raised over the impact on farmlands and conservation (watershed) areas, view planes mauka to makai, and adverse impact on traffic congestion in the area.

4. Hawaiian Memorial Park expansion: some community members object to amending the growth boundary to accommodate HMP’s proposed expansion; others asked for clarification regarding “above-grade” structures – how is this defined?

5. Open space preservation policy should include support for public education, interpretation and access consistent with the primary objectives of the preserved area.
6. Greenways: concerns raised regarding potential pollution of streams by those using greenways, and security issues for adjoining homes and businesses.

**Parks and Recreation**

7. Waikane Nature Preserve: concern was raised regarding unexploded ordnance in the area.

8. Park dedication fee should not be the preferred option for new development; developers should be required to construct the park concurrently with their development.

9. Page 5.16  Prepare wildlife preserve management plans emphasizing conservation and restoration of native plants, birds, fish and invertebrates including public education, interpretation and access and other recreational and management objectives consistent with the primary objectives of the preserve.

**Historic and Cultural Resources**

10. In Section 3.3 – Historic and Cultural Resources – we ask that you add to the list of structural landmarks identified with the history of the region the following two important historic structures:
    a. OMEGA Station in Haiku Valley
    b. Haiku Stairs

**Agricultural Use**

11. Appendix V: exception on farmlands adjacent to developed areas can adversely affect protection of those agricultural lands. Plan should ensure adequate buffer acreage between agricultural and residential development to address potential adverse effects for either farms (which use fertilizers or raise animals) and residential properties, which may encroach and eventually force out agricultural lands.: Reference A-5 Ag Areas in the country district, except those parcels immediately adjoining a residential district lying within the Community Growth Boundary; *This allows gradual elimination of ag land by “straightening” the CGB.*

**Military Uses**

12. The Plan does not adequately address the adverse impacts of military land use, activities and presence in the region or suggest solutions to those impacts.
Transportation Systems

(see #2 above)

Water Systems

13. Minimum stream flows: the Plan does not address ensuring minimum stream flows for streams in Ko’olaupoko region or Kane’ohe bay area; City needs to identify streams in the district that are important for ensuring healthy habitats for estuaries.
14. Where possible channelizing should be avoided and where it is necessary Channeling should mimic the natural stream flow and incorporate landscaping to minimize advert visual impacts. Non-point source pollution is addressed in Sec 3.1..3.4 on page 5/16

Electrical and Communications Systems

15. Overhead wiring: residents remain concerned about overhead wiring and exposure to damage from high winds; and adverse impact on viewplanes mauka to makai.

16. Wi-Fi: free wi-fi service is needed throughout the Kane’ohe town area (from Windward City to Haiku Road), to ensure adequate communications in times of disaster. There is also a critical need to ensure backup power for communications systems in case of power outages.

Solid Waste Handling and Disposal

17. Recycling Centers: With the goal of eliminating landfills and to the extent possible, all solid waste should be processed within the sustainable community district, and transportation of solid waste should be minimized. The technology exists today and is used in other communities to have recycling centers. Also suggested: Each of the SCPs should include district recycling centers which would receive and process all trash collected from within that district, to make them ready for re-use or sale.

Drainage Systems

18. Designated agency to manage irrigation ditches or abandoned reservoirs: no new agency is needed, this should be assigned to existing agencies.
Civic and Public Safety Facilities and Community Resilience

19. Homeless shelters: issue is not adequately addressed in the Plan; there are significant numbers of homeless individuals and families in the Ko’olaupoko district.

20. Maintenance of channelized streams: Plan needs to address adequate access for regular maintenance of channelized streams.

21. Civil Defense/Department of Emergency Management: Plan should establish a policy for ensuring adequate emergency shelter management staffing and training. Specifically: City employees should be trained and assigned responsibility for managing shelters.

22. Civil Defense/DEM: The city Department of Emergency Management expects citizen volunteers to create local community resilience plans. This is beyond the capability of volunteers. DEM should push community resilience planning to the community level with funding sufficient to conduct community inventories and create mobilization plans.

Implementation

23. Exceptions to the General Plan, Sustainable Communities Plans and Development Plans: residents complained that there are frequent exceptions to these plans, that are granted by city agencies or the City Council, which is a major concern to the community. Can language include safeguards to address trade-offs to preserve carrying capacities of each SCP area?
Aloha mai,

Attached please find the Resolution regarding the O‘ahu General Plan approved by the Kuli‘ou‘ou / Kalani Iki Neighborhood Board No. 2 on April 6, 2017. I gave a copy to Mr. Tim Hata last night at the Hawai‘i Kai Neighborhood No. 1 Environment and Planning and Zoning meeting.

Mahalo,

Jeannine

Jeannine Johnson

A

The past teaches; the present motivates; the future inspires.
Resolution re O‘ahu General Plan

WHEREAS, the O‘ahu General Plan is currently in its Second Public Review Draft. There are proposed revisions that allow short-term vacation rentals in TOD (transient-oriented-development), permits small-scale community-oriented visitor accommodations in non-resort areas, and call for utilizing our unique natural environment by creating and promoting recreational venues for keiki and kupuna and for kama‘aina and malahini (tourists/visitors). There are different terms used in Hawai‘i to identify short term vacation rentals, including TVRs, TVUs, IVUs, and VRUs.

WHEREAS, the East Honolulu Sustainable Communities Plan (EHSCP) mandates long-term protection of community, natural and scenic resources and the preservation of cultural and historical resources.

WHEREAS, when the City and County of Honolulu "grandfathered" (legalized) existing B&Bs and TVRs in 1989, it put a limit on operations over a concern about their proliferation and impact on residential communities. There are 826 legal TVRs and only 49 legal B&Bs on O‘ahu. TVRs are only legally allowed in resort districts, such as Ko ‘Olina, Turtle Bay and Waikiki. According to the Hawai‘i Tourism Authority (HTA) 2016 Visitor Plant Inventory Report, the number of visitor units on O‘ahu increased (+3.7%) to 37,400 in 2016. The increase was driven by the growth of TVRs.

WHEREAS, in 2008, there were an estimated 1,200 TVRs being operated illegally on O‘ahu. In 2010, the Department of Planning and Permitting (DPP) issued violation notices to only 18 property owners although it had 749 investigations into TVR and B&B complaints. In 2015, the DPP issued only 37 violation notices although the number of illegal TVRs on O‘ahu were estimated between 4,000 and 5,000. Therefore TVRs are basically an unregulated commercial industry, with violators unprosecuted or given reduced “negotiated” fines only 5% after years of complaints by neighbors making their criminal activity much too lucrative to stop.

WHEREAS, the number of tourists have exploded and reached nearly 9 million in 2016 and Hawai‘i has reached the point of saturation and visitor overdose. With only one resident to six tourists, vacationers have overrun our beaches, parks and recreational resources, as well as strangled our roads with traffic, depleted our precious wai or water supply, and created a long-term rental housing crunch. This enticement of tourists to stay in our residential neighborhoods instead of in designated resort areas has been called “local cleansing” because affluent part-time or offshore owners who can afford to buy investment properties remove their profits off-island unlike our hotel industry.

WHEREAS, from 2015 to 2016, online accommodations seller Airbnb alone expanded exponentially on O‘ahu adding 6,804 units (+93%). A report issued on November 8, 2016 for the Hawai‘i Tourism Authority estimates over 27,000 vacation rentals in the state are advertised online with an overwhelming number of them illegal. The report also confirmed that 34,402 (or 69.7%) of all the properties were owned by persons who reside outside of Hawai‘i and only 30% of the properties were owned by Hawai‘i residents.

WHEREAS, a study by American Hotel and Lodging Association looked at the AirBnB bookings in major cities across the country and found that most of the rentals are not small home operators renting out spare rooms. It stated 85% of the O‘ahu revenue is from the rental of entire homes to AirBnB visitors and was second only to Nashville. “The new study by the American Hotel and Lodge Association shows a trend that has become increasingly clear to city officials – illegal short-term rentals place a burden on O‘ahu’s residential neighborhoods,” Mayor Kirk Caldwell said in a Star Advertiser story on March 19, 2017.
WHEREAS, a recent report by the state Department of Economic Development & Tourism determined that Hawai‘i will need 65,000 more homes by 2025. A Hawai‘i Housing Finance and Development Corporation 2014 report indicated an alarming drop in rental listings over the last three years for both multi-family and single-family units on all islands with the military and the visitor industry absorbing a large share of the rental housing stock on mainly Oahu. Every home used illegally as a visitor lodging business is one less home for our residents and has created a long-term housing crunch.

WHEREAS, on November 6, 2008, the Kuli‘ou‘ou/Kalani Iki Neighborhood Board No. 2 determined that TVRs and small-scale community-oriented visitor accommodations should not be proposed in our residential communities. TVRs are commercial businesses which have no place in our residential neighborhoods. They negatively impact our neighborhoods by increasing property values and making long-term rentals for locals harder to find. Visitors arrive at all hours of the night inconveniencing their neighbors as well as disturb their sleep with noise from parties, damaging the quiet character of neighbors and impairing the safety of communities with increased traffic and parking problems.

WHEREAS, the Kuli‘ou‘ou/Kalani Iki Neighborhood Board No. 2 also determined that TVRs disintegrate the urban fabric of our well-established neighborhoods, increased homelessness by decreasing available rental market and created a highly speculative housing market that out-priced local buyers in favor of wealthy non-residents. Illegal TVRs also usurped the value of our cultures (Hawaiian and local-style) without giving anything back unlike our tourist industry. Therefor the Kuli‘ou‘ou/Kalani Iki Neighborhood Board No. 2 unanimously passed a Resolution "compelling the DPP to enforce the laws against illegal TVRs and B&Bs and oppose the legalization of TVRs and B&Bs in Oahu’s residential neighborhoods."

WHEREAS, due to pressures from illegal B&B and TVR operators making thousands of dollars in illicit income, the City Council has introduced, again and again, bills to legalize TVRs. However, because it’s so important for Oahu to protect our residential housing supply and preserve the character of our residentially zoned neighborhoods and communities, the Honolulu City Council, Planning Commission, Kuli‘ou‘ou/Kalani Iki Neighborhood Board No. 2, Waialae/Kahala Neighborhood Board No. 3, Diamond Head/Kapahulu/St. Louis Neighborhood Board No. 5, Waianae Neighborhood Board No. 24, North Shore Neighborhood Board No. 27, Koolauloa Neighborhood Board No. 28, Kailua Neighborhood Board No. 31, Waimanalo Neighborhood Board No. 32, ILWU Local 142, Unite Here Local 5 AFL-CIO, Hawaii, League of Women Voters-Honolulu, The Institute for Human Services, Punalu‘u Community Association, Waimanalo Beach Lots Association, Livable Hawaii Kai Hui, Save Oahu’s Neighborhoods Hawaii, Lanikai Community Association, American Hotel and Lodging Association and the majority of O‘ahu residents oppose the expansion of transient visitor accommodations in residential zoning.

WHEREAS, the number of tourists have exploded and reached nearly 9 million in 2016 and Hawaii has reached the point of saturation and visitor overdose. With only one resident to every six tourists, vacationers are overrunning our beaches, parks and recreational resources, as well as strangling our roads with traffic, depleting our precious wai or water supply, and created a long-term rental housing crunch. This enticement of tourists to stay in our residential neighborhoods instead of in designated resort areas has been called a version of “local cleansing” because affluent part-time or offshore owners who can afford to buy investment properties remove their profits off-island unlike our hotel industry.

WHEREAS, on April 4, 2014, the Kuli‘ou‘ou/Kalani Iki Neighborhood Board No. 2 unanimously adopted the following Resolution “That the Kuli‘ou‘ou/Kalani Iki Neighborhood Board No. 2 opposes the General Plan’s Proposed Economy Policy 10 including community hotels and alternative lodging as well as the legalization of B&Bs and TVUs in Oahu’s residential neighborhoods. The Board requests that the DPP enforce the law against illegal B&Bs and TVUs."

NOW, THEREFORE, BE IT RESOLVED that the Kuli‘ou‘ou/Kalani Iki Neighborhood Board No. 2 strongly objects to any proposed revisions in the Oahu General Plan that allow TVRs in TOD or anywhere, permits any visitor accommodations in non-resort areas, and would utilize our unique natural environment which should stay natural.

NOW THEREFORE, BE IT FURTHER RESOLVED that copies of this Resolution be transmitted to the Governor of the State of Hawai‘i, the Mayor of the City and County of Honolulu, the Honolulu City Council, and other proper agencies.
DATE OF INTRODUCTION: April 6, 2017

Adopted by the Kuli’ou’ou/Kalani Iki Neighborhood Board No. 2 at its regular meeting of April 6, 2017 by a vote of 12—2—1.
May 4, 2017

Kathy Sokugawa
Acting Director
Department of Planning and Permitting
650 S. King St
Honolulu, HI  96813
RE: Oahu General Plan – North Shore Neighborhood Board Comment

Aloha Acting Director Sokugawa:

At a Special Board Meeting held on April 25, 2017, the North Shore Neighborhood Board supported a motion to have our elected officials look at putting a cap on tourism numbers based on our island’s carrying capacity. There was strong sentiment that we are putting too much emphasis on the visitor over the resident. This is evident in the revised language in the plan that now includes the visitor as co-equal with the resident.

Too many of our beaches, parks, natural attractions are being stressed and the current infrastructure is inadequate to handle the increasing numbers. The North Shore definitely is not ready to accommodate more visitors much less the projected population growth.

Mahalo for your time and consideration of our concerns.

Kathleen M. Pahinui
Chair, North Shore Neighborhood Board #27
Aloha e Chair Paaluhi,
Mahalo nui for representing Waianae on the Oahu General Plan. Looking forward in attending your Housing and Development committee meeting this Thursday.

On Tue, May 9, 2017 at 12:01 AM, Marc Paaluhi wrote:

Aloha kākou,
I am sending this email with deep concern. My concern is for the future of this beautiful 'Aina that our people have been stewards of for generations. As you may or may not have known, on Thursday I joined in a conversation to discuss the current draft of the Oahu General Plan with other concerned individuals. The majority of this group comprised of neighborhood board members hailing from different communities on Oahu. Though our communities differ in

Marc Kalai Pa'aluh'i
Wai'anae Coast Neighborhood Board CHAIR
Organizations
The Aina Haina Community Association (AHCA) writes in opposition to the proposed Policy 10. DPP has been totally unable to enforce the current residential zoning laws.

The Board of Directors of AHCA is opposed to any measure that would legitimize or permit commercial lodging facilities in residentially-zoned neighborhoods and which take units out of the long-term residential housing market.

Commercial businesses simply do not belong in residentially-zoned neighborhoods. People expect their neighborhoods to be quiet and safe. Vacationers on the other hand, have no responsibility to be good neighbors; they are on vacation and expect to have a good time. They have no incentive to be quiet and to respect the rights of neighbors. Their vacations are more appropriately spent at a hotel or resort-zoned properties where proper accommodations are available for people on vacation. Honolulu has ample vacation and resort areas which are run by travel professionals specifically for the tourist market.

There are numerous illegally operating transient vacation units (TVU’s) in our neighborhoods. These units contribute to our housing shortage and the escalating prices of homes. As prices escalate, owners will be forced into becoming landlords instead of homeowners. TVU’s are also detrimental to our neighborhoods because owners are not required to reside on the property.

One ocean front home in our community was rented by a group of 20 people. The neighbors had complained about the home for two years before any action was taken. Since these owners show no respect for our laws, they will ignore regulations as well.

Owners are not required to reside on site, they are not affected by the excessive noise, increased traffic, the number of additional cars parked on the street, or the presence of strangers in a residential community. They are interested in one thing only: maximizing rental income on their property. In some cases, vacation renters take up so much of the on-street parking that residents must park across the highway.

Residential use cannot compete with the high rents that owners can charge tourists for vacation rentals.

Any proposed policy must increase the enforcement capacity of the City Department of Planning and Permitting, which has been unable to enforcement current zoning laws and effectively close illegal rentals currently operating in our neighborhoods. Too much of the burden of identifying illegal businesses has been placed on neighbors.

AHCA respectfully requests that more efforts be made to enforce our current residential zoning laws.

Jeanne Ohta
President, Aina Haina Community Association
To Whom it May Concern, Please dont add to the illegal vacation rental problem. The city has zero enforcement power and our neighborhoods are already gone. Our resources are stretched beyond capacity and all HTA does is bring more and more people with no infrastructure.

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May 7, 2017

To: C&C of Honolulu Department of Planning & Permitting / OGP Consultants

From: Defend Oahu Coalition Board

Re: RESPONSE TO 2ND PUBLIC REVIEW DRAFT OF THE OAHU GENERAL PLAN

The Board of the Defend Oahu Coalition (DOC) submits the comments below on the Oahu General Plan 2nd Public Review Draft (Feb 2017).

The Defend Oahu Coalition is a diverse group of community residents, environmentalists, activists, and religious leaders, all working together toward one immediate goal: protecting the rural nature of Koʻolau Loa and the North Shore communities on Oahu from the dangerous effects of large scale development. The DOC believes that the beautiful open spaces and shorelines on Oahu are for all residents and visitors to enjoy. The DOC is committed to ensuring that these spaces and shorelines will be a resource for generations to come.

Thank you for considering our comments.

Defend Oahu Coalition Board:

Margaret Primacio, President
Alan Poh, Vice President
Laura Gray, Director
Michael Kirk-Kuwaye, Director
Elizabeth Rago, Director
1. All GP references to “transit-oriented development” and “transit stations” should be changed to "RAIL transit-oriented development” and “RAIL transit stations.” Bus stops in rural districts should be excluded from TOD.

2. Item 24: Delete this item/revision because a) “grow in organic fashion” is meaningless and green lights growth in rural areas, b) almost everyone living on Oahu wants to have generations remain in their “home towns” or community, and c) the current population of Koolau Loa is already at or exceeding the GP distribution percentage for Koolau Loa (1.4%) and there is no room for growth. The defacto population, which includes visitors, pushes the count and percentage even higher. The definition of rural is country, country people and life, and agriculture.

DELETE “Given the population distribution reflected in the General Plan, it is intended that rural centers be allowed to grow in an organic fashion, providing for generations to remain in their home towns and maintain the economic viability of our rural and suburban communities.”

3. Item 63: Add to this revision at beginning of sentence, “Within limits of existing infrastructure and supporting services, ....” The Koolau Loa communities have limited transportation access – a two-lane, coastal highway with no alternative route – and supporting services, which caps population and economic growth.

KEEP WITH CHANGE: “WITHIN THE LIMITS OF EXISTING INFRASTRUCTURE AND SUPPORTING SERVICES, (e)stablish geographic growth boundaries to accommodate future population growth while at the same time protecting valuable agricultural lands and open space.”

4. Item 83: We fully support this revised Policy 3:

SUPPORT AND KEEP “Guide the development and operation of visitor accommodations and attractions in a manner which avoids unsustainable increases in the cost of providing public services and which also respects existing lifestyles, cultural practices, and natural and cultural resources.”

5. Item 104: Reinstate original GP language on importance of agriculture to Oahu provided by rural districts.

REINSTATE (original) “Policy 5  Maintain agricultural land along the Windward, North Shore, and Wai’anae coasts for truck farming, flower growing, aquaculture, livestock production, and other types of diversified agriculture.”

6. Item 109: Delete “high-value” because the growing demand for agricultural land (see food sustainability references in GP) will only increase the value of all agricultural land.

KEEP WITH CHANGES “Prohibit the urbanization of high-value agricultural land located outside the City’s growth boundaries.”
7. Item 118: We fully support revised Policy 16 because this recognizes open agricultural land as contributing both to food sustainability and resident/visitor quality of life experience.

SUPPORT AND KEEP “Policy 16 Incorporate into planning documents the scenic value of agricultural lands as an open-space resource and as a valuable tourist amenity, and plan ways to make associated rural communities be part of this desirable scenic resource.”

8. Item 170. Delete “and rural” (which was added to this 2nd draft) because it is redundant; “low-density” (original language) includes rural. Also insert the clause, “within limits of existing infrastructure and supporting services,” because adequate infrastructure/supporting services must precede growth.

KEEP WITH CHANGES “Policy 11 Encourage the construction of affordable homes within established low-density and rural communities, AND WITHIN LIMITS OF EXISTING INFRASTRUCTURE AND SUPPORTING SERVICES, by such means as ‘ohana’ units, duplex dwellings, and cluster development that embraces the ‘ohana concept by maintaining multi-generational proximity for local families.”

9. Item 234: Retain the original Policy 2 language (deleted in 2ND draft) because adequate infrastructure/supporting services must precede growth. This is especially important to Koolau Loa for reasons given in above Comments #2 & #3.

REINSTATE (original) “Policy 2 Use the transportation and utility systems as a means of guiding growth and the pattern of land use on O’ahu.”

10. Item 280: Retain the original Policy 3 language (deleted in 2nd draft) because adequate infrastructure/supporting services must precede growth. This is especially important to Koolau Loa for reasons given in above Comments #2 & #3.

REINSTATE (original) “Policy 3 Phase the construction of new developments so that they do not require more regional supporting services than are available.”

11. Item 318: Delete the revised Policy 4 and reinstate original Policy 4 language EXCEPT for “and/or a small town, country atmosphere consisting of communities which are small in size, very low density and low rise in character, and may contain a mixture of uses.” The basic definition of rural is “of or relating to the country, country people or life, or agriculture (Merriam-Webster).” So removing from the original Policy 4 reference to town, density/rise and mix use is in keeping with what rural districts are. The revised Policy 4, introduces urban terms such as “vibrant” and “growth opportunities.” Rural districts may have town centers and these should be addressed in the district SCPs and not the broad vision of the GP.

DELETE (revision) Policy 4: Maintain vibrant rural areas that reflect a relatively open and scenic setting, dominated by small to moderate size agricultural pursuits, with small towns of low density and low rise character, and which allows modest growth opportunities to address area residents’ future needs.

REINSTATE WITH CHANGES (original) Policy 4: Maintain rural areas as areas which are intended to provide environments supportive of lifestyle choices which are dependent on the availability of land suitable for small to moderate size agricultural pursuits, and a relatively open and scenic setting, and/or a small town, country atmosphere consisting of communities which are small in size, very low density and low rise in character, and may contain a mixture of uses.
12. Item 319 (revised Policy 5) and 320 (revised Policy 6): Delete both of these items because original Policy 4 (see above) encompasses the issues raised in these items. In addition, the GP is stated to be a broad, visionary planning document and these two revised policy content areas should be determined at the SCP/DP level.

DELETE “Policy 5. Encourage the development of a variety of housing choices including affordable housing in rural communities to replace lost housing inventory, and give people the choice to continue to live in the community that they were raised in.”

DELETE “Policy 6. Ensure the social and economic vitality of rural communities by supporting infill development and modest increases in heights and densities around existing rural town areas where feasible; and modest adjustments to growth boundaries to maintain an adequate supply of housing for future generations.”
May 5, 2017

HHF Planners
Sent to email address: gp2035@hhf.com

Draft Oahu General Plan

Under the guidance of the Oahu City Charter and these words of Lewis Mumford in “Whither Honolulu”, which are echoed in the 1964 General Plan, Hawaii’s Thousand Friends (HTF) has the following comments and recommendations on the Oahu General Plan.

Honolulu is a city that has only to learn how to conserve and utilize its natural advantages to remain one of the most attractive spots on earth: it is a city where, if the social and aesthetic vision needful for planning ever took possession of its leaders, a transformation might be wrought that would lift Honolulu beyond all rivalry. No city that I know would proportionately yield such returns to planning as Honolulu.

Under the City Charter the Oahu General Plan in concert with the Development/Sustainable Communities Plans are to “recognize and anticipate the major problems and opportunities concerning the social, economic and environmental needs and future development of the city and to set forth a desired direction and patterns of future growth and development.” (Section 6-1507)

The General Plan was envisioned to develop a wholesome, convenient, and attractive living environment that promotes the general welfare and prosperity of Oahu residents and preserves historic sites and natural resources by establishing the most desirable distribution and density of population and land use pattern for single-family residences, apartments, hotels, businesses, industries, schools and parks.

The promotion of Transit Oriented Development (TOD) to any transit station i.e. bus stop island wide does not reflect the City’s directed growth policy but instead encourages helter-skelter unplanned for high density development island wide without any connection to infrastructure capacity, community identity and quality of life, population growth pattern or protection of natural and cultural resources.

Disconnecting TOD from the rail corridor and promoting TOD island wide land use does not follow the City Charter policy of directed growth and is not good comprehensive land use planning. Any reference to TOD other than along the rail corridor should be deleted from the General Plan.
The DRAFT also promotes higher density and mixed-use development for all areas of the island regardless of the character and nature of the area. This new non-directed growth policy, if adopted, will invite urban sprawl, put a massive strain on already inadequate infrastructure and change the character of rural and suburban communities.

HTF recommends that any reference to higher density and mixed-use development outside of the Primary Urban Core and the Second City be deleted from the DRAFT General Plan.

Further taking the General Plan away from a directed growth policy and comprehensive land use planning is the introduction of short-term vacation rentals in residential and apartment zoned non-resort zoned areas. The introduction of tourism in every nook and cranny of Oahu changes the character and livability of our island. Not everyone wants to nor should they have to live next to a 24 hour 365 days a year resort where the people next door are unknown and do not contribute to the neighborhood or community.

HTF recommends that any reference to short-term vacation rentals in residential and apartment areas be deleted from the DRAFT General Plan.

The General Plan should recognize and emphasize the fact that Oahu is an island with finite land and resources through objectives and policies that seek to control resident and tourist population growth and not eliminate any reference to population growth as the DRAFT does.

HTF recommends that the DRAFT General Plan reflect the reality of climate change and sea level rise on our islands homes and public infrastructure – sewer treatment plants, roads, utilities, parks by establishing a new Objective under VII. PHYSICAL DEVELOPMENT AND URBAN DESIGN. The new Objective would require that a plan be created for each of the susceptible Development/Sustainable Communities areas to evaluate the vulnerability of public infrastructure to sea level rise with a policy statement requiring that the findings shall be incorporated into the appropriate Development/Sustainable Communities Plans.

Sincerely,

Donna Wong
Executive Director
May 8, 2017

Mr. Tim Hata  
O'ahu General Plan Project Manager  
Department of Planning and Permitting  
City and County of Honolulu

c/o HHF Planners  
ATTN: O'ahu General Plan  
733 Bishop Street, Suite 2590  
Honolulu, Hawai'i 96813  
Via Email: gp2035@hhf.com

Re:  O'ahu General Plan Update  
Second Public Review Draft - February 2017

Dear Mr. Hata:

Historic Hawai'i Foundation received notice and request for comments from the City & County of Honolulu on its efforts to update the O'ahu General Plan. Thank you for the opportunity to comment.

Historic Hawai'i Foundation (HHF) is a statewide nonprofit organization established in 1974 to encourage the preservation of sites, buildings, structures, objects and districts that are significant to the history of Hawai'i. As an organization that is concerned with the effect of planning on historic properties, HHF confirms our intention to participate in the review and comment process.

It is important to note that the State Constitution provides direction for all comprehensive plans with a firm commitment to conserving historic and cultural property for the public good. HHF feels strongly that the O'ahu General Plan needs to address this issue throughout the land use recommendations and not only in the section on Cultural and Recreation.

The Constitution of the State of Hawaii recognizes the value of conserving and developing the historic and cultural property within the State for the public good. The legislature declares that the historic and cultural heritage of the State is among its important assets and that the rapid social and economic developments of contemporary society threaten to destroy the remaining vestiges of this heritage. The legislature further declares that it is in the public interest to engage in a comprehensive program of historic preservation at all levels of government to promote the use and conservation of such property for the education, inspiration, pleasure, and enrichment of its citizens. [HRS §6E-1] [emphasis added]

General Plan Format
As stated in its Preamble, the purpose of the O'ahu General Plan is “intended to guide land use and development decisions and to influence actions in 11 areas of concern:”
After a brief overview of the areas of concern, the Plan outlines Objectives and Policies related to each of the areas.

Although the General Plan Update contains valuable policy items, it is missing an overall statement that describes a long-term vision, or proposed end state, that would result from implementation of key policies. The Plan also lacks a cohesive or unifying statement that explains the larger intent for physical assets, infrastructure, livability, quality of life and aspirations.

**Historic Hawai‘i Foundation recommends including a Vision Statement** that includes an acknowledgement that O‘ahu is a special place that provides many benefits to residents. This statement should address the aspirations for the long-term physical and human environments for O‘ahu. The Plan should address ways in which this special place can be preserved, protected, enhanced and celebrated. Suggested additions include:

- Historic preservation of significant buildings, structures, features and landscapes contributes to the distinctive character, environment, culture, economy and quality of life. Honolulu will be vibrant with well-preserved and appropriately used structures representing every era of O‘ahu’s history. Quality of life will be enriched by a built environment that demonstrates the continuity and evolution of O‘ahu as a unique place rich in history.

- Preservation and respectful urban design will reinforce the distinctive identities of each community and district, including buildings, structures, landscapes and views.

- By policies that link the values of historic preservation with economic development, Honolulu will create jobs, stimulate related retail and services, generate tax revenues and shine as a business location and tourist destination.

- O‘ahu will be a living classroom that teaches history and architecture to children and all others who want to learn.

**Guiding Principles should address core values that should frame important decisions.** The Plan Update has elements of those values scattered through the document, but it would be useful to make them explicit. For example, Environmental Sustainability and Economic Opportunity are embedded in the Objectives. HHF recommends adding other Guiding Principles, including Stewardship of Legacies and Civic Engagement.

The Plan does not address potential contradictions or conflicts that may arise through general policies without specific recommendations. For example, the emphasis on urban growth and housing comes at the expense of food security and agriculture. The emphasis on “full” development of the urban core places unbearable pressures on existing neighborhoods, community services, open space and historic resources.

**Historic Hawai‘i Foundation recommends addressing these conflicts, with careful and thoughtful analysis of issues** such as preserving agriculture and food security; watershed management; location of waste facilities and infrastructure; the link between land use, transportation and urban design; housing for all income levels, including the middle class; and boundary justifications for urban growth boundaries.
Planning and policy decisions should be considered for both their short-term and long-term impacts on the human and physical environments. **Historic Preservation should be a key component of the vision with appropriate identification, and implementation procedures and incentives.**

“Area X. Culture and Recreation” includes several laudable objectives and policies to that end. We support those statements and agree with their inclusion. In addition, HHF recommends that other chapters integrate a commitment to historic preservation, natural resource conservation, agricultural and watershed land protection, and urban design excellence.

I would be happy to discuss specific recommendations or suggested language for the Plan in person. I can be reached at (808)523-2900 if you would like to discuss more detailed comments.

Very truly yours,

Kiersten Faulkner, AICP
Executive Director
May 01, 2017

Dept. of Planning and Permitting
Mr. Tim Hata
650 South King St. 7th floor
Honolulu, HI 96813-3017

RE: Input for City and County of Honolulu General Plan

Dear Mr. Hata,

My name is Andrew Marn. My father, James, and I spoke with you at your office on March 24, 2017 regarding the updating of the City and County of Honolulu’s General Plan. We would like to suggest some ideas to consider for the update.

We have seen a shift in retail space in the Kalihi area, specifically the Dillingham Blvd. to School St. areas where the demand seems to be moving mauka nearer to the more desirable School St. residential neighborhood, as the Kalihi Shopping Center and other retail spaces makai of King St. have been taking longer to fill and lagged in occupancy with some spaces remaining vacant for months and even years. There also appears to be a conversion of commercial use of spaces in the Dillingham area to more large scale retail (car dealerships, big box stores, etc.) that are suited for industrial or less densely populated areas.

By contrast, spaces mauka of King St. seem to be at a premium where even structures that are obsolete and visibly in need of improvements are often vacant for a much shorter periods. Many retailers would like to locate in the Kapalama-School St. corridor, but are unable to find space or business properties. Vacant space for businesses are low to non-existent there, even in Kamehameha Shopping Center, the major shopping center in the neighborhood. Also, these retail spaces are often short on parking to meet the demand. The parking situation at Helena’s Hawaiian Food restaurant is one example. Adequate zoned commercial land encouraging new development would provide more parking on-site. This area is ripe for more retail spaces for small and neighborhood-friendly businesses. It is for this reason that we feel the community is in need of increased commercially or mixed use designated areas.

We would like to suggest designating/reclassifying a larger area along School Street from the Houghtailing Street intersection to the Aupuni Street at a minimum, and possibly extending to Pohaku Street to Commercial use. We suggest a business/mixed use area of 160 – 200 feet on either side of School Street would be optimal. The School St.-Houghtailing intersection is a major focal point for traffic and business and should be planned for business at least 200 feet in depth on either side of School St.
There are already some small businesses in place and some non-residential use structures that extend to 200 feet off of School Street currently. We believe that allowing more small retail development in the area will provide much needed small businesses and space to meet the high demand of the area as well as begin a revitalization of the area that is much needed.

We believe that a modernized business/mixed use district on School St. will work synergistically with the Kamehameha Shopping Center in streamlining the traffic in area pinch points. Kam Shopping Center is located on the corner of two roads, North School Street and Kalihi Street, that serve as major passageways through the city. Therefore, not only are those roads being used by people wanting to access Kam Shopping Center but also by people who are commuting around the city in general, creating traffic congestion. Providing alternative retail options at N. School Street and Houghtailing may help ease congestion by diverting some of the consumer traffic away from that already busy intersection while avoiding any excessive additional travel.

For your review, attached is a neighborhood map indicating a proposed change in the Honolulu City General Plan for the Kapalama-School Street corridor. The yellow highlighted area is our suggestion for business/mixed use designations in the General Plan.

If you have any questions feel free to contact us at 808-537-3555. Thank you.

Sincerely,

Andrew Marn

Fncls:
Tax Maps:
1-6-15
1-6-14
1-6-05
To: gp2035@hhf.com
Comments due May 8, 2017 on O'ahu General Plan 2010-2035

From: Ka'a'awa Community Association
Post Office Box 33
Ka'a'awa, HI. 96730

The Ka'a'awa Community Association Board passed the following recommendations on the 2017 General Plan 2nd Draft:

KCA opposes changing the focus of the General Plan from directed growth areas of Honolulu to all of O'ahu.

Tax monies for infrastructure have gone to Ewa/Second City for many years now and all Ko'olauloa Community Associations,(except Laie), the Kahalulu, Kailua, North Shore, Manoa, Mililani/Waipio/Melemanu and Makakilo/Kapolei Honokai Hale Neighborhood Boards, have made Resolutions against developing a 'Third City' in Ko'olauloa.

The O'ahu Metropolitan Planning Organization's (OMPO) Oahu Regional Transportation Plan 2040 (ORTP) has only long range projects slated from Haleiwa to Kahalu'u in the 2029-2040 time frame. Temporary emergency fixes to Kamehameha Highway Route 83, that sole single access road, are being overwhelmed by rapid high wave erosion. Sea level rise is to only make these conditions worse and is being adjusted upwards currently per SOEST and/or NOAA (Chip Fletcher of UH's study).

The Department of Emergency Management has advised area residents to have 30 days food and water supply for natural disaster preparedness. The DEM estimates 5.2 to 6.2 hours to evacuate the area. A tsunami from the Aleutian Islands in Alaska (potentially Extreme Tsunami) will get here in 4 hours. This road carries about 3.5 million tourists annually now in addition to portions of the de facto resident population of 1,029,798. 1% population growth goal in Ko'olauloa is nearly 11,000 people, plus there is a partial DPP
count of 4,356 already zoned Urban vacant lots under 20 degree slope mostly privately owned towards infill of nearly 22,000 population increase.

The 2010 census was 16,732 and traffic has already fully saturated much of the time per OMPO. This is also the furthest vehicle miles traveled area from the Primary Urban Core jobs, etc. Responsible and sustainable Planning should not include this 'more people, more problems' situation. There has been only deferral and deletion of most work on this highway corridor so far...

KCA opposes detaching TOD from the Honolulu rail corridor and allowing TOD in every community, especially Ko'olauloa.

KCA opposes the promotion of higher density and mixed use development as a policy for all areas regardless if the community is rural and not in the Sustainable Communities Plan.

KCA recommends that Housing and Communities Page 10, #20 be deleted. It implies that Transit oriented developments are desired and appropriate for all communities on O'ahu. The bus stops are our only 'transit' stations in Ko'olauloa. Islandwide there are 3,837 bus stops. Route 83 has few places appropriate for TOD, and definitely increased density is not desired in remaining rural areas.

KCA opposes all changes to the Urban Growth Boundaries at Malaekahana ahupua'a in Ko'olauloa in particular, and in this Plan generally. The Development Plans and SCP's defined those for stakeholders already islandwide. Directed growth to the PUC and Ewa area is all that we support within 2035 time frame.

KCA points out that the 4,356 partial DPP count of privately owned lots/lands in Ko'olauloa will provide the Plan's "organic fashion" for generations to remain in their home towns: adding "where infrastructure is existing and not before" where feasible in reference to Physical Development and Urban Design section p.11.
KCA supports a carrying capacity study for O'ahu population. Population, Objective A, policy 2. Since none exists and sea level rise is threatening much low lying housing, shoreline setbacks need to increase for all new construction so that population potential is also adjusted, growth discouraged, and thereby safety is emphasized regarding the people who live here.

KCA supports that the words 'to prevent urban sprawl' be added after the word boundaries ="Development is contained within growth boundaries: to prevent urban sprawl " in Population, Policy 3.

KCA opposes designating all of Laie a Resort area. This was a 49 unit motel designation nodule area zoned Resort that would now allow large scale development in Laie. There are already 725 visitor units to be allowed at Turtle Bay Resort with an additional daytime population add of 4,400 per their SEIS. That is an estimated 12 year build out on our 2 lane road that is eroding into the sea now. It is being a one lane road frequently as it is now due to emergency and scheduled bridge repairs, etc. Delete from the Economy, policy 10 please. All resort development additional populations do not count in the OGP's 1 or 1.4% growth for Ko'olauloa. Only what is considered permanent residential housing is counted.

KCA opposes allowing short term vacation rentals in residential zoned non-resort areas. There is possibly 'demand' for these, but in Ko'olauloa 69% of all rentals are these illegal unpermitted transient vacation units already. ((Our former State House Rep a year ago =this source).

That did not include the nearly thousand students of BYUH that are in rentals. More than 5 unrelated people in housing is also illegal, with 10 being common in Laie area. This mainly has contributed to a lack of lower cost rentals. Of the 4500 Air B & B units on Oahu, 2500 are owned by 500 people or companies (Air B & B included). There are many more TVU rental sources than them. The DPP has not shown the ability to enforce the rules on offenders, only 7 citations in District 23 which has over 1100 known TVU's. More of them is not desirable whether visitors want them or not is our position. The as yet not passed Ko'olau Loa Sustainable Communities Plan has BYUH doubling its student body (plus staff). If allowed, this should be on-campus (100 acre campus) housing only.
KCA recommends language supporting farms and farming. along the windward, North Shore, Waianae coasts that was in the original OGP. We support the protection of all farms from urbanization, not just IAL designated land.

KCA recommends deleting Policy 12 of Housing and Communities Objective

A. Preventing residential development outside the PUC and Second City areas should remain/become the over-riding policy.

KCA recommends that Energy Objective A section, policy 6 eliminated. geothermal energy from being considered in all areas on O'ahu - the hotspot areas of O'ahu at Kailua, Kaneohe, and Waianae are not good places for the fracking methods for this type of energy. No place on O'ahu is as long as that is the method.

KCA supports Deletion of Physical Development and Urban Design Objective E, #320, Policy 6 (page 54) in its entirety. No growth boundary adjustments are desired, not large or modest ones; nor changes to Land Use Ordinances that would allow them. The same Deletion is recommended for #319/Policy 5 (page 53). It is NOT sustainable development to take everything and develop it for this generation's wants. We must consider future generations needs and the removal or use of resources this much development already is having on O'ahu. Affordable housing and all infrastructure is in Ewa by design of directed growth. It may very likely NOT be in the community we were raised in on O'ahu. People need to plan for this reality.

KCA supports changing Cultural and Recreation Objective A, Policy 1 'encourage the recognition' with: "Recognize" the Native Hawaiian host culture, including its customs, language, history and close connection to the natural environment as a dynamic, living culture and as an integral part of O'ahu's way of life. The Association of all the Hawaiian Civic Clubs supported no development of a 'Third City' in Ko'olauloa by Resolution also. The OGP needs language to support the Hawaiian sustainable planning to the 7th generation...of having a beautiful natural rural, agricultural (and scenic open space) is an integral part of this
culture and KCA's. This means much more than lip-service to all of us on this Board and in this moku.

KCA supports the recommendations of Kahaluu Neighborhood Board, Kailua Neighborhood Board, and others on many points in the OGP. Mahalo for any changes made to accommodate our ideas on the O'ahu General Plan.

Sincerely,

Robert "Kealoha" Domingo
KCA Chairman
Dear HHF,

Keep it Kailua’s Executive Board adamantly OPPOSES;

General Plan Economic Policy 10: Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively."

- Rationale: Allowing the expansion of visitor lodging into non-resort zoned areas throughout the island is an incompatible land use that threatens the housing supply and the essential character and quality of life of our residential, rural and agricultural communities.

Attached is our position paper on protecting residential neighborhoods from tourism sprawl.

Thank you for your consideration.
Protecting Oahu’s Residential Zoning

May 8, 2017
SUMMARY
The comprehensive planning process, a visionary endeavor for greater public good, requires high-caliber, impartial professional input to maintain focus on the goals and to insure the absence of political or selfishly promoted agendas.

“Planning is for People”, says the Honolulu Planning Department. Since much of the populace comprising their constituency, lives in residential areas, it is natural that a basic and continuing element of comprehensive planning “for the people” is the protection and enhancement of residential areas. The pursuit of the plan review should provide no exception to this well-established “rule-of-thumb”.

After all, to exert a direction that would endanger the character and quality of life found, or expected in, a residential neighborhood, would not be very good comprehensive planning. Long-range comprehensive planning also seeks to prevent future physical and/or social problems. Reducing Oahu’s housing supply by converting residential homes into visitor lodging businesses is at odds with resolving Oahu's critical need for affordable housing for its residents and developing a strong sense of community in our residential and rural communities.

Consequently, it is difficult to comprehend why the General Plan would include "Economic Policy 10: Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively." These non-residential uses would reduce Oahu’s housing supply in residential zoning and compromise the residential character or the “quality of life” of our neighborhoods.

We hope this initial misdirection will be remedied and the idea of tourist accommodations in residential areas be scrapped by good professional judgment. Initial analysis has properly emphasized the measure of “sustainability” as paramount in determining the viability of planning directions. Pushing tourism into residential neighborhoods would be detrimental to the long-term sustainability of tourism on Oahu. First, it would create extensive and lingering resentment against tourism in general by residents. Visitor satisfaction and repeat visitation would suffer (who wants to visit where one is not wanted). Secondly, this negative atmosphere would affect the successful marketing of our primary tourist accommodations in resort areas. As tourism grows, its acceptance in the eyes of the local populace diminishes and recently is trending downward (See recent opinion polls conducted annually for the Hawaii Tourism Authority). Negatively impacting this situation by pushing tourism accommodations into residential areas would seriously aggravate it, instead of helping to alleviate it.

For these and additional reasons outline in our report, Keep it Kailua believes all future visitors lodging should only be located in resort-zoned land parcels. New visitor accommodation developments in Waikiki, Ko Olina and the North Shore resort-zoned areas are already including vacation rentals in their product mix. Investors who wish to
partake in the vacation rental industry can purchase properties in these areas. If individuals or communities determine they would like to develop visitor lodging on non-resort zoned parcels, they have the option to follow the appropriate due-process required for re-zoning land-uses.

**HISTORY**

In 1986, after extensive public hearings and debates, the City Council concluded visitor lodging businesses were not appropriate for residential zoned neighborhoods and passed Land Use Ordinance (LUO) 86-96 that prohibited transient rentals (rentals for less than 30 days) for all zoned districts except resort and resort mixed-use. In 1989, the City Council passed LUO 89-154 that specifically prohibited new Bed and Breakfast hotels (B&B’s) in residential zoning, but grandfathered existing Transient Vacation Units (TVU’s) and B&B’s with non-conforming use certificates (NUC) that proved that they were in operation prior to the passing of the ordinances. This compromise was agreed upon to avoid possible “unjust taking” law-suits, but included the assurance by the City Council that visitor lodging businesses would ultimately be removed from residential-zoning via attrition¹. The legislative intent of these ordinances was to prohibit hotel-like businesses from operating outside resort-zoning and protect residential-zoning for residential uses.

Six years ago, after being lobbied by a special interest group of illegal vacation rentals and B&B hotel owners, a City Council member by request proposed a bill to legalize visitor lodging businesses in residence zones. The public purpose behind this action remained obscure.

After extensively reviewing the issue, the Honolulu Planning Commission “unanimously” rejected all proposed bills that allow additional visitor accommodations in residential zoning. This decision required the City Council to have a super-majority in order to pass any of the proposed bills. Commission Chair Karin Holma summarized their decision by stating; “Legalizing bed and breakfast is spot zoning without the legal process involved and it’s difficult for me to justify the legalization of mini-resort use in a residential area...I don’t see much evidence of a community need or benefit. I think this is a really slippery slope... There is a lot of money to be made in bed and breakfast and for us to think that allowing more of them will not result in something uncontrollable could be a serious problem.”

A tsunami wave of community groups and individuals from around Oahu came forward to oppose all bills that allowed additional visitor lodging businesses in residential zoning including the Kuli’ou’ou/Kalani Iki Neighborhood Board No.2, Waialae/Kahala Neighborhood Board No. 3, Diamond Head/Kapahulu/St. Louis Neighborhood Board No. 5, Waianae Neighborhood Board No. 24, North Shore Neighborhood Board No. 27, Koolauloa Neighborhood Board No. 28, Kailua Neighborhood Board No. 31, Waimanalo Neighborhood Board No. 32, ILWU Local 142, Unite Here Local 5 AFL-CIO, Hawai’I, League of Women Voters-Honolulu, The Institute for Human Services, Punalu’u

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¹ In 2009, former 1989 City Council member John Henry Felix reconfirmed the agreement when he publicly stated; “We have to live up to our commitment of 1989, I would say no more TVU’s, no more B&B’s, we will allow that number (those grandfathered in 1989) and as they fall out of the system, so be it. We have to keep communities residential in nature and not turn them into visitor destination areas, not a second Waikiki”.
Community Association, Waimanalo Beach Lots Association, Livable Hawai’i Kai Hui, Save Oahu’s Neighborhoods Hawai‘i, Lanikai Community Association, LaniKailua Outdoor Circle, Keep it Kailua, Senator Carol Fukunaga, Senator Fred Hemmings, Senator Ken Ito, Representative Lyla Berg, Representative Michael Magaoay, Representative Cynthia Thielen and Representative Gene Ward and petitions with over 2,000 signatures from Oahu residents.

No Neighborhood Board and no community associations came out to publicly support the proposed legislation that would allow additional visitor lodging businesses in residential neighborhoods.

On December 16th 2009, after careful deliberations, the City Council in third reading rejected Bill 7 that would have allowed B&B hotels in residential zoning. Numerous residents and community groups applauded their final decision.

FACTS

Modifying zoning regulations to allow visitor lodging businesses in residential-zoned neighborhoods and communities is not in accordance with Honolulu’s General Plan and some of Oahu’s Sustainable Community Development Plans. Oahu’s General Plan specifies visitor accommodations will only be located in Waikiki, West Beach, Kahuku, Makaha, and Laie. Allowing visitor lodging in all residential zoning would spread visitor resort areas to all regions of Oahu. In addition, Sustainable Community Plans such as Ko‘olinaupoko clearly states the government must “Protect the integrity of existing residential areas and enhance the desirable living amenities available to them.

The City and County of Honolulu Oahu Tourism Strategic Plan 2006-2015 states; “The spread of B&B’s and Individual Vacation Unit (IVU) rentals in non-visitor designated communities, such as the North Shore and Kailua, are changing the nature of these communities leading to resident dissatisfaction”. The plan recommends the City & County enforces current regulations, and as necessary, advocate for additional regulations, related to Bed and Breakfasts and Individual Vacation Unit Rentals to ensure that communities remain great places to live.

City officials have continuously enforced the LUO’s relating to illegal B&B hotels and vacation rentals, but inspector procedures and training have yield unsatisfactory results because they are oriented toward using the same inspection methods as building permit infractions and do not include prima facie evidence or a “preponderance of the evidence” standard as allowed by state law.

Internet advertising of illegal vacation rentals and B&B hotels on Oahu has caused the industry to grow exponentially and these same websites are marketing many of Oahu’s residential communities as tourist destinations.

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2 A resident’s sentiment survey conducted by the Hawaii Tourism Authority found 62% agreed that “This Island is being run for tourists at the expense of local people.” The figure had been 55% in 2005 and 48% in 2002.

3 The world’s largest travel advisory website tripadvisor.com declared Kailua, Oahu in 2008 as the 2nd hottest US destination based upon internet surveys.
Numerous municipalities from the US and around the world have faced the same problems as Oahu in regards to the proliferation of visitor lodging in residential zoning. Most of them have passed ordinances restricting these businesses in residential zoning including New York City, Paris, Chicago, Tampa Bay, Bali, San Francisco, Dubai, Miami, Carmel by the Sea, Monterey, Orange County, Sedona, Provo, Whistler, Key West, Victoria City, Eagle-Vail, Denver, Sedona, Coronado and Oakland.  

NEGATIVE IMPACTS
The proponents of vacation rentals and B&B hotels claim the “primary problems” with their businesses being located in residential zoning are nuisance issues such as noise and parking. These impacts do exist, but they are not the primary problems relating to visitor lodging businesses in residential zoning.

The primary problems with visitor lodging businesses in residential zoning are the following:

Reduces Residential Housing Supply
Allowing residential homes and rooms to become visitor lodging reduces Oahu residential housing. In communities such as Kailua, the North Shore and Laie, there has been severe shortage of available housing for residents that can be attributed to the proliferation of illegal vacation rentals and B&B hotels. As an Island community, Oahu has finite quantity of land that could be used for residential housing. Reducing the availability of housing in one community, ultimately will impact other communities.

Drives-up Property Values and Long-Term Rental Rates
This might be good for some residents who already own homes (54%), but it's definitely bad for residents who are renters or hope to own a home someday. Because visitor lodging businesses have a significant higher cash-flow than residential rentals, investors (including out-of-state) can easily outbid Hawaii residents who want to use a residential property as a home or a residential rental. These higher purchase prices properties will also increase property-tax assessment values for surrounding properties. Real estate experts believe illegal visitor lodging in residential neighborhoods have contributed to Honolulu’s record-high long-term rental rates by reducing housing inventory and increasing property owners’ expectations for return on investment.

Alters the Residential Character and Ambiance of Neighborhoods and Communities
Visitor lodging businesses in residential neighborhoods compromise the social fabric of neighborhoods and their communities by displacing local residents from neighborhoods and their communities. Their presence changes the character of a neighborhood from

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4 List of municipalities were compiled from articles and internet searches and are not a complete list of all municipalities that prohibited or restrict visitor lodging in residential zoning. Each municipality zoning ordinances were not reviewed and may change over time.
5 According to the US Census Bureau (2000).
6 A September 23, 2008 Honolulu Advertiser article reported census data showed Hawaii had the highest rent for residential properties in the US.
being residential to vacation home or de-facto resort. Many Hawaii residents chose their residential-zoned neighborhood because they want to live in a neighborhood where they know their neighbors or there are neighborhood families with children that their kids can play with. Allowing visitor lodging businesses in their neighborhoods is a taking of their rights to enjoy a residential neighborhood environment. Furthermore, pushing mini-hotels into residential areas can also create resident resentment that could cause conflict with visitors and mar future tourism sustainability.

**Jeopardizes the Hotel Industry and its Employees**
Visitor lodging businesses in residential zoning have unfair competitive advantages that could lead to reduction in existing hotel rooms and their employees. The owners of residential visitor lodging businesses do not pay resort-zoned property tax rates, employ union employees or carry commercial liability insurance as required for most Oahu hotels.

**Compromises Neighbors’ Safety and Security**
Visitor lodging businesses bring in a constant stream of strangers into a neighborhood, making it difficult for neighbors to know who belongs in the neighborhood and who does not. In addition, visitor lodging guests do not need to comply with Hawaii’s sexual predator laws and register their stays with authorities since their visits will be short term. Neighbors could be living next to convicted sexual predators without being informed. In contrast, long-term renters who are convicted sexual predators are required to register their residence with authorities who will post their name and addresses on the internet.

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7 Hotel employee unions ILWU Local 142 and Unite Here Local 5 AFL-CIO publicly testified their opposition to allowing additional B&B hotels in residential zoning and expressed their belief that illegal B&B hotels and vacation rentals are negatively impacting their members’ hotels financial performance and their members’ ability to afford residential housing.
Keep It Kailua is a grassroots community group founded in 2004 whose purpose is to retain Kailua’s family-oriented residential character and quality of life.

Keep It Kailua’s goals are to:

• Protect residential zoning and promote permanent residency in our neighborhoods
• Preserve and enhance scenic, civic, recreational and cultural features that define Kailua’s sense of place
• Protect water resources essential to the health of the environment
• Preserve trees and maintain open green space
• Promote walking and the use of non-motorized bicycles as alternatives to automobile transportation within and around the town
• Promote businesses that serve the residential community
• Support other community groups with similar goals
May 8, 2017

To: City & County of Honolulu - General Plan Proposed Revised Plan  
c/o HHF Planners  
733 Bishop Street, Suite 2590  
Honolulu, HI 96813

From: Alice P. Hewett, President  
Ko‘olaupoko Hawaiian Civic Club

Re: Comments & Recommendations for Changes to Latest Draft

Aloha. The Ko‘olaupoko Hawaiian Civic Club is a non-profit community organization and one of the largest civic clubs in the Association of Hawaiian Civic Clubs. Our membership is drawn primarily from the nine ahupua‘a around Kane‘ohe bay in the moku – district – of Ko‘olaupoko. We have submitted comments separately on the draft Sustainable Communities Plan for Ko‘olau Poko, and offer these comments and recommendations for changes to the latest draft of the O‘ahu General Plan.

Content of General Plan

- Recommendation: Insert general statement regarding incorporating the ahupua‘a – traditional Hawaiian resource management concept – as part of the overarching purpose “Taking a lesson from traditional Hawaiian cultural practices, this plan will incorporate the ahupua‘a concept of land and resource management to promote sustainability and stewardship.”

Introduction

- Add to Paragraph 4: Since the adoption of the General Plan in 1977, various plan a number of amendments have been made over the years, including this update. were subsequently adopted in 1979, 1982, 1985, 1987, 1989, 1990, 1991, 1992, and 2002. However, in spite of these changes, the basic themes and directions for growth remain valid, and require continued pursuit while at the same time directing further efforts toward food sustainability by encouraging more locally-based food resources.”

Preamble

- Insert one word in bullet point in #14: “preservation and protection of agricultural, natural, cultural and open space resources”
- Insert additional language to sixth bullet point: “…greater recycling and waste stream reduction by establishing recycling centers for each SCP and IDP.”
The Economy

Insert a sentence: **Identify the economic benefits of local food production for local markets.**

Natural Environment and Resource Stewardship

After the third sentence, insert a statement: **Fresh water resources are finite on O`ahu, and are vital to humans, wildlife and the natural environment.**

Housing and Communities

- Insert a statement that would call for **enforcement of affordable housing units for low-income families** (since current laws seem to be based on moderate-income and out of the reach of many island families).
- Add to the end of policy statement, **“including development of affordable housing.”**

I. Population (Policy Statements)

Objective B: add the following: **Provide economic incentives to encourage local food production and sustainability, and encourage agricultural and aquaculture occupations.**

II. The Economy (Policy Statements)

- Objective B, Policy 2, add: “…and appreciation for island heritage, culture and values.”
- Objective B, Policy 5, delete: “…in Waikiki.” This policy should extend islandwide.
- Objective B, Policy 7, delete: “…and Laie”, and insert “and” between “Ocean Pointe / Makaha Valley.”
- Objective C, Policy 1, restore wording: “…source of income and employment” at end of sentence.
- Objective C, Policy 3, add to end of sentence: “…products, and encourage more local production for local consumption and food sustainability.”
- Objective C, Policy 6, delete the words: “high quality” before “agricultural lands”.
- Objective C, Policy 8, delete the words, “high value” before “agricultural lands”.
- Objective D, Policy 3, insert the words, “responsible and sustainable” before “ocean recreational activities.”

IV. Housing and Communities (Policy Statements)

- Objective A, opening statement, add: “…including setting affordable housing prices at levels that are truly affordable to the residents who need it” after the word, “afford”.
- Objective A, policy 13, insert: “…while restricting ADUs to local residents only.”
- Objective B, **reinsert old “Policy 5” as new “Policy 6”, including old language.**

V. Transportation and Utilities (Policy Statements)
- Objective A, policy 6, insert after “features”: “…wherever possible.”
- Objective B, policy 7, insert at end: “…to establish sanitary recycling centers in each SCP to take care of all solid waste and conduct active recycling in each district.” (to avoid adversely affecting any one sustainable communities plan district or other planning district with waste from other districts and help communities recognize the importance of carrying a fair share of the waste/recycling load).

VI. Energy

- Objective A: **reinstate old Policy 3**

VII. Physical Development and Urban Design

- Objective A, insert **new policy**: Pursue relocation of existing large fuel storage facilities away from areas near fresh water resources or aquifers.
- Objective F: **reinstate old Policy 7** (regarding beautification programs).

X. Culture and Recreation

- Objective D, Policy 10: insert “practices,” after “cultural”.
- Objective D, Policy 13, correct spelling: should read “malihini” instead of “malahine”
leadership and scholarships. Its membership is open to people of Hawaiian ancestry and those who are “Hawaiian at heart.”

P. O. Box 664 * Kaneohe, HI 96744
Ph. (808) 235-8111 / 226-4195 * www.koolaupoko-hcc.org
May 4, 2017

Ms. Kathy Sokugawa  
Acting Director  
Department of Planning & Permitting  
City and County of Honolulu  
650 South King Street, 7th Floor  
Honolulu, HI 96813

Subject: O’ahu General Plan Update – Public Review Draft

Aloha e Ms. Sokugawa,

Mahalo for the opportunity to provide comments on the Second Public Review Draft of the O’ahu General Plan (Update).

We find many of the proposed changes in the Second Public Review Draft to be well aligned with Kamehameha Schools’ new Strategic Plan and Vision. We are pleased to see the emphasis of Native Hawaiian history, culture, and language throughout many of the objectives and specific policies. The inclusion of Resource Stewardship measures that emphasize sustainability and protection of our natural and cultural resources are important both for the ʻaina and our people. We approve of the approach the plan takes for agricultural lands, encouraging innovation and farming enterprises of all sizes. And as reflected in our planning for our own lands, we support live/work/play multi-modal communities with complete streets, transit oriented development and other policies that will help to improve the quality of life and availability of affordable housing for our local residents.

However, we noted the absence of the Kahala Resort in the list of “secondary resort areas” (Chapter II, Objective B, Policy 7). We propose the list should include Kahala because it has been in continuous operation since 1964 (under different owners), whereas neither Hoakalei nor Mākaha Valley contain any existing resort facilities. In addition, the Kahala Hotel & Resort is larger than the hotel in La‘ie and is comparable in size to the Turtle Bay Resort. We believe the Kahala Hotel & Resort qualifies for recognition as a secondary resort area in the updated O’ahu General Plan.

Mahalo again for the opportunity to provide our comments. Should you have any questions, please do not hesitate to contact me at 808-534-3944.

Sincerely,

[Signature]

Walter Hoʻomae, Managing Director  
Commercial Real Estate Division  
Kamehameha Schools

CC: HHF Planners  
ATTN: O‘ahu General Plan Update
May 2, 2017

To: HHF Planners

From: Ed Case, Senior Vice President and Chief Legal Officer

cc: Kathy Sokugawa, Acting Director, Department of Planning and Permitting, City and County of Honolulu

Re: Revised General Plan Second Public Review Draft

This responds on behalf of Outrigger Enterprises Group to Director Sokugawa’s March 1, 2017 request for review and comment on the Revised General Plan Second Public Review Draft.

By way of background, Outrigger is a seventy year old Hawaii hospitality company. We own and/or manage some 6,500 rooms at 36 properties throughout Hawaii and the Asia-Pacific-Indian Ocean region. Our properties include 13 in the City and County of Honolulu of which 11 are in Waikiki. We employ close to 1,400 residents of the City and County of Honolulu. Throughout our history we have been deeply involved in the overall planning and development of Oahu generally and Waikiki specifically.

In that context we offer the following comments to the Revised General Plan Second Public Review Draft:

- (Objective A, Policy 1, last line) Typo; “conditions”.

- (Objective A, Policy 3) We support the statement but note that there are various established industries, including tourism, that are non-polluting.

- (Objective A, Policy 5, fourth line) Delete the word “small”. Regulatory barriers are burdensome, redundant and costly to all businesses.

- (Objective B, Policy 1, first and second lines) Add between the words “to” and “improve” the words “continue to”. The visitor industry has long pursued these improvements.

- (Objective B, Policy 4) Add at the end “and by funding the preservation and expansion of Waikiki Beach”. Industry studies estimate that the economic value of a healthy Waikiki Beach is at least $2 billion annually.
- (Objective B, Policy 6) Omit “rather than on development densities”. The overall quality of the visitor experience does not correlate directly to density; many other factors come into play. Taking Waikiki as an example, there are areas where higher density has likely degraded the visitor experience, but also other areas where higher density might materially assist redevelopment that would enhance the visitor experience.

- (Objective B, Policy 7) We generally agree with specifying particular secondary resort areas if (a) those areas are specified on the basis of sound overall planning rather than owner/developer advocacy and (b) so specifying is accompanied by an express provision that secondary resort areas elsewhere should not be facilitated. General overdevelopment of Oahu and the extension of development into previously undeveloped areas have placed at serious risk the overall visitor experience and Oahu’s continued position as a premier resort destination in an increasingly competitive world. As a result, any government endorsement of specific secondary resort areas should be undertaken with great deliberation and care. The specific proposed secondary resort areas identified in the draft should be carefully reviewed against these criteria before further inclusion.

- (Objective B, Policy 10) We object to the statement as presently worded. We understand that there is some level of market demand for “small-scale community-oriented visitor accommodations in non-resort areas”, which we understand to mean home and condominium vacation rentals and other transient accommodations for visitors in areas that are not presently zoned/ permitted for hotel/resort/transient accommodations uses, and that in some cases permitting such uses may be beneficial to the City and County overall. However, we do not believe that market demand should be a material factor in any such permitting. We believe instead that the relevant factors should be at least all of: community input; change in nature of community; impact on public improvements and service needs; impact on availability of affordable housing for residents; subjection of permitted uses to fees, taxes, ordinances, regulations and all other government requirements applicable to other hotel/resort uses; full public transparency of all such permitted uses and of means to identify nonpermitted uses; and availability and full funding of review and enforcement mechanisms to identify and prosecute unauthorized uses.

Mahalo for this opportunity to offer these comments on behalf of Outrigger, our hosts and their families, and our guests. Please let us know if we can provide further input.
Dear HHF,

The proposed General Plan draft language of Economic policy 10

"Economic Policy 10: Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively."

is an affront to the grief that our O'ahu is currently suffering. The city has consciously decided to make itself incapable of "enforce effectively" and must be given that direction through the General Plan. To the skeptic, it would seem that the proposed language came from councilmembers and those in the administration bent on opening the gates of hotel operations in our neighborhoods and the afterthought of "enforce effectively" will be tossed out immediately, as has been the record of the past four administrations and councils.

They need the guidance provided by the General Plan.

There is no possible way to ensure that "community-oriented visitor accommodations" will be the outcome of Policy 10. We know that they will quickly fall into more-profitable tourist accommodations just as have the other high-sounding solutions such as ADUs, Ohana housing, CPRs, etc.

Thousands of "community-oriented visitor accommodations" already exist in the form of illegal vacation rentals across O'ahu - recent studies reveal 8,000+ on Oahu. If there is no effort to "enforce effectively" against these, then there is certainly no reason to "permit" more.

If the city is serious about creating REAL "community-oriented visitor accommodations" they must first convince the public that they can enforce - which they have failed miserably. And even when they have gone through effective enforcement, the DPP has reduced fines to near nothing, which then encourages more illegal activity.
The city needs direction from the General Plan - not the direction to create more problems, but the direction to solve them through effective enforcement.

A much more reasonable and effective Policy 10 would read:

"Effectively enforce the law forbidding short-term rentals in residential neighborhoods to bring down rental and housing prices for O'ahu’s residents, restore livability to residential neighborhoods, reduce tourism resentment, aid the revenue-generating legitimate hotel industry with its providers & workers then study the need for very limited community-oriented visitor accommodations"

Larry Bartley
Executive Director
Save O'ahu's Neighborhoods

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This message has been scanned for viruses and dangerous content by MailScanner, and is believed to be clean.
Aloha HHF Planners,

On behalf of our 8,000 members and supporters on O‘ahu, mahalo for considering the comments of the Sierra Club O‘ahu Group regarding the O‘ahu General Plan draft. In general, it should be said that we are pleased with the proposed changes in the General Plan update as many of the Sierra Club O‘ahu Group’s concerns have been given attention. We found the addition of new areas focusing on climate change, sea level rise and renewables to be positive inclusions. Additionally, we welcome the increased focus on mass transit, transit-oriented development, and an Age-Friendly/Complete Streets development approach. Finally, stronger language surrounding the urban growth boundary, preserving the character of certain neighborhoods while still recognizing the need for density, and the inclusion of a substantial amount of language promoting agriculture are appreciated. We hope that the language proposed in these areas is preserved in the final version. However, we do have some concerns.

First, in the Economy section (Objective B, Policy 7) language has been changed from "manage" to "facilitate" with regards to secondary resort areas and the specific destinations of Ko‘olina, Turtle Bay, Hoakalei, Mākaha and La‘ie. The Sierra Club O‘ahu Group is concerned with the stronger encouragement of development in these areas which we believe to be inappropriate. We see this as promoting development outside the primary urban areas and providing a justification for intruding in currently undeveloped areas. This will necessitate further investment of scarce taxpayer resources on infrastructure in rural areas. Given that the city is investing 8 billion dollars on infrastructure in order to concentrate development on the Leeward coast, we believe this encouragement of development in the rural area to be misguided. Moreover, encouraging such increased visitor activity in the Country will place further stresses in areas that have already reached their capacity. For these reasons we strongly recommend that the draft revert to the original language to “manage” these activities.

On a related note, other sections of the General Plan draft have useful language that should be added to the Economy section when evaluating maintenance requirements and proposed construction in resort areas and Waikiki, especially in relation to sea level rise. The Housing and Communities section (Objective C, Policy 6), the Transportation And Utilities section (Objective D, policy 5) and the Public Safety and Community Resilience section (Objective A, Policy 2) contains language addressing the proper evaluation of variables surrounding climate change and development such as: “topography that could be difficult or dangerous, sewer capacity, utility capacity, extreme cost and potential environmental damage.” In these sections, these variables are framed around simply being bad growth that shouldn’t be encouraged or which could potentially incur the City large costs - this framing of perspective should be taken for our
tourism economy. This is especially true when talk of establishing beach preservation funds which would use transfer of development rights (TDR) and purchase of development rights (PDR) which could be exorbitantly more costly for the City/State if not guided by language and policy which expects these same considerations from the tourism industry. The addition of this language could help prevent significant financial cost and damage to the environment.

In the Physical Development and Urban Design section, the new addition of Policy 6 on page 50 allows for short-term vacation rentals in TOD areas - the Sierra Club O‘ahu Group does not support this. The O‘ahu Group understands the many values of TOD, one of those being its power to control sprawling and uncontrolled growth by placing our residents closer to where they live, work and play; taking away more of the available area in TOD neighborhoods and giving it to non-residents does not facilitate this. This type of activity should be strictly prohibited outside of our resort areas and Waikiki, as it is counterproductive.

Language relating to deregulation exists in both the Housing Communities section (Objective A, Policy 2) as well as in The Economy section (Objective C, Policy 4). The O‘ahu Group recognizes that some regulation is indeed burdensome, especially for the farmers mentioned in Objective C, Policy 4. We strongly support an increase in local agricultural production, however we would welcome additional language to clarify that this increased activity would not fly in the face of environmental impact, pesticide, water quality, and invasive species regulations.

Finally, the Energy section (Objective A, Policy 6) promotes an impressive suite of renewable energy resources and the Sierra Club O‘ahu Group supports the emphasis on producing renewable energy for O‘ahu. However, it should be mentioned that with regards to geothermal and its listed prospects in both Wai‘anae and Windward, the national Sierra Club supports geothermal, but not hydraulic stimulation or "fracking" which the newest forms of geothermal now use. If language can be added that steers O‘ahu away from this process which can pollute groundwater and increase seismic activity, then it should be done.

Again, the Sierra Club O‘ahu Group thanks you for your time and interest in our comments. If you have additional questions please do not hesitate to contact our staff and board at your convenience.

Mahalo,

Elliot Van Wie

Executive Committee Member, Conservation Chair & Smart Growth Chair, Sierra Club O‘ahu Group
The following comments on the draft revision of the Oʻahu General Plan are respectfully submitted by:

Patricia Morrissey, PhD, Director (pmorris@hawaii.edu, 808-956-2065)
David Leake, PhD, MPH, Specialist (leake@hawaii.edu, 808-956-0820)
Center on Disability Studies
University of Hawaiʻi at Mānoa
1410 Lower Campus Rd., 171F
Honolulu, HI 96822

Last year, our Center on Disability Studies (CDS) at the University of Hawaiʻi at Mānoa completed a study through an MOA with a consortium of nine State and County agencies involved in housing issues. This study met a requirement of the US Department of Housing and Urban Development that jurisdictions receiving Federal funds for housing must regularly report on impediments to fair housing choice and describe steps to be taken to reduce those impediments.

The nine agencies decided that this report should focus on people with disabilities, because for quite a few years “disability” has been the most common basis for complaints of housing discrimination in Hawaiʻi. This study is entitled “Analysis of Impediments to Fair Housing Choice with a Focus on People with Disabilities” and is available as a free download at http://www.cds.hawaii.edu/sites/default/files/imce/downloads/projects/Fair-Housing-Project-Report.pdf

We believe that the revision of the Oʻahu General Plan should take into consideration the impediments identified and the proposed steps to remedy them, as described below. These comments are based on CDS’s analysis of the available information but should not be considered the position of the University of Hawaiʻi or its College of Education (where CDS is located).

The most substantial impediment to fair housing choice for people with disabilities identified by our study is the severe lack of housing that is both affordable and accessible to people with mobility difficulties. People with disabilities tend to be highly overrepresented at the lower income levels, and it is commendable that the current draft revision of the Oʻahu General Plan strongly promotes increasing the stock of affordable housing. However, the current draft could take a stronger position on accessible housing.

Rather than “accessible housing” our report used the term “visitable housing” in line with a national trend away from viewing housing solely as a domicile for individual households and towards a broader perspective that gives priority to promoting strong interpersonal relationships within communities. From this perspective, everyone, including people with mobility challenges, should be able to easily visit each other in their homes. Currently, many people with mobility challenges are unable to visit or be welcomed by their neighbors and suffer from social isolation as a result.

Another major social problem addressed by visitable housing is the all too frequent need for people to be placed in institutions as they age and become unable to fully care for themselves. The preferred alternative for most elderly people is be able to age-in-place, which they are more likely to be able to do in a home they can easily navigate with a wheelchair, walker, or cane, and which has an accessible bathroom with grab bars so they can bathe and use the toilet on their own.

The following six home features are needed to be certified at the lowest level of accessibility (called Type C) according to the International Code Council ("ICC")/American National Standards Institute ("ANSI") A117.1 Standard on Accessible and Usable Buildings and Facilities:
HOUSING

The Hawaii General Plan should add the concept of “visitability” to the term “affordable housing.”

A general recommendation is that the term “affordable housing” be replaced throughout the O’ahu General Plan by a term that adds the concept of visitability. Our preferred term is “visitable affordable housing” (or “affordable visitable housing”). If it is determined that “accessible” is more readily known and understood, an alternative might be “accessible affordable housing” which is used by the non-profit Housing Hawaii organization in the introduction to its platform statements (available at http://www.housinghawaii.org/UserFiles/File/HHplatforms.pdf), as follows: “Housing Hawaii is a broad coalition of public, private, and nonprofit organizations dedicated to creating, preserving, and supporting accessible affordable housing for all through advocacy, education, and development.” The same term is used in the Housing Oahu: Islandwide Housing Strategy draft of 2015 (available for download at www.honolulu.gov/rep/site/ohou/ohou_docs/Housing_Strategy_Draft_9-8-15) where one of the sections on updating policies and regulations is entitled “Improve the 201H Process to Create More Accessible Affordable Housing” (page 24).

Our suggested revisions for specific sections of the O’ahu General Plan are indicated below with double underlines and double-strikethroughs.

PREAMBLE

19. HOUSING AND COMMUNITIES

Obtaining decent, reasonably priced homes that are visitable and located in safe and attractive neighborhoods has been a perennial problem for the residents of O’ahu, and is a primary concern of the General Plan. This section recognizes the importance of developing whole communities that are well integrated with the surrounding land uses and natural environment.

20. The objectives and policies for housing seek to ensure a wide range of housing opportunities and choices; to increase the availability of affordable housing that is both affordable and visitable; high-density housing via mixed use and transit-oriented developments; to increase the use of sustainable building designs and techniques; to reduce speculation in land and housing; and address issues associated with homelessness so that all people have shelter.
SECTION IV. HOUSING AND COMMUNITIES

157. **OBJECTIVE A**
   To ensure a balanced mix of visitable housing opportunities and choices for all residents at prices they can afford.

158. **Policy 1**
   Support programs, policies, and strategies which will provide decent visitable homes for local residents at the least possible cost.

163. **Policy 6**
   Maximize local funding programs available for visitable affordable housing.

165. **Policy 7**
   Provide financial and other incentives to encourage the private sector to build visitable homes for low- and moderate-income residents.

166. **Policy 8**
   Encourage and participate in joint public-private development of low- and moderate-income visitable housing.

170. **Policy 11**
   Encourage the construction of visitable affordable homes within established low-density and rural communities by such means as ‘ohana’ units, duplex dwellings, and cluster development that embraces the ohana concept by maintaining multigenerational proximity for local families.

171. **Policy 12**
   Promote higher-density, mixed use development, including transit oriented development, to increase the supply of visitable affordable and visitable market homes convenient to jobs, shops and public transit.

172. **Policy 13**
   Encourage the production and maintenance of visitable affordable rental housing, ohana housing, and accessory dwelling units.

173. **Policy 14**
   Encourage the provision of visitable affordable housing designed for the elderly and people with disabilities in locations convenient to critical services and to public transit. the handicapped.

176. **Policy 17**
   Support programs to address all facets of homelessness, so that every homeless person has a visitable place to stay, along with the infrastructure and support services that are needed.

177. **OBJECTIVE B**
   To minimize reduce speculation in land and housing.

181. **Policy 4**
   Require government-assisted subsidized housing to be visitable and to be delivered to qualified appropriate purchasers and renters.

184. **OBJECTIVE C**
   To provide residents with a choice of living environments which are reasonably close to employment, recreation, and commercial centers and which are adequately served by transportation networks and public utilities.
185. **Policy 1**
Ensure that residential developments offer a variety of visible homes to people of different income levels and to families of various sizes to reduce large household sizes and alleviate the existing condition of overcrowding.

186. **Policy 2**
Encourage the fair distribution of low- and moderate-income visible housing throughout the island.

194. **Policy 8**
Encourage the military to provide visible housing for active duty personnel and their families on military bases and in areas turned over to military housing contractors.

**SECTION VII. PHYSICAL DEVELOPMENT AND URBAN DESIGN**

314. **OBJECTIVE E**
To maintain those development characteristics in the urban-fringe and rural areas which make them desirable places to live.

319. **Policy 5**
Encourage the development of a variety housing choices including visible affordable housing in rural communities to replace lost housing inventory, and give people the choice to continue to live in the community that they were raised in.

321. **OBJECTIVE F**
To create and maintain attractive, meaningful, and stimulating environments throughout O‘ahu.

325. **Policy 2**
Require the consideration of urban design and universal design principles in all development projects.

**NOTE:** “Universal design” refers to making environment and structures as usable as possible by people of all ages and abilities. A well-known universal design feature is the curb cut, a sloping break in a concrete street curb that enables baby strollers, roller blades, bicycles, and wheelchairs to move smoothly between roads and sidewalks. Visible housing also adheres to universal design principles.

336. **OBJECTIVE G**
To promote and enhance the social and physical character of O‘ahu's older towns and neighborhoods.

338. **Policy 2**
Encourage, wherever desirable, the rehabilitation of existing substandard structures, including the addition of visitability features when feasible.

342. **Policy 6**
Support and encourage cohesive neighborhoods which foster interactions among neighbors, promote vibrant community life, and enhance livability, all of which will be promoted through increasing the proportion of homes that are visible.

378. **Policy 8**
Support becoming an age-friendly city that provides people of all ages with user-friendly parks and other public gathering places, that offers safe streets and multimodal transportation options, that provides an adequate supply of visible affordable housing, that encourages growth in needed and desirable jobs, that provides quality health care and support services, and that encourages civic participation, social inclusion, and respect between interest groups.

**NOTE:** An action plan currently being implemented to make Honolulu an age-friendly city (available for download at www.honolulu.gov/rep/site/dts/dts_docs/Honolulu_Age-Friendly_City_Action_Plan_2015.pdf) includes the recommendation "Promote basic accessibility
requirements” through the action “Adopt ‘visitability’ regulations in new construction” (page A15). An age-friendly city will also support aging in place. A report issued in 2011 by the State Legislature’s Home for Life Task Force identified visitable housing as critical for enabling the aging-in-place for Hawai‘i’s seniors, who are growing at such a fast pace that it has been described as a “silver tsunami” that threatens to overwhelm the state’s health and social service systems. This report (available for download at http://lrbhawaii.info/reports/legrpts/legis/2012/scr7_sd1_09.pdf clearly explains the social and financial benefits of investing in visitable housing.
Individuals
To Whom It May Concern,

As a 40 year resident of rural Oahu, I IMPLORE YOU to protect this precious island asset at all costs -- for future generations, for the future of this fragile island, and for the future of the State of Hawaii.

The unfettered and un-managed RUNAWAY COMMERCIALIZATION of this most beautiful area of Oahu MUST STOP immediately. Needless damage is being done to the peaceful enjoyment of the rural Oahu environment by the many, many grimey 'food truck camps', in-your-face 'surf school' truck ads, illegal vacation rentals, and overwhelming intrusions by gigantic tour bus companies.

The Oahu General Plan MUST REAFFIRM that any and all future growth and development protect rural Oahu by keeping large-scale development and commercialization within designated urban boundaries.

Please SUPPORT THE FOLLOWING:
1. The Plan should RETAIN and RESTORE (!) the existing references to limiting Oahu's population growth in the currently adopted General Plan;
2. The Plan should NOT ALTER and expand the purpose of the document from PRIMARILY SERVING THE NEEDS OF OAHU RESIDENTS - to addressing the needs of Oahu visitors;
3. The Plan should NOT create new allowances for alternative accommodations, such as vacation rentals, in NON-RESORT areas THROUGHOUT OAHU;
4. The Plan should NOT newly designate Laie as an official 'resort' area for Oahu;
5. The Plan should NOT create newly expanded areas for the Rail Project's so-called transit oriented development (TOD) beyond the rail route in order to allow high-density development and developer give-aways throughout Oahu;

****AND FINALLY****
6. The Plan should NOT provide new allowances for development outside the existing urban core. THE PLAN SHOULD RETAIN THE CURRENT PROTECTIONS FOR RURAL COMMUNITIES IN THE CURRENTLY ADOPTED GENERAL PLAN.

I just want to know -- WHEN WILL THE WORKING RESIDENTS AND CITIZENS OF THIS ISLAND BE HEARD BY DECISION-MAKERS???

Please listen to people who live here and have no other place to go. Please stop the sell-out to outside money and give Hawaiians and residents a VOICE IN THEIR GOVERNMENT.

Mahalo and Aloha,
Mrs. Dorothy Aeto
Haleiwa Hawaii
TO: Helbert Hastert & Fee

RE: Comments for the Oahu General Plan 2035

Aloha,
The ( 5 page )attachment above are my comments and opinions for the Oahu General Plan. I am a long time resident of Hawaii, more than 50 years, residing mostly on the North Shore near Haleiwa. My profession is as a Realtor for the past 39 years. Thank you for the opportunity to provide these comments.
Aloha,
Diane M. Anderson
General Plan Comments

Preamble
Page 11, Section 24 Physical Development and Urban Design
- New language that discusses rural areas growing organically – what does that mean?

Page 13, Section 29 Culture and Recreation
- New focus on the visitor. Moving forward in this document, lots of references to residents and visitors. It feels that the focus on residents is either being subsumed or being made co-equal with visitors.
- Changes should be focused on the residents not visitors. If positive improvements are made for those of us who live on Oahu, visitors will benefit.

1. Population
Page 22, Section 52, New Objective A
To plan for future population growth in a manner that considers the limits of Oahu’s natural resources, that protects the environment, and that minimizes social, cultural, and economic disruptions.
- Not sure what this means. Sounds as if we are going to allow unfettered growth. Nothing in the policies talk about overpopulation and the island’s carrying capacity.
- Need clear definitions related to the distinction between controlling population growth, and/or continued focus on managing population growth.

Page 23 Section 69, Policy 4 Distribution of Residential Population
- What is the 2040 population that these increases are based on?
- Currently the population of the North Shore is about 15,000. Total Oahu population as of July 1, 2016 is 992,605. This means North Shore has about 1.5% of total Oahu population. We are already busting at the seams when you add 5,461,880 visitors coming to Oahu (61% of 8,941,394 total visitors in 2016) and in a 2007 survey it was shown at least 50% come to the North Shore or 2,730,940 annually or 227,578 monthly. This is stressing our aging infrastructure greatly.
- The current state goal is more visitors. This is not sustainable giving the limited space on our island. If for example, Oahu’s population grows to 1.2 million by 2040 with 2% to the North Shore, we are talking another 207,395 residents on Oahu with 4,148 going to the North Shore. That is almost 20,000 North Shore residents. We are busting at the seams as it is with the addition of visitors to the mix. This increase IS NOT sustainable or healthy for our community.
- Do not expand the purpose of the document from primarily serving the needs of Oahu residents - to addressing the needs of Oahu visitors.
- The Plan should retain and restore the existing references to limiting Oahu’s population growth in the currently adopted General Plan;
2. The Economy
Page 26, Section 80, Objective B
To maintain a successful visitor industry that creates meaningful employment, enhances quality of life, and celebrates our unique sense of place, natural beauty, Native Hawaiian culture, and multi-cultural heritage.
  - An increase in North Shore population especially without sufficient infrastructure investment will not do any of the above and only strain what we have and decrease the quality of life for our community.

Page 26, Section 83, New Policy 3
Guide the development and operation of visitor accommodations and attractions in a manner which avoids unsustainable increases in the cost of providing public services and which also respects existing lifestyles, cultural practices, and natural and cultural resources.
  - This appears to be a veiled policy to support growth within the vacation rental industry. Have the visitors stay in houses already built so no more hotels need to be built. However, given the number of visitors to Oahu – 5 million plus annually, and the amount of illegal TVUs already on the books, most of Oahu will not be for the residents but for the visitors.

Page 26, Section 84, New Policy 4
Provide for the long-term viability of Waikiki as a world-class visitor destination and as Oahu’s primary resort area by giving Waikiki priority in visitor industry related public expenditures and by encouraging private investment in enhancing facilities and attractions that support the visitor industry.
  - So more visitors to Oahu, more to the North Shore, more residents on the North Shore but no money for the North Shore. Spend it all in Waikiki. This is social injustice not just for North Shore but for the rest of Oahu. We need to have our property taxes spent in our community.

Page 27, Section 90, New Policy 7
Facilitate the development of the following secondary resort areas: Ko Olina Resort, Turtle Bay Resort, Hoakalei Resort at Ocean Pointe, Makaha Valley, and Laie.
  - The Plan should not newly designate Laie as an official “Resort” area for Oahu;

Page 27, Section 91, Old Policy 7
Manage the development of secondary resort areas in a manner which respects existing lifestyles and the natural environment, and avoids substantial increases in the cost of providing public services in the area.
  - You can’t have a resort without infrastructure. Is this another veiled reference to significantly expanding TVUs?
• The Plan should not create new allowances for alternative accommodations, such as vacation rentals, in non-resort areas throughout Oahu.

Page 27, Section 95 New Policy 10
Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively.
  • You have just stated to focus on Waikiki so you don’t have to worry about increased infrastructure. This will allow proliferation of visitor accommodations outside of Waikiki and the other already designated resort areas on Oahu.

Page 27, Section 96, Objective C
To ensure the long-term viability and continued productivity of agriculture on Oahu.

Page 28, Section 101, New Policy 4
Remove overly-stringent and costly regulatory impediments that hinder a producer’s ability to develop, market, and distribute locally grown food and products. This is vague. What does it mean? Are there examples?

Page 29, Section 118, New Policy 16
Incorporate into planning documents the scenic value of agricultural lands as an open-space resource and as a valuable tourist amenity, and plan ways to make associated rural communities be part of this desirable scenic resource.
  • Are we talking about food sustainability and growing food or again providing more activities to tourists?

III. Natural Environment and Resource Stewardship
Page 34, Section 152, Objective B
To preserve and enhance natural landmarks the natural monuments and scenic views

Page 34, Section 155, Policy 3
Locate and design public facilities, infrastructure and utilities to minimize the obstruction of scenic views.
  • Open up view plans where vegetation obstructs views and provide for pull offs to take pictures read informative signs etc.

VI. Energy
Page 45, Section 240, Objective A
To increase energy self-sufficiency and maintain an efficient, reliable, resilient, and cost-efficient energy system.

Page 45, Section 247, New Policy 4
Promote and assist efforts to optimize the use of all proven sources of renewable energy.
  • No windmills on or off shore.
VII. Physical Development and Urban Design
Page 49, Section 276, Objective A
To coordinate changes in the physical environment of Oahu to ensure that all new developments are timely, well-designed, and appropriate for the areas in which they will be located.
  - Add other impacts as inadequate street parking

Page 49, Section 277, New Policy 1
Provide infrastructure improvements to serve new growth areas, redevelopment areas and areas with badly deteriorating infrastructure.
  - Add inadequate to this policy.

Page 50, Section 284, Policy 6
Facilitate transient-oriented development in transit station areas to create live/work/play multi-modal communities that reduce travel and traffic congestion. The Plan should not create newly expanded areas for the Rail Project’s so-called transit oriented development ("TOD") beyond the Rail Route in order to allow high-density development and developer giveaways throughout Oahu.

Page 53, Section 314, Objective E
To maintain those development characteristics in the urban-fringe and rural areas which make them desirable places to live.
  - The Plan should not provide new allowances for development outside of the existing urban core. The Plan should retain the current protections for rural communities in the currently adopted General Plan.

Page 53, Section 318 Revised Policy 4
Maintain vibrant rural areas that reflect a relatively open and scenic setting, dominated by small to moderate size agricultural pursuits, with small towns of low density and low rise character, and which allows modest growth opportunities to address area residents future needs.
  - What does “relatively” mean in this context?
  - How does this policy work with the above policies regarding visitor accommodations? Those policies seem to be in conflict with this policy.

Page 54, Section 320, New Policy 6
Ensure the social and economic vitality of rural communities by supporting infill development and modest increases in heights and densities around existing rural town areas where feasible; and modest adjustments to growth boundaries to maintain an adequate supply of housing for future generations.
  - How does this work with the North Shore Sustainable Communities Plan?
  - Who decides on the modest adjustments to the growth boundaries?
  - Who decides what constitutes a modest increase in height and density?
Page 54, Section 321, New Objective F
To create and maintain attractive, meaningful, and stimulating environments throughout Oahu.

Page 54, Section 322, Deleting Old Policy 1
Prepare and maintain a comprehensive urban design plan for the Island of Oahu. Deletes policies calling for a comprehensive urban design plan. "We need good comprehensive planning now more than ever.

X. Culture and Recreation
Page 66, Section 411
Objective D
To provide a wide range of recreational facilities and services that are readily available to all residents and visitors alike and that balances access to natural areas with the protection of those areas.

Page 67, Section 413, Revised Policy 2
Develop maintain, and expand a system of regional parks and specialized recreation facilities, based on the cumulative demand of residents and visitors.
- Does this mean money will be spent on the North Shore to ensure our parks in maintained? Previous statements indicate more money will be spent in Waikiki.

Page 67, Section 421, Revised Policy 8
Encourage ocean and water-oriented recreation activities that do not adversely impact on the natural environment and cultural assets, or result in overcrowding or overuse of beaches, shoreline areas and the ocean.
- Our beaches are already overcrowded. This goes back to the population numbers.
- Kaena Pt used to be a quiet area, now on any given weekend, it is very busy and no longer offers a quiet respite for the community.

General Comments
- Combining “recreation” with “cultural” as a single category was inappropriate. They are both important and often not related. The Plan should Hawaiian words in the document or both English and Hawaiian words [e.g. Diamond Head/Leahi]
- Plan talks about planning an orderly sequence for future development. What does that mean? Recommend infrastructure come first.
- Allocate funds from the City and County's capital improvement program for public projects that are needed to facilitate development of the secondary urban center at Kapolei Add in a fair and equitable way. Along with the funding to Waikiki, it would appear there will be nothing left for the rest of the communities on Oahu.
On Sun, May 7, 2017 at 4:57 PM, andrea anixt wrote:

> To: gp2035@hhf.com
> May 8, 2017 Comments on O'ahu General Plan 2010-2035
> From: Andrea Anixt
>
> Ka'awa,,Hl. 96730

> I oppose changing the focus of the General Plan from directed growth areas of Honolulu to all of O'ahu.
> Tax monies for infrastructure have gone to Ewa/Second City for many years now and all Ko'olauloa Community Associations, (except Laie), the Kahalulu, Kailua, North Shore, Manoa, Miliiani/Waipio/Melemanu and Makakilo/Kapolei Honokai Hale Neighborhood Boards, have made Resolutions against developing a ‘Third City’ in Ko'olauloa.
>
> The O'ahu Metropolitan Planning Organization's (OMPO) Oahu Regional Transportation Plan 2040 (ORTP) has only long range projects slated from Haleiwa to Kahalu'u in the 2029-2040 time frame. Temporary emergency fixes to Kamehameha Highway Route 83, that sole single access road, are being overwhelmed by rapid high wave erosion. Sea level rise is to only make these conditions worse and is being adjusted upwards currently per SOEST and/or NOAA (Chip Fletcher of UH's study).
>
> The Department of Emergency Management has advised area residents to have 30 days food and water supply for natural disaster preparedness. The DEM estimates 5.2 to 6.2 hours to evacuate the area. The tsunami from the Aleutian Islands in Alaska (potentially Extreme Tsunami besides) will get here in 4 hours. This road carries about 3.5 million tourists annually now in addition to portions of the de facto resident population of 1,029,798. 1% population growth goal in Ko'olauloa is nearly 11,000 people;
>
> plus there is a partial DPP count of 4,356 already zoned Urban vacant lots under 20 degree slope mostly privately owned towards infill of nearly 22,000 population increase. The 2010 census count of Ko'olauloa was 16,732 and traffic is already fully saturated much of the time per OMPO. Gridlock and road flooding are too common.
>
> This is also the furthest vehicle miles traveled area from the Primary
Urban Core jobs, etc. Responsible and sustainable Planning should not include this 'more people, more problems' situation. There has been only deferral and deletion of most work on this highway corridor so far...

I oppose detaching TOD from the Honolulu rail corridor and allowing TOD in every community, especially Ko'olauola.

I oppose the promotion of higher density and mixed use development as a policy for all areas regardless if the community is rural and not in the Sustainable Communities Plan.

I recommend that Housing and Communities Page 10, #20 be deleted.

It implies that Transit oriented developments are desired and appropriate for all communities on O'ahu.

The bus stops are our only 'transit' stations in Ko'olauola.

Islandwide there are 3,837 bus stops. Route 83 has few places appropriate for TOD, and definitely increased density is not desired in remaining rural areas.

I oppose all changes to the Urban Growth Boundaries at Malaekahana ahupua'a in Ko'olauola in particular, and in this Plan generally. The Development Plans and SCP's defined those for stakeholders already islandwide. Directed growth to the PUC and Ewa area is all that I can support within 2010-2035 time frame

I point out that the 4,356 partial DPP count of privately owned lots/lands in Ko'olauola will provide the Plan's "organic fashion" for generations to remain in their home towns: should be adding "where infrastructure is existing and not before" in reference to Physical Development and Urban Design section p.11. Source = Planning Commission Hearing in 2013. FULL "Conditions" on DPP not met yet for passing the KLSCP in 5/2017 that I know of.

I support a carrying capacity study for O'ahu population.

Population, Objective A, policy 2. Since none exists and sea level rise is threatening much low lying housing, shoreline setbacks need to increase for all new construction so that population potential is also adjusted lower, (inland over 200 feet from shoreline by 2100), so population growth is actively discouraged, and thereby safety is emphasized regarding the people who live here. The birth rate is higher than the death rate, so even out-migration is not enough. Access to family planning is possibly becoming less available with Planned Parenthood's funding in question. The original OGP addressed this. Why not now?

I support that the words 'to prevent urban sprawl' be added after the word boundaries = "Development is contained within growth boundaries: to prevent urban sprawl " in Population, Policy 3.

I oppose designating all of Laie a Resort area. This was a 49 unit motel designation nodule area zoned Resort that would now allow large scale development in Laie.

There are already 725 visitor units to be allowed at Turtle Bay Resort with an additional daytime population add of 4,400 per their SEIS. That is an estimated 12 year build out on our 2 lane road that
> is eroding into the sea now. It is being a one lane road frequently as
> it is now due to emergency and scheduled bridge repairs, etc. Delete
> from the Economy, policy 10 please. All resort development additional
> populations do not count in the OGP's 1 or 1.4% growth for Ko'olauloa.
> Only what is considered permanent residential housing is counted.
> I oppose allowing short term vacation rentals in residential zoned
> non-resort areas. There is possibly 'demand' for these, but in
> Ko'olauloa 69% of all rentals are these illegal unpermitted transient
> vacation units already.
> ((Our former State House Rep a year ago =this source).
> That did not include the nearly thousand students of BYUH that are in
> rentals. More than 5 unrelated people in housing is also illegal, with
> 10 being common in Laie area. This mainly has contributed to a lack of
> lower cost rentals.
> Of the 4500 Air B & B units on Oahu, 2500 are
> owned by 500 people or companies (Air B & B included). There are many
> more TVU rental sources than them online and on Craig's List. The DPP
> has not shown the ability to enforce the rules on offenders, only 7
> citations in District 23 (per our State Senator), which has over 1100 known TVU's.
> More of Transient Vacation Units are not desirable whether visitors
> want them or not is my position. The as yet not passed Ko'olau Loa
> Sustainable Communities Plan has BYUH doubling its student body (plus
> staff). If allowed, this should be on-campus (100 acre campus) housing only. It adds over 3,000 population also.
> I recommend language supporting farms and farming.
> along the windward, North Shore, Waianae coasts that was in the
> original OGP. We support the protection of all farms from
> urbanization, not just IAL designated land.
> I recommend deleting Policy 12 of Housing and Communities Objective A.
> Preventing residential development outside the PUC and Second City
> areas should remain/ become the over-riding policy.
> I recommend that Energy Objective A section, policy 6 eliminate d.
> geothermal energy from being considered in all areas on O'ahu - the
> hotspot areas of O'ahu at Kailua, Kaneohe, and Waianae are not good
> places for the fracking methods for this type of energy. No place on
> O'ahu is as long as that is the method.
> I support Deletion of Physical Development and Urban Design Objective
> E, #320, Policy 6 (page 54) in its entirety. No growth boundary
> adjustments are desired, not large or modest ones; nor changes to Land
> Use Ordinances that would allow them.
> The same Deletion is recommended for #319/Policy 5 (page 53). It is
> NOT sustainable development to take everything and develop it for
> this generation 's wants. We must consider future generations needs
> and the removal or use of resources this much development already is
> having on O'ahu. Affordable housing and all infrastructure is in Ewa
> by design of directed growth. It may very likely NOT be in the
> community we were raised in on O'ahu. People need to plan for this
> I support changing Cultural and Recreation Objective A, Policy 1
> 'encourage the recognition' with:  "Recognize" the Native Hawai'ian
> host culture, including its customs, language, history and close
> connection to the natural environment as a dynamic, living culture
> and as an integral part of O'ahu's way of life.
> The Association of all the Hawai'ian Civic Clubs supported no
> development of a 'Third City' in Ko'olauloa by Resolution also. The
> OGP needs language to support the Hawai'ian sustainable planning to
> the 7th generation ...of preserving a beautiful rural, agricultural (and scenic open space) that is an integral part of this
> culture and mine. That is what is more important to all referenced other community groups in this Comment, and to the Sierra Club, the Defend Oahu Coalition, and more. Respect, preserve and honor this native Hawai'i'an home and the aina over the visitor population as a primary consideration in this OGP document for this and sustainable future planning.
> I support the recommendations of Kahaluu Neighborhood Board, Kailua
> Neighborhood Board, and others on many points in the OGP.
> Mahalo for any changes made to accommodate our ideas on the O'ahu General Plan.
> Sincerely,
MAY 5, 2017
HHF Planners, ATTN: Oahu General Plan
733 Bishop Street, Suite 2590

Aloha HHF,

SUMMARY

Please do not advance the Oahu General Plan (OGP) until the government for the State of Hawaii has concluded its survey of Pueo on Oahu.

Taxpayers have waited decades for the State of Hawaii's Department of Land and Natural Resources (DLNR) to conclude and bring forth findings of how many of the endangered Pueo are left on the island of Oahu and where the Pueo might still be proliferating.

Hundreds of thousands of dollars have gone into research thus far in this undertaking - to survey for Pueo- and a researcher from South America was hired and brought in specifically to Oahu to identify and quantify the existence of Pueo. This is a big deal- just ask the Hawaii State Senate that voted 25-0 on the subject to get the Pueo the attention it deserves.

In the urgency to quantify the status of the Pueo, the Hawaii State Senate passed Senate Resolution 6 SD1 (HSL 2017) to urge the DLNR identify all habitat conducive to the Pueo- such as where is the habitat for Pueo located, how many acres of habitat still exist, who owns the property, and so forth.

Currently, taxpayers are waiting for the data; the findings from the Pueo survey to be released. Therefore, any disposition thereof, or disposal of property, or otherwise liquidation of landholdings for development purposes that are decided prior to the Pueo Survey being published, would be counterproductive and deemed premature.

In conclusion, I have included a brief overview of the status of the Pueo and its plight on Oahu and urge you to return to the review process for the OGP after the scientific data on the Pueo has been substantiated.

The public may want to include and create/designate land toward the objective of preserving Pueo habitat in the OGP- and identify a Pueo Park, Pueo Sanctuary, Pueo Preserve, Pueo Refuge, or Pueo Center of some kind before it's too late and the Pueo eventually become extirpated from the Leeward Coast/Honouliuli Region/Ewa Plain.
OAHU GENERAL PLAN DECIMATES NATIVE HAWAIIAN CULTURAL PRACTICES

To sum it up, the Oahu General Plan (OGP) as presented, lacks critical data to properly carve up the island for specific land use endeavors.

First, an islandwide survey of where our endangered and threatened flora and fauna are located, and an idea of how many of each specie are left at these locations must be made known and included in the decision making process.

The eminent loss of habitat for the endangered Hawaiian Duck, Coot, Hoary Bat, Hawaiian Owl (Pueo), and various species of endangered bees, migratory birds, and various species of insects on the verge of extinction is missing from the OGP map.

MISCHARACTERIZATION OF THE INNER COASTAL WETLANDS OF THE EWA PLAIN

The Environmental Impact Statements (EIS) reviewed by the State Land Use Commission, Planning Commission, and the State’s Department of Land and Natural Resources (DLNR), contained a bias when liquidating preservation and farmlands for development. The bias was, that for decades, specific endangered bird species on the Ewa Plain were extirpated long ago via extensive farming practices and the encroachment of dogs, cats, mongoose, cane toads, and other noxious and or invasive plants.
During the inventory process to convert property on the Ewa Plain, it was a given that the person hired to do the inventory (EIS) for the property had a prearranged misconception of a scenario and concluded from the onset, that the property in Ewa once used as farmland, was now “wasteland.”

In each EIS undertaken (excluding the Red Ilima for the North South Road), it was concluded that no animals or plants of significance were or could be on the property or in need of preservation or protection due to the adverse pre-conditions (farming practices) on the property that existed for decades.

In every EIS produced to develop the Ewa Plain, the conclusion or findings were that endangered birds no longer frequented or utilized the area due to intensified farming practices that extirpated the birds from the property. The portrayal of the land on the Ewa Plain was always characterized as land that was disposable and held no worth to endangered birds due to the wild dogs, cats, rats, mongoose and cane toads that took over and ravaged the environment for Pueo beyond repair.

**MIGRATORY AND ENDEMIC BIRD SPECIES OMITTED IN LAND USE SURVEYS**

In 2017, the Hawaii State Senate passed Senate Resolution 6 (SR 6 SD1 [http://capitol.hawaii.gov/measure_indiv.aspx?billtype=SR&billnumber=6&year=2017](http://capitol.hawaii.gov/measure_indiv.aspx?billtype=SR&billnumber=6&year=2017)) on the grounds that knowing what habitat remains for the Pueo on Oahu is of value. At this time, the State of Hawaii and the City and County of Honolulu have no data as to where, how many, and of what health the population of Pueo remaining are in… meaning, the status of Pueo on Oahu is completely unknown until such data comes forth.

In addition to not knowing how many Pueo are left on Oahu and where they may still be, Hawaii’s State Senate in 2017 introduced Bill 570 ([http://capitol.hawaii.gov/measure_indiv.aspx?billtype=SB&billnumber=570&year=2017](http://capitol.hawaii.gov/measure_indiv.aspx?billtype=SB&billnumber=570&year=2017)) to address this unknown. The intent of SB57 was to enhance the survey process for locating and identifying Pueo in order that during the EIS exercise, a more adequate and thorough search for endangered Pueo would take place.

As it stands, the Office of Environmental Quality Control accepts and approves of protocol to search for endangered plants or animals that involves a mere few hours on the grounds. For example, in the liquidating of 500 acres of prime agricultural land in Ewa in order to construct the University of Hawaii West Oahu Campus, the inventory to search for Pueo on the property within the EIS transpired for just a few morning hours on one day. One person concluded in their few hours of search, that the 500 acres was void of any Pueo. SB570, if passed, was to mandate the inventory for Pueo take place for a minimum of five days.

Obviously, to make the determination that absolutely zero Pueo existed on the entire Ewa Plain, and that all Pueo were extirpated within the scope of the Second City, it was necessary to advance faulty EIS’s, allow flawed protocols to be administered, and permit the scientific observations actually taken on the grounds themselves, to be skewed with misconceptions.

The evidence to substantiate that the EIS’s performed for the entire Ewa Plain were wrought with fraud, laden with ill-will, done with deceit, and carried out with malfeasance to cause harm to the Pueo, are captured in the videos provided for proof- (see list of videos pasted below).

Remember now, all seventy-six Hawaii State Legislators, the Governor of Hawaii, the Mayor of Honolulu, and the entire Honolulu City Council all claim in unison, in totality, that there are absolutely no Pueo remaining alive in all of Ewa.

What do these videos communicate to you- what do you see in them? If you see and conclude that there indeed are Pueo in these videos, then by law, a Supplemental EIS is supposed to be triggered and a Habitat Conservation Plan (HCP) executed for the Pueo by the DLNR.
PUEO HABITAT CONSERVATION PLAN COMES FIRST

Until the State of Hawaii’s Department of Land and Natural Resources has concluded its islandwide survey of Pueo, it would be negligent and inappropriate for the City and County of Honolulu’s City Council to codify and approve of the current OGP as presented.

A Pueo Sanctuary, Pueo Park, Pueo Refuge, Pueo Preserve, or designated territory for the endangered specie in some fashion, must be identified first and foremost and included in any OGP that is brought forward for adoption.

Until a HCP is executed for the Pueo within the Honouliuli Ahupua'a, the OGP stands to extirpate the Pueo and this must be prevented.

Sincerely,

Tom Berg
Ewa Beach, Hawaii 96706

(Chronologically Listed- Video Evidence of the Ho’opili /UHWO Pueo):

https://www.youtube.com/watch?v=d9fmJk4--CY

https://www.youtube.com/watch?v=uDtwaLzalxKc
August 9, 2016 @ UHWO
https://www.youtube.com/watch?v=f3T-VhYEi2c

August 15, 2016 @ UHWO
https://www.youtube.com/watch?v=8DIYNDLVi6A

August 17, 2016 @ UHWO
https://www.youtube.com/watch?v=U4JYSohgV0

August 20, 2016 @ UHWO
https://www.youtube.com/watch?v=JS3GClmESc

August 27, 2016 @ UHWO
https://www.youtube.com/watch?v=dEqIzG26H24

August 28, 2016 @ UHWO
https://www.youtube.com/watch?v=vzRWuv_0dyA

August 30, 2016 @ UHWO
https://www.youtube.com/watch?v=XRFYH-0cEaM

August 31, 2016 @ UHWO
https://www.youtube.com/watch?v=AznT06PmzoA

September 19, 2016 @ UHWO
https://www.youtube.com/watch?v=4UzUmqu3IYM

September 21, 2016 @ UHWO
September 29, 2016 @ UHWO
https://www.youtube.com/watch?v=buFCNg_SWiU

October 7, 2016 @ UHWO
https://www.youtube.com/watch?v=zRbGdGF6X1I

October 11, 2016 @ UHWO
https://www.youtube.com/watch?v=WsbeL8fR5yA

December 5, 2016 @ UHWO
https://www.youtube.com/watch?v=dvOAggnCfi4

December 7, 2016 @ UHWO
https://www.youtube.com/watch?v=3X_5MB5nEu8

December 8, 2016 @ UHWO
https://www.youtube.com/watch?v=yyvvyEEY4CyE

December 9, 2016 @ UHWO
https://www.youtube.com/watch?v=KkKphe2eNKc

December 12, 2016 @ UHWO
https://www.youtube.com/watch?v=VzWNryHMvW

Super Moon December 13, 2016 @ UHWO
https://www.youtube.com/watch?v=zVxBZ_ws_qQ
December 18, 2016 @ UHWO (Includes Pueo & Barn Owl)

https://www.youtube.com/watch?v=x4MRAY8VUig

Winter Solstice December 21, 2016

https://www.youtube.com/watch?v=22GycOiaJzw

Christmas Day December 25, 2016 @ UHWO

https://www.youtube.com/watch?v=QfrDx7DVejA

January 29, 2017 @ UHWO

https://www.youtube.com/watch?v=SVtziU4UiU

February 15, 2017 @ UHWO (Includes Pueo & Barn Owl)

https://www.youtube.com/watch?v=wyT3fCxhuWA

February 19, 2017 @ UHWO /HART TOD

https://www.youtube.com/watch?v=Uu9e2G4xttw

PUEO CAUGHT SLEEPING Close Ups MARCH 8. 2017

https://www.youtube.com/watch?v=GiHOev2uh7U

Pueo & Barn Owl 3.12.17 @ UHWO/Kaloi Stream West

https://www.youtube.com/edit?o=U&video_id=rK4AHYEvXxo

PUEO RETURNS & BARN OWLS ENGAGE 4.6.2017

https://www.youtube.com/watch?v=05OwiDNktD4
PUEO & BARN OWL SHARE HOME 4.10.2017

https://www.youtube.com/edit?o=U&video_id=t233RGXKN88

4.15.2017 PUEO @ UHWO

https://www.youtube.com/edit?o=U&video_id=w38mFsvQicY

4.17.2017 PUEO @ UHWO

https://www.youtube.com/edit?o=U&video_id=n8MXcYcQFL8

############################
From: John Bond
Sent: Thursday, May 11, 2017 12:50 PM
To: Hata, Tim K.; Sokugawa, Kathy K.; fkraintz@honolulu.gov; General Plan 2035; Michelle S. Matson; Choon James; Blake D. McElheny; Donna Wong; andrea anixt; Dr. Kioni Dudley; Natalie aka Bicycle Mom; Michael Lee; John Bond
Subject: Public Concern That OGP Testimony, Comments May Be Trashed By HHF

Public Concern That OGP Testimony, Comments May Be Trashed By HHF

TO: Tim Hata and HHF

HHF is contracted and paid by the City and DPP.

They should show ALL of the original documents on a website, like City and State bill testimony.

Nearly all EA's and EIS's when finals are released contain all original comment letters and testimony, especially when there is any Nexis with federal funds.

Most future funding for TOD will involve DOT funds, also HUD funds for housing, US DOE funds for Schools, Dept Energy, Dept Ag funds for electrification etc.

Everyone should know that their testimony is not just "considered" but actually be shown on a website and in response documents. Otherwise this is not a very democratic process for such sweeping changes to the Oahu General Plan.

Hopefully the City OGP 2035 is a democratic process the public can believe they had some real input into with evidence shown in documented comments and testimony.

John Bond
TO:  
Oahu General Plan comment deadline May 8th, Monday  
City and County of Honolulu, Department of Planning & Permitting  
650 So. King St., Honolulu, HI 96813  

HHF Planners  
ATTN: Oahu General Plan Update  
733 Bishop Street, Suite 2590  
Honolulu 96813  

Email: gp2035@hhf.com  
RE: Second Public Review Draft of the Oahu General Plan  

Dear HHF Planners  

The Oahu General Plan 2035, comments ending May 8, 2017 is currently proposing to make nearly all of Oahu a huge Transit Oriented Development, hotel, B&B, condo high-rise, rail or not rail, including bus stops. It’s all about developing every square inch and jacking up land prices all over Oahu. Rail is just the excuse that now requires everyone to be in a TOD.  

All over the world other cities are basing their TOD’s around Bus Rapid Transit, so there is no logical reasons to assume only Rail TOD can offer affordable housing.  

In fact, the entire multi-decade concepts of rail, rail ridership, TOD’s is being totally upended by the biggest tsunami and earthquake of our lifetimes- the self-driving electric vehicle, powered by solar energy. The vehicles are computers and cellphones on wheels and are the biggest transportation trend imaginable connected with the internet, artificial intelligence real time data allowing commuters to watch TV or sleep as the vehicles form up like schools of fish creating instant hot lanes and reacting to traffic situations miles away. This will transform EVERYTHING.  

Gov Ige Sold On Smart Electric Vehicles - Invited Google To Make Hawaii A Testing Base, Provide Jobs
The Governor Ige went to California to visit Google and is sold on Smart Electric Vehicles for Hawaii's future- as is everyone else with any brains to see where everything is headed by 2020. Tesla stock skyrocketing. Everyone worldwide in the vehicle manufacturing business is introducing Smart Electric Vehicles. It's now the 21st Century, not 19th Century.

Hawaii looks to take the lead in race toward driverless cars

http://khon2.com/2017/05/03/hawaii-looks-to-take-the-lead-in-race-toward-driverless-cars/

Google has never given a formal deadline, but has suggested it's working on having the technology ready by 2020.
Toyota is looking to have a driverless car ready to go by 2020.
Volvo is aiming to make its cars "death proof" by 2020.
Nissan and Honda are committed to have a commercially viable autonomous car on the roads by 2020.
Daimler, the maker of the Mercedes-Benz, is aiming to have its driverless trucks ready by 2020.
PSA Groupe, the second largest car manufacturer in Europe, is aiming to have fully driverless cars ready by 2020.

Clean Disruption - Why Energy & Transportation will be Transformed by 2030
https://www.youtube.com/watch?v=Kxryv2XrnqM

Section III, Natural Environment and Resource Stewardship (page 27): Threat of invasive species and the importance of biosecurity is absent here and is not found anywhere in the Revised OGP, despite recent and ongoing city issues concerning little fire ants and the coconut rhinoceros beetle. We recommend including a policy addressing invasive species prevention and/or biosecurity.

Section V, Transportation and Utilities: We recommend Objective B (page 34) be separated so that ensuring an adequate fresh water supply for residents and ensuring a sound system of waste disposal are appropriately addressed. These
two objectives, water supply and waste disposal, are two entirely separate needs. We are surprised that a safe and sustainable fresh water supply is not mentioned as an objective or policy under Section III, Natural Environment and Resource Stewardship, or under any other section for that matter. Water supply should not be under Transportation and Utilities.

Section V, Transportation and Utilities: We recommend Objective B, Policy 9 (page 35) be expanded to include proper and safe disposal of both hazardous and non-hazardous waste to address illegal dumping of construction and green waste.

Section VI, Energy: Objective A, Policy 3 (page 37) directs the city to “promote and assist efforts to establish adequate fossil fuel supply reserves,” We have concerns with this broad directive given what we’re learning from the DoD Red Hill site. We recommend Policy 3 be clarified or deleted.

Throughout the Revised OGP the term “multi-modal transportation system” is used and is not defined, e.g., Objective A under Transportation and Utilities is “To create a multi-modal transportation system . . .” (page 33), and Objective B, Policy 4 under Energy is “Promote further progress in the development of a multi-modal transportation system . . .” (page 38). The city should define for its taxpayers what a “multi-modal transportation system” is and how “transit-oriented development” fits into that.

Kanehili Cultural Hui objects to any proposed revisions in the Revised OGP that would allow transient vacation rentals (TVRs) in TODs or anywhere, permits any visitor accommodations in non-resort areas, or would utilize our unique natural environment, which should stay natural. The Revised OGP proposes revisions that would allow short-term vacation rentals in TODs, permits small-scale community-oriented visitor accommodations in non-resort areas, and calls for utilizing our unique natural environment by creating and promoting recreational venues for keiki and kupuna and for kamaaina and malahini (tourists/visitors). There are different terms used in Hawaii to identify short-term vacation rentals, including TVRs, transient vacation units, individual vacation units, and vacation rental units. This policy has the potential to turn our communities into transient accommodation living areas, and the term “small-scale” is not defined.
Furthermore, Objective D, Policy 13 under Culture and Recreation (page 51) states that the city should promote recreational venues for residents and visitors; however, time and time again it is clear that the city (and state) are unable to provide for safe and clean infrastructure to accommodate large visitor numbers, and the community pays the price.

Kanehili Cultural Hui has concern that the term “transit-oriented development” used in the Revised OGP is inconsistent with other Sustainable Communities Plans. Throughout the Revised OGP, there is a push for transit-oriented development (TOD), and our community “kiss-and-ride stations” or other transportation stations could be categorized as areas for TOD many years from now. If rail isn’t built, which is a real possibility, land developers may sue the Oahu tax payers because they assumed they would be located next to some rail station parking lot. It has to be clearly and legally stated that Rail is NOT A FACT.

Kanehili Cultural Hui has concern that there is clearly insufficient protection of endangered native Hawaiian species, such as the Pueo owl and other endangered Migratory Birds that are never found or identified in developer sponsored Environmental Assessments and Environmental Impact Statements, but are in fact there as many video and photos attest.

Kanehili Cultural Hui has concern that the Oahu General Plan is completely out of touch with current Sea Level Rise, tsunami and hurricane storm surge inundation science. It speaks of studying sea level rise in the future but doesn’t at all address what is happening according to the scientists at FEMA, NOAA, UH-SOEST and the City Tsunami inundation maps posted online in 2010. It’s written to allow the construction community to continue building as they please for self-enrichment, as example, encouraging development of HART rail stations and Transit Oriented Development in scientifically identified sea level rise flood inundation zones. This will cause massive loss of critical infrastructure, loss of lives and property and future lawsuits for deceiving foreign land developers into believing their investments are perpetually safe without loss of power, water, sewage and rail transit services.
A forward looking 2035 Oahu General Plan should be mapping sea level rise inundation zones around the island of oahu, limiting low rise buildings and forbidding high rise buildings in low-lying coastal areas subject to the variety of likely natural disasters long overdue. It should provide a plan to elevate coastal highways, airports, power plants, sewage treatment plants before disaster hits, and where ground water in the lowlands allows septic tanks to leach raw sewage into streams and public beach areas.

The West Oahu H-1 traffic problem needs honest, realistic mitigation with active consideration of a Pearl Harbor tunnel, causeway or floating bridge (like Washington State) and not a totally political boondoggle fiasco costing $500 million a mile for next to zero actual alleviation. Another extremely logical transportation plan with low cost and proven application is a trans Pearl Harbor ferry like Washington State which could move thousands of electric smart vehicles and buses directly from West Oahu to Joint Base Pearl Harbor – Hickam jobs in a matter of minutes. The fact that 70,000 more houses are in the pipeline for West Oahu shows how totally insane the Honolulu Department of Planning and Permitting really is.

**Major changes in Oahu General Plan – Jacked property prices, TOD urbanization Everywhere**

- Introduces and promotes use of **transit-oriented-development** (TOD) in several sections:
  - IV. HOUSING AND COMMUNITIES (policy 12 pg 36, policy 5 pg. 38);
  - V. TRANSPORTATION AND UTILITIES (policy 5 pg. 40, policy 6 pg. 50)
  - VII. PHYSICAL DEVELOPMENT AND URBAN DESIGN

- **Allows short-term vacation rentals** in TOD (transient-oriented-development everywhere) identified as areas near “transit station areas” (pg 50 VII. PHYSICAL DEVELOPMENT AND URBAN DESIGN new policy 6)

- Changes HOUSING AND COMMUNITIES section objectives and policies to include: **higher-density housing, smaller or zero parks, narrow streets, no parking for developer profits via transit-oriented-development schemes.**
• **Changes focus** of General Plan from metro Honolulu to allow developers to pave and concrete over all “future growth projected” of Oahu.

• **Deletes** reference to the General Plan being “dynamic” and that DPP will keep abreast of “emerging issues, changing community attitudes, needs and conditions, as well as new opportunities and planning approaches” and with the “emergence of any particular issue of City wide concern” DPP may “reassess pertinent objectives and policies of the plan.” – means anything.

ECONOMY

- A new policy also promotes a 21\textsuperscript{st} century economy that respects our traditional cultural values.
  - *No explanation of 21\textsuperscript{st} century economy – Cell phones? Marijuana farming? Whose “traditional” cultural values?*

NATURAL ENVIRONMENT AND RESOURCE STEWARDSHIP

- The objectives and policies recognize the importance of not only protecting the natural environment but the importance of stewardship to protect it for future generations. *Who is doing the stewardship? Private or Government?*

HOUSING AND COMMUNITIES

- This section recognizes the importance of developing whole communities that are well integrated with the surrounding land uses and natural environment.
  - *What does that mean?*
- The objectives and policies for housing ensure a wide range of housing opportunities and choices; to increase the availability of affordable housing; higher-density housing via mixed use and transit-oriented developments; to increase the use of sustainable building designs and techniques; to reduce speculation in land and housing; and address issues associated with homelessness so that all people have shelter. *It’s all about TOD and what developers want. DPP always gives them what they want if it’s “Rail TOD”.*
TRANSPORTATION

- The cost of building and maintaining the various elements of a comprehensive transportation system to service the island is a major public investment. *So why is the City spending $500 million a mile to maybe only benefit 2% public ridership? The best bus system in America is being destroyed?*

PHYSICAL DEVELOPMENT AND URBAN DESIGN

- New policies emphasize the need to recognize and prepare for the long-term impacts of climate change. *Why is the City Rail and DPP TOD actively encouraging land and infrastructure development in low sea level shore line areas identified by FEMA, NOAA, UH-SOEST scientists as tsunami, hurricane and sea level rise disaster areas?*
- Urban design emphasis is contained in objectives to create and maintain attractive, meaningful, and stimulating environments and to promote and enhance the social and physical character of Oahu’s older towns and neighborhoods. *Not happening in historic Ewa. The plantation buildings are being systematically destroyed. The historic Hawaiian railway is being constantly harassed by developers and State DOT who want to drive out their museum and train rides. The Ewa Battlefield lessee Hunt Corp refuses any historic preservation covenants. They want all destroyed for TOD.*
- Given the population distribution in the GP it is intended that rural centers be allowed to grow in an organic fashion, providing for generations to remain in their home towns and maintain the economic viability of our rural and suburban communities
  - *No definition for “organic fashion”*

HEALTH AND EDUCATION

- New policies support age-friendly cities, and call for Honolulu to become home to the wisdom of nations, befitting its status as an international Pacific crossroads, and for encouraging outdoor learning opportunities and venues that utilize our unique natural environment and native culture. *The recent World Congress of Blah Blah passed many resolutions but nothing used in City DPP Rail TOD planning. All ignored like TOD disaster zones.*
CULTURE AND RECREATION

- The city also recognizes the importance of providing adequate park space and facilities to keep up with changing demand. Does “Changing demand” mean flooding these parks and facilities with tourism operations? At one time tourism was Waikiki. Then it also became Ko Olina. Now under the new OGP2035 it means EVERYHERE because everywhere is a DPP TOD.
- New policies call for utilizing our unique natural environment in a responsible way to promote cultural events and activities, and for creating and promoting recreational venues for keiki and kupuna and for kama`aina and malahini (tourists/visitors).
  - No explanation of how recreational venues for the various groups are different from each other. New signs in parks suggest ownership.

POPULATION

Objective A To plan for future population growth in a manner that considers the limits of Oahu’s natural resources, that protects the environment and that minimizes social, cultural and economic disruptions.

Policy 3 – seek a balanced pace of physical development in harmony with the county’s environmental, social, cultural and economic goals by effecting and enforcing C&C regulations.

Policy 4 – Establish geographic growth boundaries to accommodate future population growth while at the same time protecting valuable ag lands and open space. The DR Horton Hoopili project shows what a big lie and farce that is. Nothing will ever justify that total ATTROCITY of destroying the best historic and proven farmland on Oahu. It’s a major reason to totally distrust the City DPP.

- Population densities in all areas remain consistent with the character and the culture and environmental qualities desired for each community. Not true statement because West Oahu wanted to keep land in agriculture but because the city put the Hoopili land into the growth boundary it was designated for development. North Shore doesn’t want Envision Laie, but all is pushed and approved by DPP crooks.
HOUSING AND COMMUNITIES

Policy 9 – Encourage the replacement of low- and moderate-income housing in areas which are be redeveloped at higher densities. \textit{This sounds very stupid.}

TRANSPORTATION AND UTILITIES

Objective A – To create a multi-modal transportation system which moves people and goods safely, efficiently and at a reasonable cost and minimizes fossil fuel consumption and greenhouse gas emissions; serves residents and visitors, including limited income, elderly and disabled populations; and is integrated with existing and planned development. \textit{City wasting $500 million a mile on rail fiasco.}

Policy 5 – Support the rail transit system as the transportation spine for the urban core, with links to the airport and cruise ship terminals, which will work together with transit oriented development to reduce automobile dependency and increase multi-modal travel. \textit{Everyone knows rail is a big land development con job wasting Billions. It requires a federal racketeering RICO investigation.}

VII. PHYSICAL DEVELOPMENT AND URBAN DESIGN

Objective D To develop a secondary urban center in Ewa and its nucleus in the Kapolei area. \textit{Why is the name “Ewa” being DELETED and everything called “East Kapolei.” NOTHING in DPP TOD City, RAIL is preserving “Ewa” – it’s a BIG LIE. It NEVER WAS “East Kapolei” and it is a Soviet-Nazi tactic to bulldoze cultures and names so that developers can give areas totally new FAKE NAMES like Hoopili.}

Policy 4 – Provide design guidelines special design standards and controls that will allow more compact development and intensive use of lands in the primary urban center and along the rapid transit corridor. \textit{Waipahu now looks like S**t! This is why the recent poll on rail was 78% AGAINST with the largest ethnic group Filipino AGAINST RAIL.}
Malaysia Has Electric Buses Running On Elevated Fixed Guideways

Malaysia Shows Honolulu Rail Guideways can be converted to Electric Bus Guideways

An Electric bus BRT system is far more versatile and part of the rapidly expanding 21st Century

Smart Electric Vehicle Era. Cities throughout the world are looking at electric buses as the best overall investment because they can be run anywhere, unlike fixed rail, and solar powered. HART Rail will require enormous electric power infrastructure and a massive power bill on top of annual Operations and Maintenance costs.

Malaysian elevated Bus Guideways also used for annual marathon event

https://www.youtube.com/watch?v=qq2zycGFH5o

The Malaysian Sunway BRT system has received a Bronze rating by BRT Standard score from Institute for Transportation and Development Policy (ITDP)
RAIL is 19th Century, Smart Electric Buses Are 21st Century

After 2020, all new bus purchases will be electric

Across the US West Coast region, the effort to electrify buses has hit the fast lane. Long Beach Transit shows off their new line of battery-electric buses which are lighter, quieter, and more eco-friendly.


In a recent interview, Long Beach Transit Chief Executive Kenneth McDonald said he wants to have an entirely clean fleet by 2020.

Tesla’s former finance director, Ryan Popple, 39, made it a personal crusade to revamp Proterra, focusing it on building electric buses. Sales more than doubled from 2015 to 2016, with expectations of revenues tripling in 2017, Popple said.

Popple predicts that by 2025, every transit agency in the United States and many in Europe and Asia will convert to all-electric buses. France, England, India and China are already doing so, with China at nearly 50 percent electric today.

“Our country has an uncertain future if we don’t transition well to this next technology,” Popple said. “If we don’t master this technology we will import this technology.”

The next month or so could determine the future of electric buses in Southern California. That’s because many of these companies are competing for a huge contract from the Los Angeles County Metropolitan Transportation Authority to buy electric buses.

King County Metro in Seattle released a report last week saying it can run a 100 percent electric bus fleet by 2034 for only minimal cost increases. With 1,400 buses on the roads — many of them electric trolley buses — it is the second-largest transit agency on the West Coast. The agency announced it will buy 120 battery-electric buses by 2020 with the first 72 from Proterra.
Gov Ige Sold On Smart Electric Vehicles - Invited Google To Make Hawaii A Testing Base, Provide Jobs

The Governor Ige went to California to visit Google and is sold on Smart Electric Vehicles for Hawaii's future- as is everyone else with any brains to see where everything is headed by 2020. Tesla stock skyrocketing. Everyone is introducing Smart Electric Vehicles. It's the 21st Century, not 19th Century.

Hawaii looks to take the lead in race toward driverless cars

http://khon2.com/2017/05/03/hawaii-looks-to-take-the-lead-in-race-toward-driverless-cars/

Clean Disruption - Why Energy & Transportation will be Obsolete by 2030

https://www.youtube.com/watch?v=Kxryv2Xm9mM

China, Europe drive shift to electric cars as U.S. lags

http://www.reuters.com/article/us-usa-autoshow-electrics-analysis-idUSKBN14Z0KW


Smart Electric Buses Are The Transit Future.
HART Rail will NOT be “Green” as claimed – it will be oil based power

One of the biggest issues the rail hasn’t come to grips with is the massive traction power requirements of heavy elevated rail running 24/7, 20 hours a week. It can’t be done using solar or wind power. Alternative “palm oil” substitutes are 30 times more expensive than regular oil which is at near rock bottom prices and falling because the entire transportation industry model is leaving oil behind. *HART Rail will require imported OIL.*

**Projected Rail Ridership Numbers Are Clearly FALSE**

Rail officials projected that rail fares would cover approximately a third of operating costs, but that’s extremely optimistic. They predicted 116,000 daily riders in 2030, which works out to about 5,800 riders per mile. That’s more than the number of riders per mile carried by the Chicago Transit Authority, Atlanta’s MARTA, or the San Francisco BART system—and considerably more than carried by heavy-rail lines in Baltimore, Cleveland, and Miami.
No TOD without Rail – False

Honolulu has one of the best used bus systems in the country, and the extremely high costs of the rail will lead to cannibalization of that bus system. The best thing Honolulu can do is stop spending money on the endless back hole rail project and go back to running an excellent bus system with Bus Rapid Transit Transit Oriented Development. (BRT-TOD)

Included in the Mayor’s testimony on SB1276: “Rail is the ‘Transit‘ in Transit-Oriented Development. There is no TOD without rail and we need TOD to provide workforce housing.” This is totally untrue as most cities in the world which build TOD’s around Bus Rapid Transit (BRT) or with at grade light rail trams. Any place with a bus stop or central bus transfer point is basically a Transit Oriented Development. Nothing prevents work force housing NOW without RAIL TOD and it could be done easily with BRT TOD’s using buses or trams. Actually Caldwell really wants TOD real estate deals to reward his campaign contributors and could really care less how long rail takes. Jacobs Engineering says in the PMOC that it will likely be 2026-27 if ever.

Poor Rushed Rail Construction Will Cost Huge Future Maintenance Fees

Bad, rushed rail construction pushed by the City to create a sense that “we can’t stop now” caused widespread poor contractor work on the WOFH (West Oahu) columns and railway supports. WOFH contractor Kiewit later agreed to replace the critical railway support “cost saving” plastic shims – with more plastic shims which substitute for reliable and durable concrete plinths. This means that in five years and before the railway actually goes into service the plastic shims will be going bad and will need to be replaced AGAIN. The use of plastic was a cost saving PR scheme at the time to sound good, but rail should have used concrete plinths for permanent durability. Just another big expensive O&M cost coming up later before rail even officially runs- in 2025-27?

There will someday be a major rail disaster because of using plastic shims to keep elevated rail cars from toppling over the guideway after a derailment. PLASTIC is no way to run a railroad that runs night and day. HART has already approved $265 million in change orders to Kiewit/Kobayashi for the first 10 miles of guideway so taxpayers are already paying for it with much more change orders to come based on low
ball bids. HART will have a future bad accident as a result and this will give Honolulu rail a badly constructed unreliable reputation.

**Rail Will Be Of No Use In A Major Emergency**

Rail won’t help when emergency services are needed. A bus way lane allows emergency vehicles like ambulances, fire trucks, and police to use it unimpeded during rush hour and provide lifesaving access that rail cannot and never will. In fact electrically powered rail is highly vulnerable to storm power loss and will be one of the very first transportation systems shut down during a major hurricane or tsunami. Once rail station access points are flooded and rail platforms are hit by high winds they will be evacuated and useless. Buses are far more flexible in natural emergencies and will continue to operate evacuating thousands of people mauka.

**Buses and cars will be far more preferable than rail, now and in the future**

*HART Rail is basically obsolete technology, circa 1890, while far more efficient, practical and convenient autonomous cars and buses are coming very soon, with rides arranged through smart phone apps. All the smart investment money is going there – Google, Apple, Ford, GM, Chrysler, Uber, Lyft, etc. Cities are switching to less expensive electric buses which can be charged for 150 miles using solar power. HART Rail will require continuous high demand electrical traction power supplies that will skyrocket in cost, especially in warmer weather.*

*Commuting on TheBus from Ewa Beach to downtown can typically take 50 minutes NOW. Taking a bus to a rail station and then a bus again and repeating that twice a day will be more expensive, exhausting and time consuming. This is why the vast majority of commuters on Oahu, who don’t live like people in New York, will look to any and all other transit systems that don’t require this insanity. Destroying the best bus system in America and forcing bus riders onto trains will only make everyone angry at how really stupid and fraudulent the whole rail concept is (Rail isn’t even ready and everyone is already coming to that conclusion.)*

Rail requires too many bus-rail transfers for acceptable travel times—currently local City bus service is faster and better that rail will ever be. Low income riders pay much more each way in lost time at home as well as through the regressive taxation stealing every dime they make to survive.
HART Rail is a cruel social injustice and making it forever is totally mean and vicious. That’s because Operations and Maintenance IS FOREVER.

Also huge FOREVER electric bills while Smart Electric vehicles will be running on solar power.

Rail will take nearly 10-15 years to become operational because of many, many bad planning, funding and design issues. The public was lied to. The existing financial “plan” is a disaster, getting worse with future higher O&M costs. The new rail cars are already found to be defective and need replacement while the cracking guideway is also badly defective, a dangerous accident waiting to happen with plastic shims needing replacement in just 5 to 10 years.

Meanwhile Honolulu Oahu has potholed roads which are not being repaired, water mains and sewer lines that break almost daily flooding streets and beaches with mud and sewage, badly maintained park facilities and a constantly failing City zoo. The City has a very bad Operations and Maintenance record. No one believes rail will be any different or any better.

**21st Technology Rapidly Passing 19th Century HART Rail Scheme**

Rail will cost more in environmental impacts that will cars on H-1. The fossil and non-renewable fuels to generate rail electric power is far more polluting because it will require non-renewable oil and gas. Solar power can be stored and charge electric cars and buses overnight to run 150 miles all day while rail cannot use solar power because of the huge amount of constant traction power required on the massive night and day operations needed by rail cars, energized guideway, platforms and support facilities that are NOT REQUIRED by electrically powered cars and buses running on roadways.

**Rail Job Creation - Another Con Job**

The public was promised “thousands” of rail jobs- “Each year during construction, the rail transit project will help generate an average of 10,000 jobs. “ (In fact, that’s still listed on HART’s website, [http://honolulutransit.org/inform/rail-facts?tag=Jobs](http://honolulutransit.org/inform/rail-facts?tag=Jobs).) As of June 2016, there were less than 2,000 direct local jobs. What actually happens is rail work crews, many hired from the mainland, just move along to the next construction segment. The “10,000” is actually just the same smaller work
force. The City and HART are just lying as usual. Councilmember Kobayashi says the train hasn't delivered what was promised in terms of jobs. "First it was 17,000 jobs, then 10,000 and here we are at 1,300," said Councilmember Kobayashi.

**Rail Proponents and HART website make false claims**

It is claimed that rail lawsuits were the major reason why the HART project ran billions over budget. The truth is delay costs from litigation added up to approximately $78 million, according to HART officials. The bill for outside attorneys raised that by an additional $3 million, meaning the city and HART have incurred at least $81 million in costs related to litigation. The reason for litigation included the Hawaii Supreme Court finding in August 2012 that the city and state didn't follow the law when it began building rail columns in West Oahu. The rail rush job mentality, rather than doing the rail project right, was caught by the law requiring identification and protection of Native Hawaiian burials along the rail line. Why was it not done previously?

The Federal lawsuit to stop rail gave the plaintiffs access to FTA’s internal email, which revealed intra-FTA concerns about the city’s “lousy practices of public manipulation,” Use of “inaccurate statements,” Culture of “never [having] enough time to do it right, but lots of time to do it over,” and an observation that the city had put itself in a “pickle” by setting unrealistic start dates for construction. Absolutely the way it was all done by City politicians who are arrogant.

**False - Tourists Pay For Rail Caldwell and HART Website Claims**

". . . funding the project with the general excise tax, which is effectively a sales tax, because roughly one-third of it comes from tourists." Caldwell. This is absolutely NOT TRUE and the true figure is less than 20%. The property tax on hotels and visitor tax could be raised so that tourists actually pay a one-third share of the rail cost. But THAT will never happen. Instead right now the local Oahu public through regressive taxation is paying at least 80% of the rail cost. This is documented fact from auditors.
Aloha Stadium should be the Oahu multi-modal Transit Oriented Development site where there are major highways, gathering places, military DoD, Historic sites, Ferry landing and nearby airport. This makes the most sense.

An Aloha Stadium multi-modal transit site is much more disaster resistant to floods, tsunamis, sea level rise. It has the best connections to all major highways on Oahu. A Washington State type Pearl Harbor Ferry could transport buses and vans from Lima Pier, West Loch across Pearl Harbor to ferry landings at Joint Base Pearl Harbor. (Plan details explain the traffic flow advantages.)

Not only would large numbers of JBP HH workers get to their jobs in 5-10 ten stress free minutes, it would work for Tripler, Fort Shafter and Camp Smith commuters. Traffic flow on H-1 would increase tremendously
and at a fraction of the now likely cost of rail at $5-700 Million a mile, or around $12-16 Billion and take 10-15 years.

Just imagine "Aloha Transit Center" - there would be a lot of supportive press for that as well as State ledge support and the Gov would support it. Middle Street is a boring place to get away from while a Aloha Transit Center would be a destination that used day and night and weekends. It could attract a lot of private development interest.

Aloha Stadium makes the most sense as the freeway and highway options are far better from there than Middle Street. The BRT bus ramps would work better there and allow far better connectivity with tour buses, cabs (uber, etc.) and Joint Base PH buses.

Middle Street will mean putting buses directly into the one of the worst H-1 merge points. Aloha Stadium would provide two freeway options as well as Pearl Harbor routes and H-2 Kailua-Kaneohe routes - all from one location. Pearl Harbor is a major job center and also a major tourism destination for tour buses. Aloha Transit Center would be the ideal TOD.

Aloha stadium has tons of parking and converting it as a transit center and TOD would far more practical with minimal traffic disruption. The old
The stadium is going away and it could become a new mixed sports complex and outdoor concert venue. The State would willingly support that and highway funds could be better used complete all the hookups.

Aloha Stadium is also at a higher elevation and less likely for tsunami, storm surge and near term SLR. The site will have an attractive future while Middle Street is a boring mid end industrial area.

The first 10 miles of rail guideway ends at Aloha Stadium. The practical and best option is to convert the rail guide way to a 2-lane HOV(2) Reversible Smart Electric vehicle - Busway from Kapolei to Aloha Stadium for less than $4 Billion already collected via GET. Express electric buses can CONTINUE on to downtown, Waikiki, or UH and beyond using the H-1 Freeway/airport viaduct/Nimitz HOV lanes. The two-lane reversible can be used for single passenger vehicles during non-peak hours.

The year 2030 downtown-bound commuter demand will be 15,000 commuters per hour ABOVE the existing highway capacity, according to the city’s Alternative Traffic Analysis. The reversible can carry up to 17,000 commuters per hour (200 smart electric express buses and 3800 smart electric vehicles per hour) versus 3,000 RAIL commuters per hour. The REVERSIBLE expressway will eliminate traffic gridlock at the H-1/H-2 merge. New buses are 80% federally funded and would cost the city about $200,000 per bus or $40 million for 200 new buses.
Ewa-Kapolei Commuter Traffic Alternative – Pearl Harbor Channel
Smart Electric Vehicle- Smart Electric Express Bus Ferry

Whether rail guideway converts to electric busway or not, this plan is reasonable to implement and can take hundreds of cars off of H-1 in Phase One

The Forgotten 60+ Years of successful Pearl Harbor Vehicle Ferry Operations

For over 60 years Oahu had a very successful ferry service that brought vehicles across Pearl harbor and the Pearl Harbor channel to the Ewa side- and back. At least five known YFB vehicle ferries were in operation during that period, transporting tens of thousands vehicles and people to Ford Island and West Loch, connecting MCAS Ewa and NAS Barbers Point to Hickam and Pearl Harbor in just a matter of minutes, and apparently with an outstanding safety record.

Today the issue of H-1 traffic congestion cries out for some logical remedies. Whether rail construction is ever completed, the fact is it won’t take more than 1-2% of any vehicles off H-1 and if ever running won’t be until well after 2026 or much later.

The logical near term and relatively low cost answer is a Pearl Harbor vehicle ferry.

For those who say ferry service was “tried and didn’t work” don’t understand that the WRONG IDEAS were tried - which explains WHY- they didn’t work like “The Boat” which was doomed and likely planned to be a failure as part of the Rail Mafia agenda.

The successful Navy YFB ferry system never went into the open ocean; it operated in the calm waters of Pearl Harbor. The ride was brief, safe and convenient for 60+ years.

For those who say that a ferry service is something the Navy will “not allow” today is simply based upon a pre-determined political bias that really only wants to see one monolithic, hugely expensive system as the “only solution” to Ewa’s commuter traffic problems. Joint Base Pearl Harbor – Hickam (JBPHH) has a very large military and DoD civilian work force, many of whom live in West Oahu. An issue of quality of life and better workforce productivity is certainly an item they will seriously consider, especially if it has few if any downsides.
A return to a successful and relatively inexpensive cross channel Pearl Harbor vehicle ferry system could be implemented in operational phases which would confirm how really viable, practical, safe and popular this commuting system could be. This plan uses a route shown further below with maps and other information detailed.

**Phase One**

Military and DoD workers using Smart Electric Vehicle VanPools leave their homes and drive through the Navy West Loch gate to Lima Pier to board the barge/ferry. Private cars are not allowed— the idea is to encourage pooled electric transit vehicles which can take four to six private cars off of H-1 every morning and afternoon. The payoff for these participants is leaving their home and arriving at work in under 30 minutes. This also simplifies ferry loading procedures with VanPool drivers knowing what to do. 150 pooled commuter vans can equal around 750 to 900 single car drivers.

*Keep in mind too that because of this “short cut,” workers at Fort Shafter, Camp Smith and Tripler would also likely go this way too rather than drive around Pearl Harbor.*

There are other benefits as well— such as leaving a base registered POV parked on base for weekday errands, while using the Van Pool just for job commuting.

**Phase Two**

**Non-DoD Civilian commuters are included using Electric Express Ferry Buses**

Express Ferry Bus riders are collected at regular Ewa-Kapolei bus stops and the buses drive through the Navy West Loch gate to Lima Pier to board the barge/ferry. Again, private civilian cars not allowed. This simplifies security because JBPHH has strict POV car registration requirements that require stickers, etc.

City Buses will NOT stop anywhere on the base, they simply pass out through the two main base gates and continue on H-1 or Nimitz Highway to downtown and Waikiki stops. Four stretch Electric Express Buses @ 60 passengers each = 240 people Four articulated Electric Express Buses @ 90 passengers each = 360 people
Initial surface transport could be achieved by using large barges moved by Navy contracted tugboats carrying groups of vans and buses across, all under the Pearl Harbor Port Operations control system, which even today allows individual commuter kayaks to cross the Pearl Harbor channel to JBPHH jobs. Navy ships still always have the right-of-way.

This alternative commuter traffic solution would benefit both the large number military and DoD workers who live in the Ewa-Kapolei area, making their morning commutes as short as 15 minutes from their home to their desk, but also significantly reduce the commute time for downtown and Waikiki workers.

These would all be cars, vans and buses that would be completely REMOVED from the H-1 traffic flow every day and the effect would be seen by all the other civilian H-1 commuters each morning and afternoon creating the “Federal Holiday” effect on traffic conditions. If concepts such as tele-commuting and locating more jobs in Kapolei were instituted, there would be an even more noticeable H-1 traffic effect.

The Phase Two solution utilizing City Express buses could be combined with a true vehicle ferry system such as Washington State operates, allowing fast, highly efficient Pearl Harbor channel crossings between Ewa West Loch and JBPHH. Washington State is building locally new 64 and 144 vehicle ferries that are fuel efficient with a great safety record. Ferries built for Pearl Harbor use would not need heating, snackbars or have to be concerned about extreme tidal fluctuations or strong tidal currents.

The use of the City Electric Express buses on this alternative cross Pearl Harbor channel route would also free up H-1 Express Lanes around Pearl Harbor and allow their use for cars carrying just two commuters (three currently required) and for a more advanced Managed Lanes program where single passenger cars would electronically pay tolls to use the Express lanes.

The end result of this concept is that many cars, vans and buses are taken off H-1 at some critical congestion points – the H-1 Pearl Harbor section, and also at Nimitz and Hickam front gates, where incoming morning military-DoD traffic always piles up. The
Pearl Harbor ferry system would do a lot to help rebalance traffic flows and be a far more intelligent use of roadway space than the relatively unimaginative systems being used currently.

The "Moko Holo Hele" (YFB-87) previously moored at Kalaeloa Boat Harbor.

40 ft. HybridBus, 60 ft. articulated HybridBus
Ford Island used to have regular ferry service going back before WW-II

Map shows approach roads from Ewa Beach to the West Loch Navy Gate and road that leads to Lima Pier

Yellow Dots shows route from Lima Pier to either a landing at Hickam or a landing a South Avenue—which leads directly to Nimitz Gate and the H-1 Freeway.
City Bus Map shows that TheBus already transits through Hickam and Pearl Harbor—so buses are not a security risk.

1952 Air Photo shows some of the still remaining wartime construction of nearly continuous piers and docks along the Pearl Harbor channel which allowed numerous crossing points.

MCAS Ewa and NAS Barbers Point—on the Ewa side of the Pearl Harbor channel
Twin Sister of Pearl Harbor Moko Holo Hele is the Washington State Ferry Hiyu

Oahu’s Pearl Harbor vehicle ferry idle while Washington State still uses theirs!

Washington State Ferry Hiyu (sister to Pearl Harbor’s Moko Holo Hele)

Washington State conducting major ferry construction projects for 64 and 144 car ferries.
Todd worked with its subcontractors Everett Shipyard, Nichols Brothers Boat Builders and Jesse Engineering to meet an aggressive 18-month timeline to build this first vessel in the class of Kwa-di Tabil (64-car) Ferries.

The new 144-car vessel design will be based on the Issaquah class, which has proved the most versatile vessel in our fleet and has the most utility throughout the system. The Legislature originally approved funding for the 144-car ferries in 2003. We have spent $62.1 million on the 144-car ferries program through Dec. 31, 2009 ($14.3 million for initial design, $47.8 million for equipment). This expenditure maintains project momentum and continuity in the design.

Washington State Ferries are NEW and AMERICAN BUILT!

WSDOT Ferries Division (WSF) will build three or four new 64-car ferries in the next several years. Building new vessels will improve the safety and efficiency of WSF’s fleet, to ensure safe, reliable service to customers. (Hawaii a clueless ocean State.)

One of the big advantages Oahu would have running its own ferries is that there is minimal tidal variance and ferries will not have to be heated for wintertime conditions. In
fact, people will likely not even step outside of their vehicles, especially if only special City buses or Van Pool vehicles are used. The ride would be very short, 5-10 minutes.

Ferry landing in Washington State – Oahu doesn’t have the winter weather or tidal fluctuations that Puget Sound ferries have to deal with.

Pearl Harbor Port Operations

Pearl Harbor, Port Operations Organization coordinates, schedules and provides assigned waterfront services to all home ported and visiting ships and vessels at the Pearl Harbor Naval Complex, including the Pearl Harbor Naval Shipyard, Naval Undersea Warfare Center, Deperming and West Loch. These waterfront services include berthing assignments, magnetic silencing, pier services and logistical support. Port Operations schedules ship movements and provides tug services as required.

Pearl Harbor Port Operations Services Include:

Providing water taxi services within Pearl Harbor for over 50,000 military, dependents, and DOD contractors annually, and provide scheduled tour boat services to/from the USS Arizona Memorial for 2 million visitors annually.

Provide continuous Port Operations Signal Tower communications to all vessels entering and departing Pearl Harbor and provide pilot and tug service; overall berth set-up; Dockmaster services; line handler services; and cargo services.
Disseminate severe weather information, control harbor voice nets; prepare and
distribute waterfront management reports and prepare ship sortie and return plans for
emergencies when directed by higher authority. Provide a qualified Facility Response
Team for ensuring the integration of safety, health and environmental/pollution
protection programs.

March 26, 2008 “UH professor offers alternatives to rail system”
By Dan Nakaso, Honolulu Advertiser

A new study concludes that a system of high-occupancy toll lanes, bus rapid transit,
highway underpasses and a Pearl Harbor car ferry would cost a third of the price of a
starter rail system while moving people and traffic quicker and more efficiently.

The study, released yesterday by Panos Prevedouros, a University of Hawai‘i
transportation engineering professor and 16 of his graduate and undergraduate
students, claims to be the state’s largest-ever simulation study of five alternatives to
relieve traffic congestion.

The study also found:

A Pearl Harbor car ferry system could barge up to 500 vehicles per hour across the
mouth of Pearl Harbor, connecting drivers to Lagoon Drive near the airport.

Following the Pearl Harbor briefing, Mayor Mufi Hannemann blasted Prevedouros
and the subjects of his study.

FERRY BOAT DISCRETIONARY (FBD) PROGRAM (2011)

The Ferry Boat Discretionary (FBD) Program, which provides a special funding category
for the construction of ferry boats and ferry terminal facilities, was offered in 2009 as
part of the American Recovery and Reinvestment Act of 2009, by the Federal Highway
Administration (FHWA).

$60,000,000 was provided for capital expenditures for ferry boats and ferry terminal
facilities. The Federal share of the costs under this program was up to 100 percent at
the option of the recipient.

Because of powerful Pro-rail politicians:
The City and State of Hawaii turned down the opportunity to participate.
Washington State has extensive vehicle ferry experience and expertise that Hawaii could learn from. Inland water ferries are the best model for crossing Pearl Harbor.

They’re cheap. They are diesel-electric craft, and the fuel and maintenance they would required is less than comparable modes of transportation, and they’re relatively environmentally friendly.

They’re big. The YSBs are designed to haul all sorts of large vehicles, which means they can haul several dozen, maybe hundreds, of people at a time, and the passengers would be free to roam the ship. The Pearl Harbor YSBs even have upper decks where

They’re convenient. The ferry landings at both ends happen to be exactly where visitors need to go. If the ferries are used only for pedestrians, then the big, ugly, noisy vehicle ramps at the landings can be rebuilt as pleasant piers -- you step onto the craft instead of climbing over the ramp. They’re suited for use by the disabled as well, unlike buses or boats.

They’re efficient. A visitor’s time is so carefully managed by tour agencies that it makes sense to combine the transportation, interpretation and orientation aspects of visiting Pearl Harbor into a single experience.

Ford Island Ferry Landing – is still there.
The Age Of Electric Smart Self-Driving Vehicles Coming NOW

Now the Oahu General Plan MUST ADDRESS A DISRUPTION REVOLUTION!

Now is the time of one the biggest coming trends in our lifetimes that will completely change public transit, energy, Transit Oriented Development and highway traffic patterns and all OUTDATED RAIL and TOD projections. Nothing previously will change the Oahu General Plan than what is coming to Honolulu and Hawaii by 2020 and in full force by 2035!

Everyone needs to watch this extremely important international presentation by a world leading forecaster of a major Energy and Transportation “virtual tsunami” that will hit Hawaii by 2020. It’s 53 minutes. It will CHANGE EVERYTHING about the premise of the Oahu General Plan, HART Rail and TOD plans are based upon.

Clean Disruption - Why Energy & Transportation will be Transformed by 2030
https://www.youtube.com/watch?v=Kxryv2XrnqM

Tony Seba's Clean Disruption Keynote presentation at the Swedbank Nordic Energy Summit in Oslo, Norway, March 17th, 2016.

The keynote, based on the book 'Clean Disruption of Energy and Transportation' shows that four technology categories will disrupt energy and transportation in Hawaii and worldwide:

1- Batteries / Energy Storage
2- Electric Vehicles
3- Self-Driving Vehicles
4- Solar Energy

The outcome of the Clean Disruption is that by 2030
• All new vehicles will be electric.
• All new vehicles will be autonomous (self-driving).
  • Oil will be obsolete
  • Coal, natural gas and nuclear will be obsolete
• 80+ per cent of parking spaces will be obsolete.
• Individual car ownership will be obsolete.
• All new energy will be provided by solar (and wind)

Clean Disruption is a technology disruption. Just like digital cameras disrupted film and the web disrupted publishing, Clean Disruption is inevitable and it will be swift.

Goldman Sachs has projected the market for advanced driver assistance systems and autonomous vehicles will grow from about $3 billion in 2015 to $96 billion in 2025 and $290 billion in 2035. Intel just recently paid $15 billion to purchase Mobileye, a world leader in vehicle collision avoidance technology.

The rapidly growing self-driving vehicle industry covers everything from road testing to software development, electronics, styling design, automotive servicing, mechanics, and offers major entrepreneurial business and job creation opportunities. And like it or not, this is THE major coming transit phenomenon.

Driverless Vehicles will revolutionize all concepts of Public Transit and Transit Oriented Development. Less than 3 years away, will change everything about how people will go to places in Hawaii. In 5 years this will be as ubiquitous as cell phones today.

Self-driving cars will be the "private industry capital" needed for public transit innovation that is favored by the current DOT administration and was already receiving big support from the previous DOT administration. A lot of the smart capital investment money is going into it.

This could even be considered as an FTA Recovery Alternative for HART Rail that the new DOT Secretary could support as another option to consider. Hart Rail is still many years away (likely 2026-29, maybe) from ever being a revenue generating system and by the time it is operational in ANY FORM the Smart self-driving vehicle industry will be the choice ride for nearly everyone. HART has never factored the effect of this major new technology in their ridership projections.

Honolulu HART Rail ridership estimates and TOD concepts need to be completely revised to be relevant.
Driverless vehicles will be the best answer for revenue generation for State highway improvements, can create virtual hot lanes, capacity increasing vehicle convoys, make automatic electronic toll payments, move far more people in comfort with much better traffic flow and with much fewer highway accidents.

While other states have permitted testing, California has just taken a major step forward for the self-driving vehicle industry. Given California's size as the most populous state, its clout as the nation's biggest car market and longtime role as a cultural trendsetter this will most certainly will affect Hawaii in the near future. The State Legislature should examine the process California underwent to move self-driving vehicles forward.

Most major self-driving vehicle developers see 2020 as the new decade year when the combination of many technologies become mainstream with widespread deployment and public acceptance. Smart phone applications, social media and popular movie, TV and internet media fueled by major advertising budgets will all help drive it forward very quickly as the technology is rolled out everywhere. Hawaii doesn’t have to be the last place this happens.

The Governor has acted immediately to bring the major self-driving vehicle developers like Google and Apple over to Hawaii to brief the University and State legislature on the many possible job opportunities and benefits. Smart vehicle testing and product development in Hawaii would be a real high tech boom, with grants and jobs for college students and researchers.

The internet is just 21 years old and has largely transformed American society in almost every way. Smart phones have become a world-wide ubiquitous "must
have" commodity in only 5 years, containing digital cameras, GPS, useful apps, vast storage and huge computer processing capacity as part of Cloud networks.

Driverless vehicles are tapping directly into this already built and growing phenomena of many technologies, including fashion trends, in ways that most people have not yet imagined what the revolutionary implications are for public transit.

**Driverless Vehicles Will Be Economically Successful With Many Advantages**

*Driverless vehicles can form virtual On Demand Hot Lane Toll Lanes and transmit fees electronically. No toll booths needed.*

*Operating cost of 6-10 passenger self-driving VanPool vehicles will be very competitive and can safely tailgate at 60 MPH like virtual railway train cars but with much greater capacity and comfort.*

*Driverless Vehicles will provide transportation services all day and all night, without needing to park on the street or in a garage. Insurance rates will be the lowest for driverless vehicles because they will have the lowest accident rates.*

*Quieter electric self-driving vehicles can be charged using solar voltaic panels and will not require the enormous electric bill, traction power and power plant stations required by the current HART rail. This new public transit industry will be self-funded by private enterprise.*

Hawaii's government Social Services would likely make it affordable for low income by providing electronic ride share cards subsiding trips for students, elderly, handicapped, medical appointments and as an unemployed benefit.
Driverless Vehicles will report in for periodic servicing automatically at the most optimal coordinated times, significantly lowering operations cost. Their safety checks and registrations will always be current. Tolls and fees paid automatically.

Driverless Vehicles will help eliminate the need to own a second or multiple family cars. Traditional family cars will likely remain for a decade in garages as the public accepts the reliability and lower cost features of driverless on demand transit services for daily job commuting.

There will be a wide range of specialized driverless vehicle services created or enhanced including overnight package delivery, emergency medical response, food market deliveries, etc. People not requiring driver licenses or car insurance can accompany driverless vehicles for personalized service at the destination.

The introduction of self-driving cars will lessen consumer opposition to paying more to use roads during peak periods. Ride-hailing apps have taught consumers to accept surge pricing, and people are generally less resistant to paying for something new if it is comfortable and convenient. It’s like ordering a pizza. H-1 congestion pricing, toll fees, virtual hot lanes will be built in to self-driving transit.

Commuters will get to work and get home much earlier than the bus, rail, station, bus re-boarding mess created by HART rail. Much greater inconvenience, much longer daily commute times, mostly standing up in HART rail subway style "cattle cars" sometimes with very undesirable, strange, smelly people, professional thief opportunities, railway and station accidents delaying trains will make HART rail
very unpopular. TV, movies and social media will promote the great comfort of self-driving options over the hugely more expensive rail fiasco.

On H-1 there will still likely be traffic jams and accidents but smart car riders will get to eat, sleep, read, watch videos, etc., in an air-conditioned vehicle with a comfortable personal seat with a few commuter friends. Private industry Smart Car/Van operators will offer electronic coupons, and many incentives to attract riders, including a cost breakdown showing how their service is still cheaper and more convenient than the combined costs of operating a vehicle every day for commuting.

Larger Hawaii corporations will likely offer self-driving vehicle services to their employees as a very popular employment benefit. Daily home to office commutes will be extremely popular and a time to sleep, read or talk with coworkers.

Hawaii military DoD will likely contract self-driving vehicle services for active duty military and base workers. This will become a booming private industry with or without a DoD subsidy.

Those private industry Smart Car/Van operators will find the right mix of customers just as clothing stores and restaurants determine exactly the style and tastes their customers want and are willing to pay for. This is why the private industry "On Demand Transit" model will be superior in every way - including safety checked vehicles with low insurance rates automatically paying highway toll fees and taxes to the State.
TV’s Knight Rider’s concepts of AI and autonomous vehicles were science-fiction in the 1980s and are now a science fact. Popular internet, social media, movies, TV will drive the self-driving vehicle phenomena forward backed by ad budgets.

http://www.businessinsider.com/companies-making-driverless-cars-by-2020-2016-10

https://waymo.com/


The Oahu General Plan and the HART Rail TOD Plan

The most important issue among many is the City sponsored HART rail project which will have many negative effects on the population and cultural society the majority of residents cherish and want preserved and protected. The failure of the HART Rail project to be financially unsustainable and a vastly over budget fiasco of national historic proportions is because it was never intended to be a commuter rail system but instead serve as a marketing tool and attraction for Transit Oriented Development.

These comments contain a list of counts against the City HART Rail and Transit Oriented Development to urbanize all of Oahu well beyond natural island sustainability into a Hong Kong future of vast overpopulation, crowded parks, beaches, high property taxes and fees intended to drive out local residents and the indigenous native Hawaiian community.
THE NUMEROUS SERIOUS COUNTS LISTED THAT REQUIRE STATE AND FEDERAL AGENCY INVESTIGATIONS

Listed Counts Involve – A long and established pattern of City Misrepresentation, Malfeasance, Lack of Fiduciary Responsibility, Coercion, Propaganda, Bribery, Graft, Conspiracy to Defraud, Breach of Contract, Racketeering, Perjury and Pecuniary Gain for the benefit of rail project Transit Oriented Development insiders cooperating in techniques and activity associated with organized white collar criminal syndicates identified under OCCA-RICO laws.

The FBI’s website puts it bluntly: "Lying, cheating, and stealing. That’s white-collar crime in a nutshell." White collar crimes are summarized as financial crimes designed for pecuniary gain, with high dollar amounts, using techniques of racketeering, fraud, and misrepresentation including offenses such as Public Corruption and Bribery.

The Organized Crime Control Act or OCCA, RICO is a federal law that prosecutes perpetrators of white collar crimes where defendants commit at least two acts of identified racketeering activity. RICO law is directed at recognized racketeering activity, inherently wrongful and immoral behavior by elected or appointed public officials.

COUNT 1 – Breach of FTA FFGA Contract– The City and HART breached the Full Funding Grant Agreement Contact in 2014.

Yet this was not fully evident until later when it was revealed that the Federal Transit Administration was withholding grant payments due to the City’s lack of providing due diligence and accountability of rail funds.


The Hawaii State Legislature passed a bill (Act 247) in 2005 that set .05% GET on Oahu only to use only for the construction of a mass transit system due to expire on December 31, 2022.

The FFGA agreement was to provide Federal funding ($255M first increment) and future Federal New Starts (Section 5309) Funds, Maximum $1.5 Billion, with City’s financial commitment of $3.4 Billion.
The FFGA is a contract, promise and agreement made with specific financial terms and revenue date of transit operation which because of extremely bad mismanagement and financial accountability has not been met. This also is a breach of the TRUST between the public and the city that they would have commuter rail service within a certain time period. In addition, the rail tax was set to expire on December 31, 2022 because this was the amount of funding Hawaii State legislature agreed to and the amount the tax paying public was told would be the cost.

(EXAMPLE: If a contractor agrees to build a house for $500,000 within 6 months but later wants 4 times that amount and 6 years to complete the house, all reasonable people would agree this is an egregious outrage and breach of contract agreement. But not by City rail racketeers.)

The City defaulted on the FFGA agreement for two years unable to provide requested project expenditures while keeping this largely confidential from the public. Pursuant to the FTA Project and Construction Management Guidelines 2016, Section 2.3.5, this resulted in pleas by the City to the FTA for more time and eventually FTA requiring a “Recovery Plan” showing how the project would be conducted with the means of a budget, rather than totally out of control spending and a complete lack of accountability for two years.

In 2015 when rail began to have financial issues Council Chair Martin said ending the rail line at UH Manoa could be done if the city chose a new route and bypassed Kakaako and Ala Moana Center. “I’m sure they’ve done some of those preliminary studies already,” he said. “I would think the ridership would be more attractive going to UH-Manoa than it would be going to Ala Moana Center.” Martin also said the FTA may not require the city to reimburse it the $457 million in federal dollars already spent “because the work has already been done.”

The Billions MORE for Rail Has Become Personal Caldwell Agenda For His Political Rail Mafia

COUNT 2 – Continuous Misrepresentation, Malfeasance, Gross Misjudgment, and Lack of Fiduciary Responsibility

At this point at the beginning of early construction was a very serious sign of project Misrepresentation, Malfeasance, Lack of Fiduciary Responsibility and Gross Misjudgment that should have required an immediate and complete reassessment of all construction costs and financial budget. Instead attempts were made to hide this from the public which also had FTA asking questions about possible City misuse of TheBus funds for the rail project.

The city released the Draft Environmental Impact Statement (DEIS) only two days before the 2008 general election containing information that would have very likely changed the election outcome. The city deliberately withheld key information to early voters who had already cast their ballots for the mayoral candidates, and the city charter amendment related to the project.
AUDIT DESCRIBES FINANCIAL TRAIN WRECK

“HART’s financial and operating plans are not reliable or current.” “HART does not have an adequate contingency reserve.” HART could not provide documents to back up $120 million in utility costs and $45 million in project enhancements. A report by the Office of the City Auditor concluded. Honolulu Star-Advertiser, 16 Apr 2016, By Marcel Honore.

Concerned only about his political future and the demands of his Rail Mafia supporters sent a statement that said: “My focus is on building this transformational project as quickly and inexpensively as possible.” For Caldwell “inexpensive means NO PRICE OR COST TOO HIGH.

Auditors said they didn’t find documentation to support $45 million in project enhancements, including public highway improvements, backup generators and fare collection. And was maintaining vacant office space and repackaging station construction contracts without properly evaluating whether the move would actually save costs. Budget Chairwoman Ann Kobayashi, have expressed for years, saying they’ve been unable to get clear, accurate figures from HART.

Count 3- Civil Rights violations of Weakest, Lowest Income citizens by Repressive, Regressive Taxation, Fees and Charges

Repression of Oahu citizens of low income, disadvantaged, elderly, retired, disabled, students under the onslaught of massively growing Repressive, Regressive Taxation, Fees and Charges to benefit Caldwell’s political future, paid off politicians, Rail Mafia beneficiaries and propagandists.

These civil repressions will invite many future civil rights lawsuits for unfair and unjust repressive, regressive taxation and extreme cost of living hardships for retired, elderly, low income workers, students and handicapped. The grossly over budget rail project benefits Caldwell’s personal political agenda and big rail contractors, land developers, unions with extremely high incomes while the low income citizens will SUFFER paying for decades.

https://wallethub.com/edu/states-with-highest-lowest-tax-burden/20494/#methodology

Hawaii

- Rank: 2nd Highest
- Total Tax Burden: 11.27%
- Property Tax Burden: 2.11%
- Individual Income Tax Burden: 2.64%
- Total Sales and Excise Tax Burden: 6.52% – #1 in USA
Count 4 – Breach of Public Trust Contract
Skyrocketing Rail Cost, Highest Per-Capita In US Construction History. Oahu public did NOT vote for this massive personal income grab and Rail THEFT.

2016 HART CEO Horner said: “We may stop it downtown, we might stop at Middle Street., We wouldn’t just, without consultation; move forward with that kind of a number. That, to me, is certainly a community decision.” (However Caldwell and Rail Mafia have Oahu at gunpoint.)

NO– the tax paying community is NOT being given a chance to weigh-in on the skyrocketing rail costs that they DID NOT VOTE FOR. The entire rail project has come under the grip of Caldwell’s political gangsterism and the deep pocket propaganda of the Rail Mafia.

Caldwell LYING, Making Hawaii State Legislature into LIARS, Forcing Billions MORE in taxation for his own vain political agenda, now THREATENING Oahu home owners with higher property taxes for him and his Rail Mafia Agenda.

Martin told the Honolulu Star-Advertiser in 2015 that terminating the federal agreement would allow the city “to make more financially responsible decisions as to what course of action to take with respect to the project. We can’t continue to either extend the GET surcharge even further or, in the worst case scenario, have to raise real property taxes to pay for the project solely on the base of that (relatively small federal) obligation.”

Per-capita price for Honolulu’s rail line far exceeds projects across the nation, Star Advertiser

As costs continue to climb, Honolulu rail remains by far the most expensive transit project per-capita being built in the U.S., a Honolulu Star-Advertiser analysis shows. The 20-mile elevated, driverless rail system will now cost about $4,049 per each Oahu resident (currently) to “complete” the project sometime in 2026-2030 “maybe”. Out of the 20 other major mass-transit rail projects in the U.S. receiving federal funding, the Silicon Valley Rail in San Jose, costs $732 per person.

LOW INCOME PAY MOST FOR RAIL, RAIL PROFITEERS PAY THE LEAST FOR RAIL

Victor Geminiani, executive director of the Hawaii Appleseed Center for Law and Economic Justice, said that the GET funding rail is a regressive tax that burdens the island's lower-income residents more heavily than its higher-wage earners. The 20 percent of the state's population earning the least money pays about 13 cents of every dollar to GET, while the top 20 percent pays 7.5 cents.
Before rail went over budget, the federal portion represented about 30 percent of the price tag. That percentage still represents one of the lowest Federal FTA shares of all rail projects. Currently it is becoming closer to 10-15%

Count 5- Manipulating Rail Recovery Plan, Information to the public should trigger Federal Racketeering Investigation of Malfeasance, Lack of Fiduciary Responsibility, Misrepresentation, all tactics of organized crime.

In 2015 HART chair Horner said the city will know costs when key outstanding bids come in. “I personally believe that we’re very close,” he said. “But I wouldn’t anticipate any more money than what’s in the five-year (Legislature) extension. That five-year extension should be the point where I would think that we, as a community, we’re saying, ‘We’ve invested enough in this project.’”

OVER AND OVER, CALDWELL MAKES LIARS OUT OF HAWAII STATE LEGISLATURE (It’s the payoffs?)

Mayor Caldwell and HART have been manipulating and misrepresenting to the 2017 Hawaii State Legislature and general public the exact terms and conditions of a Rail Financial Recovery Plan in order to save his political career and planned run for higher office. Caldwell needs the 2017 Hawaii Legislature to contribute MORE public funds A SECOND TIME so that he can say "Legislature voted for it ALL THE WAY so I must 'finish it.'" (Plan A) The Legislature Budget Chairs have stated “This will make us look like LIARS” (and FOOLS) to the Oahu Tax Payers.

FTA Region 9 Deputy Admin Edward Carranza said that City and HART MUST work on "Plan B" the “build to budget” scenario using $6.8 billion in revenues as its price ceiling. Plan A is a Mayor Caldwell politically "preferred" by plan, NOT specifically what FTA requires. FTA wants either a PLAN- A or B by April 30 as a Recovery Plan. The fact is the FTA WILL accept a Plan B. Mayor Caldwell as boss of the HART temporary CEO is deceiving the Legislature and public for his own political gain. Backing him with deep pocket Rail Mafia media propaganda standing to gain profits for decades from endless funding blank check and lack of financial accountability.

Honolulu City Council chairman Ernie Martin said in a statement: “The FTA is very clear that they want us to build a project with $6.8 billion, regardless of whether or not it fulfills the “vision” approved by the voters. (In 2008 this “vision” by only 52% after spending $5 Million in tax payer funded propaganda lies and outright news media manipulations.)

KHON Reported:
In its letter, the FTA discusses the two options for rail: completing it to Ala Moana as planned, which could cost up to $9.5 billion, or building it as far as the $6.8 billion currently allotted for
the project will allow. The FTA says it “recognizes that Plan A is the City and County’s preferred option,” however it wants both explored in case funding doesn’t materialize for the full line.  
http://www.honolulu.gov/rep/site/csd/Honolulu_Rail_Recovery_Plan_Submission_Extension_1 2.06.2016.pdf

City Council chairman says fed money not needed, but HART and Caldwell want $1.5 Billion  
Honolulu Star-Advertiser  12 Nov 2015 By Gordon Y.K. Pang

City Council Chairman Ernie Martin said he’s tired of being told that the $6.57 billion rail project cannot be changed because the city is being “held hostage” by the conditions of a $1.55 billion federal grant.  (LOGIC THINKING: Not using Fed Grant could SAVE BILLIONS for better project!)

Martin wants HART to consider saying, “Thanks, but no thanks” to approximately $1 billion in unused federal funding if it frees the city from constraints over routing and huge project costs.

“All I would ask you to (do) is you commit to have that discussion,” Martin said, “that the city look at the GET surcharge with the five-year extension, settle what costs we’ve already incurred with the federal government and not be bound by that agreement and not use that as an excuse for us to be held hostage.”

“The (Caldwell) administration … has always hidden behind the (federal agreement),” Martin added. “That’s not something I’m very comfortable with, using that as a crutch. I’d rather eliminate that particular crutch and let’s talk facts.”  (FACTS don’t matter to Caldwell…)

Legislature Being Deceived, Made Into Liars, Fools, Public Cheated Out of Billions in Regressive Taxes and Fees for Caldwell’s political career.

Neal Milner:  We Long Ago Stopped Trusting Anything About Honolulu Rail, Civil Beat

Lee Cataluna: Why would you need a train when the bus already runs that way?

“Mayor’s plan brings rail to new level of insanity,” Star-Advertiser, Volcanic Ash

Caldwell Lying Voodoo Talk – 2012 - “We’ve got the money.”

Kirk Caldwell Voodoo Talk -Honolulu Rail, 2012, Lying: “We’ve got the money.”  
https://www.youtube.com/watch?v=4d6NLNROz68

RAIL TAX EXTENSION - HART: “We have heard you loud and clear” as rail tax extension becomes law- KHON February 2016 Latest projected cost for the rail project is now at $6.57 billion. Oahu residents will continue to pay an extra half-percent tax for rail through 2027.
2017 HAWAII LEGISLATURE BEING MADE INTO RAIL MAFIA LAPDOGS, LIARS AND FOOLS (Maybe it’s the Payoffs?)

Does the Hawaii State Legislature or City Council members understand what BILLIONS mean?

10 Miles of Rail = Built for approximately $5 Billion - so far without any rail stations and without any electrical power system at all. That’s $500 Million a mile, nearly highest in world history.

$500 million cost divided by 5280 feet (one mile) = $ 94,700 US$ per foot or $ 7880 an inch.

Every year the costs projected by the HART Rail project consultant Jacobs Engineering have gone up by a Billion. Statistical models done by the firm tasked with management oversight of Honolulu’s rail project in 2014 showed that a 20-mile line from East Kapolei to Ala Moana could cost as much as $10.79 billion, significantly more than the $8 billion figure that federal and city officials had been using previously. Know that the FTA consultant in 2009 estimated only a 10% chance of rail costs going to $10 billion! Each cost projection eclipsed year after year.

The City-HART are misusing the FTA FFGA to fund primarily a tourism land development promotion operation with insider lobbyists kicking back bribe payments to elected officials as “loans” or “campaign donations,” among other graft and bribery methods.


The method that Kiewit used to attach the rail to the concrete guideway does not follow best tested transit industry standards. HART wanted to show Cost Savings on the project for publicity purposes. Because of the “cost savings” way that Kiewit installed the guideway, the rail attachment method is subject to failure, expensive long-term maintenance and clearly a safety issue. The DC Metro has had similar problems with rail detaching or sliding.

Usually the rail is attached to a concrete surface on the guideway called a plinth. Kiewit eliminated the concrete plinth claiming cost effectiveness, and HART agreed. However, the solution has resulted in a potentially unsafe condition. Kiewit has substituted plastic material to serve as a "shim" rather than concrete to support the rail on the guideway. While this plastic shim has been used in other transit systems, the height of the plastic shim on the HART project is beyond tested tolerances. The thickness of the shims may cause the bolts anchoring the rail to
be subjected to excessive shear under the dynamic load of the train. The multiple layers of plastic shim required to level the tracks may shift. When HART begins running trains derailments are possible.

Hawaii News Now: In a lawsuit filed, McCaughey said the Ansaldo company -- which is being paid $1.4 billion to build the trains and operate them -- cut corners by not hiring the required safety experts. "It's absolutely prevalent throughout Ansaldo joint venture. They do not have adequate staffing to meeting the requirements of this project," said McCaughey. "They didn't have it when I was working for them and they don't have it now." Questions raised include whether taxpayer money meant for the rail project is being diverted to other Ansaldo divisions outside of Hawaii. The Ansaldo parent company has had major issues with graft, corruption with top executives leaving and the parent company completely renaming itself "Leonardo."

KHON September 9, 2016 - Whistleblowers, ex-staff speak out on rail cost and delays: The rail route to Ala Moana will easily cost $10 billion, according to people who have worked directly on the project. That’s a number engineers with direct knowledge of the actual contracts, change orders and payments say is likely. Swatta says while construction prices have risen, an equal if not greater portion of the cost hikes come from bloated administrative procedures, shelved and redone designs, changes HART asks for after contracts are written, and big unresolved cost and timing issues like utilities and HECO matters.

Swatta believes it could be another 15 years before HART rail is operational as planned. The FTA rail consultant believes a “maybe” operation by early 2026 but “possibly” (likely) longer. That’s also what ex-contractor staff believe and everything that has happened has proven that rail will cost FAR MORE and take MUCH LONGER than anyone is being led to believe.

Rail contractors and workers fearing retaliation wrote the board pleading for attention to cost overruns and safety concerns. They warned against the use of plastic shims on the guideway which the FTA PMOC federal oversight report notes have already begun to crack.

Because of very high HART rail job turner another engineer says people fear speaking up. Bart Desai got the boot from his job for Honolulu rail with one of the consulting firms after questioning changes and claims processes. Desai wrote a lengthy letter to HART and the FTA and sees the project topping $10 billion. “Based on the past history and the way that management is reacting and managing the project, there’s no way it will stop here, it could go up more,” Desai told KHON2.

Failed weld inspections on track work being done by Ansaldo and two rail car wheel assemblies called a truck, were rejected due to cracked welds.

FTA investigations of problems at DC Metro show what will happen when HART rail support
fasteners begin degrading and cracking during daily 24/7 heavy rail use. - major operational expenses and commuter service down time. Trains making rumbling noises and vibrations heard and felt in homes and businesses. Also potential derailments.

HART rail has already had to replace plastic rail supports because they were cracking. The DC Metro uses thin concrete supports. Honolulu is using plastic supports. How long will these really last under daily heavy rail operations? DC Metro experience shows rail fasteners will likely will cause the same operations problems for Honolulu rail in the future. This will become a very expensive maintenance problem for HART rail making service unreliable.

Emails obtained by KHON document how HART city staff wanted consultants to take a multimillion-dollar change and break it down to pieces under $1 million each to avoid board scrutiny with staff saying HART’s deputy executive director was OK with that.

While HART touts the accomplishments of miles of guideway built to date, they fail or cover up the shoddy construction that raises safety and maintenance concerns when the system begins operations that may put the riders at risk. HART only recently mentioned, without details they refuse to release, the Westside guideway drilled shafts with columns sinking into the ground beyond acceptable engineering and construction tolerances.

Change orders totaling $15 million approved - Marcel Honoré, Star-Advertiser, Mar 2017, The full 20-mile route’s opening has been pushed to December 2025, but rail’s independent overseers have recently questioned whether that target is realistic. Kiewit’s latest $6 million will also go toward reinforcing underground sections of the West Oahu guideway near a channel that’s “more susceptible to erosion than originally thought,” HART officials said.

Back in April 2015, media reported that large cracks had developed along the concrete segments now under construction, the most recent incident in February 2016. While minor
cracking is to be expected, these major cracks are obvious structural failures that are not acceptable and extremely expensive to repair without the replacement of the entire involved segment. This presents a safety and ongoing maintenance issue and what quality can be expected going forward for the next 14 miles? A train derailment would be a catastrophe.

Count 7  Safety Hazards, Injury Lawsuits High Electrical Field, Electrocution Hazards leading To Safety, Injury Lawsuits

City and HART don’t care about lawsuits – all are paid by Oahu Taxpayers

Rail project saving $140M WITH HECO   By Marcel Honoré   February 17, 2017

Local rail officials and Hawaiian Electric Co. say they’ve agreed to a "cheaper fix" for many of the utility-line clearance problems that have plagued Oahu’s elevated transit project, saving about $140 million.

Under the new $61.5 million plan, which was unveiled at Thursday’s Honolulu Authority for Rapid Transportation board meeting, most of the overhead power lines running along the rail route’s first 11 miles from East Kapolei to Aloha Stadium would (maybe) stay put, and HECO crews would work on them using new, specialized trucks and cranes. “There are still some areas that will be challenging and some clearances that will be tight, but we think we can make it work.” said HECO. If doesn’t work means more expenses, change orders and rail down time.
HECO had warned rail consultants in 2009 that its workers would need clearances of 50 feet to safely access high-voltage power lines near the guideway, but the issue was neglected until 2013 (So that concrete could be thrown up quickly and then huge change orders paid out later.) HECO needs as much as 50 feet of clearance for the “bucket” trucks that carry its maintenance crews to gain access to overhead lines, according to HECO. HECO crews have special protective equipment and safety precautions while rail riders will be directly exposed twice a day up next to high voltage power lines very close and directly over the elevated rail station platforms at the UH West Oahu and East Kapolei rail stations.

Like plastic shims on the rail guideway, "cheaper fix" high voltage clearance means rail riders could suffer health issues (and possible catastrophic derailment) in the future- many of them college students, low income workers and native Hawaiians living on DHHL homelands and attending UH West Oahu using the two local HART rail stations. All "cheaper fix" guinea pigs for daily high voltage EMF exposure and possible eventual liability lawsuits.

Daily access to East Kapolei and West Oahu rail stations will place riders directly under the greatest exposure, within 50 feet or less, to high voltage dual 138 kV and 46 kV EMF power lines. 3D simulated station shows stairs, elevators and overpass walkways from a major parking lot will place rail commuters directly under and in close proximity to high voltage EMF (Electro Magnetic Fields) on a daily basis twice a day as they commute.

Because they are elevated, people are much closer to the main dual 138 kV power radiation than someone walking below on the sidewalk. Being exposed to this radiation every day, twice a day, in humid air, rain storms and electrical storms could be very hazardous. Even the rail track has voltage running along it that can kill a person. The stations will be high voltage EMF fields. More voltage is created as trains enter and leave the station every few minutes.

HECO crews have many protective safety methods working within 50 feet of high voltage power. The average rail rider will have none and will be EMF guinea pigs. kilovolt - a unit of electromotive force, equal to 1000 volts. Expressed as kV. 46 kV = 46,000 volts. 138 kV = 138,000 volts.
Power Line Safety - Even a KITE STRING can conduct electricity and cause electrocution: https://www.youtube.com/watch?v=xy7MWzctTm0

Count 8  Manipulation Of The Public Trust, Elected Officials
Hawaii State Legislature, City Council, Neighborhood Boards. For Caldwell No Sense of Ethics, endless lies – or- It’s about pocketing A LOT OF MONEY!?

Honolulu Star-Advertiser28 Feb 2017  Senators blast city leaders over rail funds

Senate Ways and Means Chairwoman Jill Tokuda grilled them on their budget accounting and laid out the Senate’s new rail measure. **“Have you taken the time to dig through your very own budget to find the money without taxing your own taxpayer?”**

*House Finance Chairwoman Sylvia Luke (D, Punchbowl-Pauoa-Nuuanu) said the tax is among the most regressive levies that can be imposed on citizens. “It hits everybody from the working poor to retirees,” she said.*

Luke said legislators would pursue some detailed fact-finding because what was a $5.26 billion project when the city first asked for an extension in January 2014 has now climbed to $8 billion. *(And actually now much closer to $11 Billion currently.)*

*“A lot of the information we were given was not true, and knowing now that information was withheld from us, whether it was from the city administration or HART, for us that doesn’t matter,” Luke said. “If you’re going to be responsible in taking billions of dollars from taxpayers, I think it’s everyone’s obligation to make sure that the right facts are presented and things are not withheld. The city has lost a lot of credibility with the Legislature.”*

Many Oahu residents **“don’t want us to break our promise again,”** she said, referring to the state’s 2015 approval of a rail tax extension **after rail leaders said that would likely be enough.**
“They think we’re liars” (and Fools)

“At this particular juncture, we still have not seen a number of things from HART and from the city,” Tokuda said. “We haven’t seen a functional budget, in terms of one that’s credible that they can hang their hat on. We have not seen an operations and maintenance plan or a plan regarding its sustainability.”

City Councilmembers unaware HART rail money in jeopardy, KHON Nov. 2015


In a news release, the mayor said federal officials want to make sure there’s enough money from the city to build rail. So they’re withholding the next allotment for the project — $250 million out of $1.5 billion — until the Honolulu City Council approves the general excise tax (GET) surcharge extension. (This means the City RENEGED and BROKE the FFGA Contract.)

In the mayor’s press release, he said it’s “critical” that the extension of five years is passed.

“Definitely I feel rushed. I feel threatened. It’s like, make this decision now or you won’t get your next payment,” Kobayashi said. “Do you think this is just another pressure tactic?” KHON2 asked. “I’m not sure what the mayor is thinking by doing this, but that’s how I perceived it,” Manahan said. KHON2 reached out to the mayor’s office several times today to ask the mayor about the FTA meeting, as well as the lack of communication and pressure tactic councilmembers were talking about. He agreed, then canceled.

However Manahan’s position has since changed, possibly because he has come into a lot of money and promises of political advancement from the Rail Mafia: “We need the Legislature’s support to invest in a better future with us (paid off politicians) and to recognize the role rail will play in improving the quality of life for the people (land developers and contractors) of Hawaii,” Manahan said.

Honolulu Rail and Mayor Textbook Example Of Worst Case Public Manipulation, Lying by City Official and HART Rail

Rail mega-projects require massive lying to the public: see Bent Flyvbjerg, https://en.wikipedia.org/wiki/Bent_Flyvbjerg An infrastructure project that exhibits at least two out of three bad outcomes: 1) Large cost overruns, 2) Long project delivery delays, and 3) Much lower usage than forecast. Bent Flyvbjerg, et al. Delusion and Deception in Large Infrastructure Projects: Two Models for Explaining and Preventing Executive Disaster,
One of the flaws in megaproject development is strategic misrepresentation, or clever lying to the public and decision makers (such as the HART board members and the Honolulu city council members, none of whom have any expertise in large infrastructure projects and rail in particular.) Project funder FTA allowed the City to wildly misrepresent facts which simply fit the political line that the proposed 20-mile rail will cost $4.6 billion as applicable for the 2008 rail referendum. The FTA-sponsored report contained one point of truth: There is a 10% chance that HART rail will cost about $10 B. This is now 100% FACT.

The project vote got a marginal (50.6%) public support in a 2008 referendum. Hawaii’s typical “Gravy Train” system of inept, somewhat criminal “Hawaii project management” style has turned a $5 Billion taxpayer rail project a likely $20 Billion project delayed by 10 years.

FTA emails released under FOIA in 2011 revealed the FTA prediction that Honolulu WOULD screw the whole rail project up because of well-known government and political corruption and incompetence. FTA predicted in 2009 that there is a “10% chance” that HART rail will cost about $10.5 B. So back in 2009 FTA already KNEW the ACTUAL costs would be at least $10 Billion. At $500 Million a mile the full Ala Moana buildout will most likely be $20 Billion. Caldwell will be back many times for many more City and State extensions, taxes, fees and rate increases.

Count 9- Dismantling TheBus Service To Feeder Status, Conspiracy, Coercion, Rejecting Less Expensive Alternatives-

Forcing Low Income People Ride Rail – Basically At Gunpoint – City and HART Reject At Grade Rail, Bus Rapid Transit, Expanding TheBus and totally ignore Smart Electric Vehicle Revolution

In 2016 HART’s chief rail architect, Ken Caswell, left the project after seven and a half years.

PBN talked to one of the rail project's first architects, Douglas Tilden

One of rail’s first architects speaks out about elevated design Kathleen Gallagher PBN 2016

The Honolulu rail project has received a spate of criticism for its design, a 20-mile elevated train line that will separate downtown Honolulu from its waterfront. PBN talked to one of the rail project’s first architects, Douglas Tilden, about his year-long experience on the project and why he left. In 2007, InfraConsult’s chief architect, Douglas Tilden took a look at the system and said the rail should be at grade and not elevated.
“There were so many light rail systems that could be emulated,” Tilden told PBN in a phone call. “Excellent projects that were carefully spent. It is nothing short of a crime to run it elevated downtown and I told them that. They argued that if you ran the trains at grade the traffic on the roadways wouldn’t allow for efficient service,” he said. “However, all around the world they do it and even if you believe that, you can’t justify the money they are spending. Light rail is significantly less expensive.”

“There is a transit point of view, what they are doing is sheer lunacy,” he said. “The key goal of any transit system is to get the people interested by having it downtown first. Honolulu has made a huge mistake.” He concluded: “I think Honolulu will be a poster child for how not to put a transit system in the city...they couldn’t be doing it any worse, it’s mistake after mistake.”

Ansaldo Rail Cars Faulty – Parent Company Busted For Bribes, Corruption renamed Leonardo

TheBus is one of America’s best bus transit systems and has a 6% commuting trip share in Honolulu. Many of its routes will be eliminated or terminated at HART stations. Getting from Ewa Beach to Downtown in 50 minutes by TheBus for $2.50 sitting in a seat will be eliminated to make the HART trip 1 hour 30 minutes, three times as expensive and requiring three transit mode changes each way and likely not having a seat two-thirds of the time each way.

Caldwell and HART misuse the EIS statistic that rail is projected to remove 40,000 cars from the streets. The actual FEIS statistic says that rail “may” reduce car trips by 40,000 on Oahu when rail is completed (was 2019 but currently December 2025 “maybe.”) where HART rail may provide a 1 to 1.4% reduction. This for $500 Million a mile in current construction costs.

http://www.newgeography.com/content/005156-live-honolulu-hart-rail-a-megaproject-failure-making

On a per-capita basis Honolulu Rail is the nation’s largest infrastructure fiasco by far. It is the worst design possible because it combines an intrusive and expensive infrastructure including 21 elevated stations, and a low passenger carrying capacity with over 60% of it as standing passengers.

City Ignored Many Warnings From Everywhere That Elevated Rail Construction Costs Would Skyrocket

Lingle independent financial analysis of project cost by IMG: will be more than the $5.4 B
2010: Outgoing Governor Linda Lingle releases an independent financial analysis of the project by IMG and Thomas Rubin which concluded that construction cost will likely be more than the $5.4 B projection, ridership projections were both very high and would require passenger loads significantly higher than that of any U.S. transit operator, future rail renewal and replacement costs were ignored, operating subsidies were significantly understated, and many projected revenues were significantly overstated. A highly accurate assessment 7 years ago!

Count 10 – Super Expensive Operations Cost, HART Rail Will Most Likely Be The Highest Annual Electric Bill In Hawaii History

Rail needs so much power that there’s a concern of how HECO can supply that. The train needs 30-50 megawatts, about what 15,000 homes would use at peak energy times.

Another major HART misrepresentation is that rail planners pretended that the rail is like an electric car and just plugs it into the city grid for “free.” However, rail’s 30 MW to 50 MW power draw is a major requirement. The combined cost of substations, power generation and the still in limbo airport utility relocation tasks are likely to cost $500 Million none of the 21 stations constructed nor the second half of the project finalized.

Who will pay for the new HART substations and traction power plants required? How will line relocations be handled and paid for? Who’s undergrounding the wires and paying for that? Not to mention, what will the train’s power bill be for decades to come? With only about 15% of the project completed and only about half of the project gone to bid, In 2014 HART announced a $910 Million expected shortfall and lobbied the Hawaii legislature to extend the 0.5% surcharge from end of 2022 to end of 2027. This would be “enough” said HART and the City.
Count 11 – Super Expensive Final Segment Construction Costs
Rail From Open Farmland To Dense Low Sea level Urban Nightmare

While Rail encountered major cost overruns and change orders building in open flat farmland, the most incredibly difficult and massively expensive part of the project has yet to begin!

Next Major HART Rail Construction Phase A Total “Big Dig” Nightmare Costing Many Billions


The second half of the HART rail project includes the extremely challenging at near sea level construction through urban Honolulu which is one of the densest US cities. With heavy construction for many more holes and pillars than required in West Oahu, debilitating lane and road closures downtown and near Waikiki will be extremely deleterious to general economic activity and tourism. Ground water only 2 feet below the surface known for underground streams, springs, crushed coral, iwi burials and unmapped sewer and water pipes. It will be an epic mess for the world to see what a huge inept transit fiasco the HART Rail really is.

By then KMurthy will be the next HART CEO casualty but will be given the contracted great Golden Parachute payoff by the Rail mafia. Then next CEO hired will of course again promise everything will be just great from that point forward. It’s really all about lying to the public and politicians getting their bribes to keep it going. Hawaii’s unethical government “at work.”
Expected Payoff for $500 Million A Mile Rail – About 1% Traffic Reduction “Maybe...”

With an expected “payoff” of about 1% in traffic reduction on H-1 and the destruction of TheBus, once rated as the best in America to now become a rail feeder forcing commuting times and costs to more than double. **Bus, rail, bus seat changes TWICE A COMMUTER DAY (Honolulu Ansaldo rail cars have few seats – known in the industry as Cattle Cars.)**

**Meanwhile, Private Industry Will Be Providing The Traffic Solution As Rail Squanders Billions**

*Honolulu WILL actually reduce traffic congestion by more than 25% and reduced its dependency on oil by over 40% as Electric Cars are rapidly phased in as early as 2020.*

Honolulu burns oil to produce electric power for homes, businesses and for rail. **As a result its electricity cost is 300% above US average. Rail Mafia policies promote oil-generated electric trains rather than PV powered electric vehicles.**

HART rail can’t run on PV sun generated electrical power because of the high traction power demands of rail, especially at four car trains running night and day every 5 minutes. **However, electric cars and buses can run all day over 200 miles after being charged by PV panels. Vehicles can be charged while they are parked. And then run for over 200 miles before recharging.**
Why Energy & Transportation as we know it today will become obsolete

Google has never given a formal deadline, but has suggested it’s working on having the technology ready by 2020.

Toyota is looking to have a driverless car ready to go by 2020.

Volvo is aiming to make its cars "deathproof" by 2020.

Nissan and Honda are committed to have a commercially viable autonomous car on the roads by 2020.

Daimler, the maker of the Mercedes-Benz, is aiming to have its driverless trucks ready by 2020.

PSA Groupe, the second largest car manufacturer in Europe, is aiming to have fully driverless cars ready by 2020.

Clean Disruption - Why Energy & Transportation will be Obsolete by 2030 - Oslo, March 2016

https://www.youtube.com/watch?v=Kxryv2XrnnqM

High Occupancy Toll (HOT) lanes created virtually by Smart Electric Vehicles. By 2020 this predicted future will be a reality because E vehicles are becoming computers on wheels guided by Artificial Intelligence, GPS, Collision Avoidance, etc. 30-40% increase in H-1 utilization.

COUNT 13 – Government Corruption, Destruction of Public Trust

The HART Rail is the greatest Corruption of Hawaii’s political system ever in history. Massive Loss of Confidence that government works

The rail tax is for Caldwell insiders to suck away money for decades using it to bribe elected officials. It creates an endless cycle of corruption and bribery corroding the entire government and political system AT ALL LEVELS.

They use that green, smart-growth TOD argument and then use the same mistakes that have been made in the last 30-50 years of American suburbia. That’s because the Rail Mafia and
their goons are only interested in the MONEY. This is what CORRUPTS the entire Hawaii political system that will becomes an unsustainable moral and environmental bankruptcy.

Greatest criticisms of rail has been the city’s LACK OF transparency and public manipulation.

“The city has spent millions – $5 million just lobbying for people to vote ‘Yes’ said Councilwoman Ann Kobayashi. “They never gave the other side of the story, like how much it would cost – and in fact, they gave the wrong figure of the cost. And they use city money for this.”

Kobayashi said the attitude of the city in moving forward was not limited to campaigning. She said a meeting where someone had “brought up an alternative to rail, the mayor told them if ‘If you’re going to say that, have your own meeting’,” she said. “They didn’t want any alternatives being discussed at this city meeting. You know– there’s so much (payoff) money involved.”

In addition, in 2008 the City received criticism for releasing the Draft Environmental Impact Statement (FEIS) – a study that examined possible environmental and societal effects of the rail project – only two days before the general election, in which a city charter amendment on rail was to be voted on. Kobayashi suggested then that it had been done to withhold information from early voters.

**Graft** is the personal gain or advantage earned by an individual at the expense of others as a result of the exploitation of the singular status of, or an influential relationship with, another who has a position of public trust or confidence. The advantage or gain is accrued without any exchange of legitimate compensatory services.

Behavior that leads to graft includes **Bribery** and dishonest dealings in the performance of public or official acts. **Graft** usually implies the existence of the lack of integrity that is expected in any transaction involving a public official.

**Bribery** is the offering, giving, receiving, or soliciting of something of value for the purpose of influencing the action of an official in the discharge of his or her public or legal duties. The expectation of a particular voluntary action in return is what makes the difference between a bribe and a private demonstration of goodwill. **To offer or provide payment in order to**
persuade someone with a responsibility to betray that responsibility is known as seeking **Undue Influence** over that person's actions. When someone with power seeks payment in exchange for certain actions, that person is said to be **peddling influence**. Regardless of who initiates the deal, either party to an act of bribery can be found guilty of the crime independently of the other.

A **bribe** can consist of immediate cash or of personal favors, a promise of later payment, or anything else the recipient views as valuable. When the U.S. military threatened to cancel a Texas relocation company's contracts to move families to and from military bases, the company allegedly gave four representatives in Congress an all-expenses-paid weekend in Las Vegas in January 1989, and $2,500 in speaking fees. **The former president of the company was indicted by a federal Grand Jury in 1994 on bribery charges for both gifts.**

**HART's financial plans are not reliable (LIES), cost projections lack supporting documentation (MISREPRESENTATION), has no plans for operating and maintenance costs.**

**In Hawaii we have a Rail Mafia - there really should be a federal investigation using RICO racketeering laws. Racketeering is a minority of organized criminals using the government system for insider dealing and profiteering, stealing from and defrauding the majority of Oahu tax-payers.**

City Auditor Edwin Young has claimed that **rail officials tried to intimidate his audit team when they reviewed the rail authority's finances**. In his audit, Young concluded that **HART's financial plans were not reliable, that cost projections lacked supporting documentation, and that it had no plans for operating and maintenance costs. April 2016**

**City audit calls HART’s finances, plans ‘outdated and unreliable’ KHON April 2016**

http://khon2.com/2016/04/15/city-releases-audit-of-honolulu-authority-for-rapid-transportation/

*The audit found several instances of HART projecting costs rising way higher than could be proven, while HART under-reported what its take of the GET surcharge would be. The audit says there’s no supporting documentation for $450 million worth of cost hikes for that. Some of the biggest problems ahead have to do with the unresolved power utility and relocation costs.*

Huge utility agreements totaling more than $100 million weren’t even in the system’s forecast report. **Another $46 million in “project enhancements” could not be supported either.** HART turned over a handwritten escalator price guess of between $17 and $25 million. **HART also paid $1.5 million to firms that lost bids without regard for their actual costs.**
HART Rail forensic audit – never done

The city Auditor’s report further stated that HART’s latest cost overrun figures aren’t reliable — and that they’re likely to climb even further. April 2016


By this time (2028) rides from home to office will be in comfortable electric vehicles and rail will have next to zero riders. Previously it was predicted to have 1-1.4% costing $500 Million a mile.

Count 14- Rail Land Profiteering Using FTA Commuter Transit Grant - MORE LIES and MISREPRESENTATION “Commuter Transit” really a Loss Leading EXCUSE for Tourist Railway to Sell land, Condos, Make Insiders Super Rich

The age of 19th Century heavy SWSR is long over. The 21st Century is coming very fast with Smart electric vehicles. H-1 will see new virtual lane space created. This is the near future. All of the major Smart Money in the US and World are investing in it. The new views on this Tony Seba presentation are 1000 a day: https://www.youtube.com/watch?v=Kxryv2XrnqM

Empty countryside and valuable farmlands must be packed with housing tracts and high rises to create rail ridership projections, glut parks and beaches

The rail start is at KROC gymnasium out in the middle of former Ewa Plantation farmland fields. Instead of going down Farrington Highway into the actual “Second City” of Kapolei where many open city blocks remain for townhouses and business offices, rail is being built for tens of thousands of people yet to come to Oahu, yet to move into homes that have yet to be built.

The valuable farmlands will covered over in asphalt and concrete for a planned California suburbia with a fake Hawaiian name. The “Hoopili” EIS actually projects only an extremely small number of residents will actually ride the rail cars.
Caldwell a well paid banker receiving up to $299,000 annually (2015 disclosure) and real estate lawyer who as elected mayor is gaming the system to benefit himself and insiders profiteering from public monies and at public expense. This indicates a high level of lack of ethics, fiduciary responsibility, personal profit motives, malfeasance and obvious conflicts of interest since rail is primarily about banking and real estate development. The Hawaii State Constitution prevents State employees doing this, but not the City- says City Ethics Board

‘No conflict’ doesn’t mean mayor’s bank post is ethical – DAVID SHAPIRO, Star Advertiser

Question to him: Unless he lays golden eggs, what could he possibly provide in an hour a month that’s worth $299,000 to Territorial other than political influence? The bank and its clients have a strong financial interest in everything the city does related to housing — planning and zoning, property taxes, building codes and permits, roads, rail and public works, among others. Civil Beat has reported that executives at the bank donated at least $25,000 to his mayoral campaigns. No conflict of interest? Caldwell and his wife, Bank of Hawaii executive Donna Tanoue, had joint income of at least $864,000 in 2015 and owned millions worth of stock from their banks.

Asked by Civil Beat - Why is rail being built? Newly hired HART CEO K. Murthy: "To promote development in West Oahu and make life easier for tourists..." HART Hires KMurthy As Interim Director For Rail Project, Civil Beat, 2016

Murthy, approved unanimously by the board Thursday morning, will be paid $400,000 for his year as interim director plus paid housing, transportation and relocation expenses. He also will be eligible for a 10 percent bonus if he meets certain goals required by his boss Caldwell. If
Caldwell approves of Murthys “performance” he will also get a generous Golden Parachute equal to his annual salary. Other Rail Insider benefits not publically disclosed.

25% Bribe – Rail Doesn’t NEED the Construction money, It’s really all about Real Estate Land Sales

Rail is really just a real estate land development scam, not a commuter system. It doesn’t really matter HOW LONG it takes to build. The requirement is for the ENDLESS MONEY- BLANK CHECK. Then HART Chair and banker Don Horner had the HART board go into executive session and suggested that in order to get the rail tax extended they should offer the legislature a 25% cut!!! What does that say? That says the MONEY is in the real estate deals and rail is just a LOSS LEADER to sell property!

Rail Creating Unsustainable Overdevelopment, Leaving Hawaiian, Going Hong Kong (Rail not a SOLUTION, Rail is THE PROBLEM.)

Communist Party of China Sinking Money Into West Oahu Lands For Mega Resort Connected by FTA - Oahu Taxpayer Paid Tourist Railway

China Oceanwide Holdings Group was founded in 1985 by Mr. Lu Zhiqiang, the founder, legal representative, Communist Party secretary, and chairman of the group, as well as a member of the standing committee of the 12th Chinese People’s Political Consultative Conference, vice president of the China Non-governmental Chamber of Commerce, deputy chairman of the Oceanwide Foundation, deputy chairman of the China Foundation for Guangcai Program, and deputy chairman of the China Minsheng Banking,
Heavy Elevated Rail Being Built For Big Land Development Tourist Brochures, Videos – NOT Commuter Service. Rail Mafia insiders fraudulently using FTA commuter rail money to create attractions for China Oceanwide Holdings and their Mega Resort Plans in West Oahu.

This new major project would be the first of its kind in Hawaii and the U.S. Described as being similar to Atlantis The Palm, Dubai, which has a waterpark, an aquarium, a dolphin encounter area and sea lion park. It also has more than 20 restaurants, a nightclub, spas, salons and a fitness center. There will be LOTS of ChiCom money to grease the palms of Hawaii politicians!

So now you know the BIG CHESS GAME RAIL CON JOB BY WEST OAHU LAND DEVELOPERS. The truth is, rail is being built to sell West Oahu land, not as a commuter service as was promised to voters. The whole project has a long history of lies, public manipulation and misrepresentation. Currently the City and contractors are lobbying the State Legislature to make them culpable in crimes against Oahu Taxpayers. Leeward Shore to become EXPENSIVE.

Environmental Groups bought off to be fronts for approving rail as “Green” and “Smart”

Although HART, Blue Planet and the Soldout Club makes a big deal out of Transit Oriented Development, DR Horton’s own EIS reveals that each station will generate the equivalent of only two busloads of passengers for the rail in the peak hour.

Extend Rail Tax says Shem Lawlor of Blue Planet in Civil Beat article, previously a five year City DPP Transit Oriented Development employee – but using BP sounds more legitimate and environmental rather than just another rail shill.

“In the rail project’s Environmental Impact Statement the city projected approximately 120,000 daily boarding’s by 2030. They also projected an increase in daily public transit trips from 184,700 to 282,500 with transit’s share of all trips on the island rising marginally from 5.7 percent to 7.1 percent from 2007 -2030.” (The EIS is loaded with lies and gross exaggerations.)

(The EIS was done a decade ago by Parsons Brinkerhoff and has been proven to be wildly wrong. Parsons Brinkerhoff also did the projections for San Juan, PR rail. By late 2005, however, ridership had fallen to 24,000, less than one-third of the 80,000 projection and well below the projection of 110,000 for 2010) Honolulu has far fewer transit dependent commuters than San Juan where most people don’t own cars and don’t have reliable bus service.

Tren Urbano is currently made up of a single rapid transit route like HART. It consists of 16 stations, ten of which are elevated, four at grade or in open cuttings, and two underground. Ironically, the Tren Urbano goes mostly through suburban stations designed to handle three permanently coupled pairs (6 rail vehicles). HART plans 4 coupled rail vehicles.
The agency overseeing Honolulu rail’s construction is relying on outdated financial figures and budgets, and it could take steps to complete the project more “economically, effectively and efficiently,” a city audit has concluded. – April 2016

Shem Lawlor admits: “Rail skeptics are justified in questioning whether it’s worth spending $8 billion to $9 billion to build a system that only shifts 1.4 percent of trips from cars to transit.” (However we need to lie to the public so that they believe in a decade when there are massive land developments and unsustainable populations that rail ridership may finally come close to what we guess will be the ridership that PB wildly misrepresented.)

While he also admits that the City hasn’t established any ridership “goal”, but states “it is critical that the rail project avoid further delays and is built all the way to Ala Moana Center.” Ca-ching. Paycheck for Blue Planet.

Clearly his and the Blue Planet agenda is supporting lots of land development over the next decade by turning Oahu into Hong Kong with every rail and bus stop a “Transit Oriented Development.” The Oahu General Plan update is actually proposing to cover Oahu in TOD’s.

Then the REAL hype:

“With the city’s current plans to run trains every five minutes during peak hours and 10 minutes during off-peak hours, the system could accommodate over 300,000 daily boardings.” (Only when West Oahu becomes like Hong Kong.) This is a totally useless statistic that Lawlor is full of. It IGNORES the major trends in self-driving electric vehicles coming now everywhere.

“The city could develop high frequency express bus service connecting Leeward, Ewa and Central Oahu communities to the rail system, and connecting Windward Oahu and East Honolulu to the Urban Core.” All of this has been going on for years with TheBus. Rides from Ewa Beach to Downtown in 50 minutes using the Express E bus and Express traffic lanes. The major trends in self-driving solar charged electric vehicles coming now will totally nullify and transform ALL FUTURE H-1 TRAFFIC AND TOD PROJECTIONS.

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“An expanded public transit system could handle over a million daily trips, putting an end to traffic congestion, improving mobility, reducing CO2 emissions, and saving Honolulu’s households hundreds of millions of dollars annually.” More useless Yack for a Rail Mafia paycheck. The Age of Smart Electric Vehicles Is At The Doorstep. How can the Rail Mafia stop it? The Rail Ridership projection insanity assumes Oahu residents live for standup train trips.

To achieve Blue Planets dream of 300,000 daily boarding’s requires the destruction of prime agricultural land on Oahu. This is really “environmental” for Blue Planet and the Soldout Club that get their money from Rail Pushers. DR Horton’s 12,000 California style suburbia home development includes two rail stations paid in part by FTA which claims no mitigation responsibility even though the legal NEXUS is obvious.
Vancouver Provides The BIG MODEL For Honolulu To Follow According To Rail Mafia: Metro Vancouver Regional District 2.463 million population connected to all of Canada and the US.

Does this sound like Honolulu’s ridership market in the middle of the Pacific Ocean? Will tourists arriving at the HNL airport with baggage want to walk way over to get onto a standup rail cattle car to go to Ala Moana, or instead, into a comfortable limousine or free air conditioned passenger van taking them directly to their hotel or car rental? **Tourism rail ridership is over exaggerated like all the other highly exaggerated HART ridership numbers.**

Everything rail is based on a Hong Kong or American suburbia development scheme leaving Oahu a wasteland of political corruption and unsustainable bad environmental "planning."

PRP Move Oahu Forward rail propagandists have tons of money to elect goon politicians and run endless ads night and day everywhere because they have been making huge amounts of money from sucking rail tax money out of the helpless public under the control of the Rail Mafia. **Not what this island of under 1 Million wants, needs or can ecologically sustain or pay for.**

West Oahu Campbell Estate land developers have no sense of the Konohiki Ahupua‘a Responsibility and are the ones who created ‘the Second City’ in West Oahu by transforming agricultural land into development lots. They are creating sprawling suburbia without sustainability. **You can't take this and add an elevated rail system and pretend that solves the traffic problems.**
Beaches and parks already overcrowded. Ground water within 2 feet of the surface. Cesspools leaking everywhere into shoreline swimming areas. And the Rail Mafia has massive expansion plans with high rises everywhere for rich, which is why the rail is being built - to sell overdeveloped lands to mostly rich foreigners and drive out the local residents and families.

COUNT 15 – Contract Fraud, Perjury, Malfeasance, Jeopardizing Public Funds in Future Lost Infrastructure, Negligence,

Lack of Emergency Disaster Contingency Plan, Project in Predicted Tsunami Zone

Natural Disasters Coming TO HAWAII As Forecast By FEMA and NOAA

Building in known floodplain disaster area is careless, reckless and an act of criminal negligence if not a total lack of Fiduciary Responsibility by elected officials.

The City-HART are misusing the FTA FFGA to fund a primarily tourism land development operation for insiders kicking back bribe payments to elected officials as “loans” or “campaign donations” among other methods. *Future rail-TOD lands will be submerged.*

The City and HART Rail are risking FTA Federally Funded Assets in Identified Disaster Zones

*Map showing the route in Tsunami Evacuation Zones: [http://frenzel.us/images/tmaprail.jpg](http://frenzel.us/images/tmaprail.jpg)*

*At least seven HART rail stations are in sea level 2010 Tsunami Evacuation Zones as well as hurricane storm surge flooding and identified Sea Level Rise areas causing permanent loss.*
Why is the City and HART building rail stations and Transit Oriented Development right next to the Oahu shoreline? Florida is already building one story higher local roads and streets.

The Hawaii State Legislature “recognizes that climate change poses immediate and long-term threats” yet why is the City, with State Office of Planning support, developing Transit Oriented Development in projected Sea Level Rise, Tsunami Zones and Hurricane Storm Surge Flood Areas according to City, State and Federal FEMA maps? Makes no sense – but this is Hawaii.

"The XTEZ does not replace the current tsunami evacuation zone; it adds a second zone for a potential XT event." The XT Event is a massive expected Aleutian or Pacific Cascadia tsunami.

All kinds of Federal advisories, POTUS EO’s, the US GAO policy research for the US Congress shows this is VERY BAD POLICY if not outright ILLEGAL ACT that the FTA is allowing HART rail to proceed without a new SEIS which would save BILLIONS in lost infrastructure in the next big tsunami, hurricane storm surge or eventual Sea Level Rise.

This was all greatly detailed in US DOT and FTA studies as the "Lessons of Hurricane Katrina and Hurricane Sandy" before HART rail began construction. The Honolulu Tsunami maps show HART rail’s fourth segment is in a tsunami flood zone since 2010.

COUNT 16 – LIES and PERJURY: To Obtain ROD and FTA FFGA Grant
HART Rail Final EIS Committed Perjury and Fraud To Get $1.5 Billion

A new Supplemental Environmental Impact Statement (SEIS) to choose a safer route should be required based upon all of the best science and engineering evidence. Here’s why:

The Final EIS did NOT evaluate the Project as being in an identified Tsunami Evacuation Zone, which Federal advisories now also identify as flood zones. Flooding by any means is a flood.

Appendix J, FEIS, June 2010, includes a summary of the Project’s relationship to land use plans, policies, and controls as documented in the Final EIS and technical reports completed for the Project.
We are extremely concerned that the June 2010 Project FEIS specifically states in Appendix J, Section 1.3, Coastal Zone Management Program, Chapter 205A, Hawaii Revised Statutes, Page 6 and again Appendix J, Section 2.6, Special Management Area, Page 80, that “The Project is not located in a tsunami evacuation zone”

RAIL TOD FLOOD ZONE: Human Lives and Billions Lost Ignored By FTA, HART and City Mayor

http://khon2.com/2016/06/05/mapunapuna-businesses-flooded-after-high-tide-brings-overflowing-waters/


Spending BILLIONS to build HART rail and TOD’s in these very same low sea level zones that will suffer billions of dollars in future infrastructure damages is an irresponsible act wasting Federally funded assets and endangering the lives of thousands. The City has NO MITIGATION FUNDS, PLANS, or EMERGENCY CONTINGENCIES for the loss of this critical publically funded infrastructure.
Further, under Coastal Hazards, Table 2, Page 9, Objective, “reduce hazard to life and property from tsunami, storm wave, stream flooding, etc,” Policies: B, “Control development in areas subject to storm wave, tsunami, flood, etc,” This box is checked “Not Applicable.”

Based upon the fact that 2010 City Department of Emergency Management Tsunami Evacuation Zone maps were published and available at the time the 2010 Final EIS was published leads to a troubling conclusion that the FEIS intentionally omitted this in two separate areas of Appendix J in order to obtain a favorable FTA ROD to commence immediate construction. The low sea level route and station designs have NOT YET been finalized.

There has always been an Alternative 4A Route which the Project had previously evaluated which would have entirely avoided all of the 2010 and 2015 Tsunami Zones with the exception of the downtown, Kakaako and Ala Moana area. Further, the major 138 kV powerline issue requiring relocation and/or undergrounding could also have been avoided.

However Alternative 4D along the shoreline was instead chosen as the preferred route placing a significant part of the Rail Project into low sea level Tsunami Zones and into the Dillingham power lines. Sea level rise will continuously push the high ground water table ahead of the creeping ocean level. All best science and engineering documentation clearly show this will be a hugely expensive disaster in every way possible with loss of FTA funded rail infrastructure.

There is very great potential for harm to human lives and loss of billions in property and critical transit infrastructure from the badly chosen Alternative 4D route.

Relevant CFR’s:

In §771.130 Supplemental environmental impact statements, part 2 states: (2) The Administration decides to approve an alternative fully evaluated in an approved final EIS but not identified as the preferred alternative. In such a case, a revised ROD shall be prepared and circulated in accordance with §771.127(b).

In §771.130 (e) A supplemental draft EIS may be necessary for major new fixed guideway capital projects proposed for FTA funding if there is a substantial change in the level of detail on project impacts during project planning and development. The supplement will address site-specific impacts and refined cost estimates that have been developed since the original draft EIS.

In addition is it further greatly troubling that the City and FTA are actually assisting and encouraging Transit Oriented Development (TOD) within both 2010 Tsunami Evacuation Zones as well as the updated and expanded 2015 Extreme Tsunami Evacuation Zones. These plans virtually ensure widespread loss of billions in critical infrastructure and potential deaths of
hundreds of rail passengers and TOD business operators and employees who could be trapped in a locally generated earthquake tsunami event.

City Department of Emergency Management data supplied for these evacuation zones state "Vertical Tsunami Evacuation - Evacuate to the FOURTH floor or above in a reinforced concrete or structural steel building of TEN stories or more. All others, evacuate inland to higher ground."

The Project is further directly encouraging commercial development in identified tsunami zones that are widely predicted by scientists to become future disaster areas. The City and FTA encouragement to construct in best science identified disaster zones will also likely result in major litigation against the City and the FTA in the future after a major disaster.

Not only is Honolulu widely regarded by experts to be long overdue for a major tsunami and hurricane, all current best science predictions show greatly increased probabilities of more powerful future storms, likely accelerated sea level rise and the major threats of the San Andreas and Cascadia faults producing huge Pacific tsunamis. The City DEM 2015 Extreme Tsunami Evacuation Zones were a result of predictions for a Great Aleutian Tsunami which adds a further major tsunami threat.
Environmental Analysis, Consequences, and Mitigation states: Flood Zones - Protection of floodplains and floodways is required by Presidential Executive Order 11988 (USEO 1977); USDOT Order 5650.2 (USDOT 1979); the Federal Aid Highway Program Manual (FHWA 1992b); and 23 CFR 650 (CFR 1999). These regulations place special importance on floodplains and floodways and require Federal agencies to avoid conducting, allowing, or supporting actions on a floodplain or within a floodway. If a project is located within a floodplain or floodway, results from sufficient analysis must be included in the project’s Final EIS, as specified in USDOT Order 5650.2.

Big Rains will SHUT DOWN Rail Transit, as will hurricane storm surge and tsunamis. Entire area is in FEMA Flood Zone. HART Rail LIED and said project NOT in Flood Zone to get FTA $1.5 B.

http://www.civilbeat.org/2016/07/sewer-spills-road-closures-handi-van-problems-in-darbys-wake/ Middle Street Transit Center Flooded By Hurricane Darby, Civil Beat

Roger Morton, head of Oahu Transit Services, said 13 city buses for disabled people are out of commission this week after getting flooded Sunday evening while parked at the Middle Street Transit Center. He doesn’t know exactly when they will be back up and running but hopes that will occur within a week after the city orders and receives new parts.

Sand Island WWTP will be a DISASTER after a REAL STORM, Tsunami... Honolulu on the EDGE

Tens of thousands of gallons of wastewater also spilled in nine separate incidents as a result of the storm. Department of Environmental Services Director Lori Kahikina said the city’s sewer system is not built for the volume of water that entered the wastewater pipes last night. In Honolulu HEAVY RAIN shuts down everything. Imagine a Hurricane or Tsunami!

COUNT 17- NEW SEIS: City Building Rail, Stations and TOD’s In Identified Disaster Areas, Will Require A New Supplemental Environmental Impact Statement

Caldwell Rail HIDING FACT: – NEW RAIL SEIS WILL BE REQUIRED

Ending the rail line at UH, Martin said in 2015, could be done if the city chose a new route and bypassed Kakaako and Ala Moana Center. “I’m sure they’ve done some of those preliminary studies already,” he said. “I would think the ridership would be more attractive going to UH-Manoa than it would be going to Ala Moana Center.”

However, Rail to Ala Moana is a Caldwell Rail Mafia Agenda and they do NOT CARE that the entire infrastructure is in a KNOWN DISASTER ZONE
Zillow map shows $20 Billion Real Estate Loss where HART building RAIL-TODs

Nearly 40,000 homes, $25 Billion in real estate loss

http://cdn2.blog-media.zillowstatic.com/3/Honolulu-798d2f.png

Considered Hawaii's and one of the world experts on Sea Level Rise, Dr Chip Fletcher, UH SOEST says no matter what anyone does now- it's too late already. At the World Conservation Congress he said Hawaii can expect 1.5 meters of SLR. Keep in mind- with SLR comes an ever more advancing ground water table, 100's of yards inland, pushed by the sea. Fletcher said: There is NO WAY to prevent the rising ocean. It's coming... Need to start adapting ASAP.

The Caldwell Rail-City TOD policy - build rail as soon as possible in low sea level coast lands so that realtors and developers can profit before long, long delayed City and State Sea Level Rise policies are adopted. Lands can be sold to buyers without required vulnerability warnings.

Do The Math HART: 1.5 meters = 5 Feet! HART Rail Sea Level Rail Route Disaster - Stations and TOD's in swamps or under water. A great FTA and City TOD investment for 25 years? Caldwell and the Rail Mafia don't care- they will continue to spend and pocket BILLIONS

Ahead of the Tide – Chapter 1: Florida’s Lifeblood – Hawaii’s Lifeblood

https://vimeo.com/155312971

Goodin: Climate Change and Sea Level Rise: Potential Impacts on Real Estate

http://goodin.us/Goodin.pdf

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COUNT 18 – Build To Budget: City, HART Refuse To Save Oahu Tax-Payers Billions By “Build To Budget” As FTA Advises In Letters

City and HART Want Billions MORE and NOT “Build To Budget” Cost Savings

48 seconds in HART Chair Hanabusa goes over in detail the OPTIONS FTA is offering to keep the full $1.5 Billion and "Build To Budget."

https://www.youtube.com/watch?v=184zEAnECvM&t=48s

Letters between FTA, CC, Mayor, etc. where everyone agrees to "Build To Budget."

Now its become a Steal-on, Steal-on Rail Mafia Lying And Self-Serving Racketeering Operation
It's become a Rail Mafia - there should be a federal investigation using RICO racketeering laws. This is a minority of organized white collar criminals using the government system for insider dealing and profiteering, stealing from and defrauding the majority of Oahu tax-payers.

**Oahu General Plans propose all Oahu as a TOD. Everything based on Hong Kong land development and leaving Oahu as an unsustainable wasteland of corruption, desalinated water and bad environmental "planning." No concept of sustainable limits – just MORE.**

Beaches and parks already overcrowded. Ground water within 2 feet of the surface. Cesspools leaking everywhere into shoreline swimming areas. And the Rail Mafia has massive expansion plans with high rises everywhere for rich, which is why the rail is being built - to sell overdeveloped lands to mostly rich Asians and other foreigners.

The age of 19th Century heavy SWSR is long over. The 21st Century is coming very fast with Smart electric vehicles. H-1 will see new virtual lane space created. This is the near future. The new views on this Tony Seba presentation are 1000 a day: [https://www.youtube.com/watch?v=Kxryv2XrnqM](https://www.youtube.com/watch?v=Kxryv2XrnqM)

Already everywhere the public is growing increasingly upset about losing EVERYTHING that made Oahu a great place to live. The City and HART want overcrowded parks and beaches, knowing cesspools are leaking into the 2 foot ground water as the ocean creeps inland.
COUNT 19- City Lied In Farmland Protection Form To Avoid Section 4f Farmland Mitigation – Falsified Federal Document

Rail is a land development scheme and to build rail and cover farmland in asphalt and concrete Parsons Brinkerhoff rail contractor in 2008 falsified Federal document - NRCS-CPA-106

Rail is a land development scheme. Look at the three stations and TOD's in West Oahu- all being built on farmland. The best farmland on Oahu is being totally destroyed and paved over by rail induced land development. This was well documented best farmland on Oahu by all State of Hawaii agricultural maps and agriculture experts. Historically this farmland was Ewa Plantation, the most prosperous sugar plantation in the Hawaiian Islands that existed for over 100 years.

Kioni Dudley, Friends of Makakilo, Save Oahu Farmlands, has brought up the issue to FTA of the “Farmland Conversion Impact Rating” (NRCS-CPA-106) done by rail contractor Parsons Brinkerhoff and how false and fraudulent it appears based upon all the evidence. The most disturbing and KEY POINT is that tax-payer funded research for a Federal transportation project was FALSELY MISREPRESENTED in order to proceed with construction without Section 4f mitigation as required by law.

WEST OAHU CALIFORNIA SPRAWL WITH “Ho’opili AESTHETIC COLUMN” AS “Mitigation.”

There is much more to the Hoopili Farmland Rail Corridor Lie but here is one example going back to 2008 in order to get the FTA ROD and FFGA- $1.5 Billion, The NRCS CPA-106 form as filled out by FTA – City rail contractor Parsons Brinkerhoff for the NRCS (USDA National Resource Conservation Service.) NRCS says that form CPA 106 must be used for corridor
projects like rail. Part IV of the form says that 78 acres are Prime and Unique farmland. In part V it rates the land farmland value as 93 out of 100! (That is NRCS, not the FTA City rail contractor.)

Ho`opili Aesthetic Column

- Embossed columns are designed to reflect richness of the history and culture of the ahupua`a along the rail route
- The Ho`opili embossed columns depict coral representing foundation, sea salt beds, and the first planting of the `ulu tree that grew in this area
- This is one of eight embossed columns that will support guideway for the Ho`opili station in East Kapolei

Then where FTA City PB contractor comes in part VI, the farmland is rated as incredibly LOW FARMLAND VALUE!

This total of outright lies by FTA City- Parsons Brinkerhoff then arrives at 27 so that the Total Farmland Value Score is: 120! If there was a rating of 160 or higher would trigger a protection alternative. However the rail agenda was controlled by powerful politicians who required lie after

Big lie in the Final EIS document to get the FTA money and start construction.

Other farmland experts have shown clearly that this was a major falsification. Because of this single falsified rating the FTA City rail project approved destroying the best farmland on Oahu and paving it over with crushed coral and asphalt for Transit Oriented Development.
Note the CPA 106 justification for this is that the property is "slated for development." However at that time in 2008 there had been no final land use decisions enacted or court cases decided.

Dr. Kioni Dudley did an excellent job showing what a total fraud was committed by the consulting engineers - Parsons Brinkerhoff when they rated this farmland as low quality, below average- so as not to trigger any Section 4f mitigations.

The rail project is loaded with outright lies and misrepresentations, particularly in West Oahu- all to benefit land developers who mitigate NOTHING. It's all a big LAND con.

$500 Million a mile to take less than 2% of the cars off the H-1 and by 2020-25 Smart self-driving electric vehicles will be freeing up lane space and creating virtual hot lanes. Keep in mind the MINIMUM the HART rail expects to have a working rail system "as planned" is Dec 2025 and most likely after $20 billion spent it will "maybe" be 2028-29.

With prices escalated by the Jones Act requirements, and the nation’s fifth worst unfunded pension liability according to The Economist [8], the future is worrisome: At best Honolulu will experience large increases in taxes and congestion, at worst those plus bankruptcy. This textbook megaproject failure orchestrated by business interests and unions, supported by misguided environmentalism got Honolulu railroaded in the worst possible way.

**Count 20- Misuse of Public Infrastructure Funds: Honolulu has a $5 Billion consent decree with the EPA for secondary sewer treatment**

Honolulu has a $5 B consent decree with the EPA for secondary sewer treatment and will almost certainly LOOSE the Sand Island Waste Water Treatment Plant in the next big tsunami or hurricane storm surge. Much of Honolulu will be unable to flush toilets in any of the downtown offices and fancy expensive condos. The rich, famous and tourists will all head for the crumbling third world airport to get away from Honolulu. This before rising ground water floods cesspools in urban Honolulu making local beaches places for catching viral diseases. Great “urban planning” by the mayor and DPP.

**War, Tsunami, Hurricane, Sea level Rise: Honolulu Has Massive Liabilities and No Major Disaster Contingency Plan. FEMA Disaster funds running out Puts Honolulu in Financial Hole**

HART has no required flood variance for the 10 mile WOFH section On Mon, Oct 17, 2016 at 9:38 PM, Natalie aka Bike Mom <the-green-one@hawaii.rr.com> wrote: During today’s meeting, Art Challacombe asked why there is no flood variance for the WOFH contract. He mentioned that the FEMA flood maps have been out for a while, and a flood variance is required from DPP.
Honolulu rail leaders approved $8.3 million in leftover change orders Thursday — cost increases related to delays and premature starts that hit the project’s first 10 miles.

Part of that amount will also help cover the design revisions needed after rail officials decided to include overhead canopies at the future rail stations that resembled Polynesian sails. The move was aimed to save costs, but officials later realized that in heavy wind the canopies would act like actual sails — and they would create heavier loads than the stations were designed to handle. HART has also already purchased millions in rail station artwork without a single station yet constructed. Who will be looking at it? Will there be 24/7 security guards?

“There are similar unresolved issues for the airport guideway. This is absurd, that we’re still facing these kinds of issues.” Hanabusa said Thursday. Hanabusa later left to run for office.

HART’s board plans to announce its interim executive director at its next meeting, Oct. 27. Board members selected him from five candidates, acting Executive Director Mike Formby said. Formby then later resigned his City DTS director position “to seek new opportunities.”


COUNT 21 – City HART Intentionally Avoiding Federal DOT Advisorys Rail and City are Ignoring DOT “Best Practices,” Federal Climate Change Guidelines, “Lessons from Hurricanes Katrina and Sandy,” putting Billions of Infrastructure built with Federal DOT-FTA funds In Disaster Zone Jeopardy

Improved Federal Coordination Should Facilitate Use of Forward-Looking Climate Information in Design Standards, Building Codes, and Certification – US General Accountability Office

https://www.gao.gov/products/GAO-17-3

The houses we live in, buildings we work in, and roads and bridges we use daily are supposed to be built to last—whatever the local forecast has in store. Design standards and building codes generally use historical climate observations. Forward-looking climate information would help account for the changing frequency and intensity of extreme weather. – US GAO
Continuing to build with current standards and codes could cost the government billions of dollars in repairs, flood insurance, and disaster relief. We recommend that federal agencies work together to provide forward-looking climate information for consideration in standards and codes. – US General Accountability Office

A National System Could Help Federal, State, Local, and Private Sector Decision Makers Use Climate Information – US General Accountability Office


Many federal efforts are under way, but the climate information needs of federal, state, local, and private sector decision makers are not being fully met, according to recent GAO reports, National Academies and other studies, and interviews with stakeholders. The November 2013 Executive Order 13653 on Preparing the United States for the Impacts of Climate Change calls on federal agencies to work together to provide authoritative information on climate preparedness and resilience. GAO's February 2015 High-Risk update found that federal, state, local, and private sector decision makers may be “unaware” that climate information exists.

http://www.gao.gov/key_issues/climate_change_response/issue_summary

Problems with Hurricane Sandy Transit Grant Selection Process Highlight the Need for Additional Accountability – US General Accountability Office

https://www.gao.gov/products/GAO-17-20

In October 2012, Hurricane Sandy hit the Mid-Atlantic coast causing severe damage to transit systems in the New York City region. In response, the Disaster Relief Appropriations Act of 2013 provided approximately $10.9 billion for FTA's response, recovery, and resilience efforts. In December 2013, FTA announced discretionary grants to be awarded on a competitive basis for projects to increase the resilience of transit systems to withstand future disasters in the Sandy-affected areas. In November 2014, FTA announced 40 projects selected to receive about $3.6 billion.

HONOLULU IN EXTREME TSUNAMI EVACUATION ZONE – RAIL, TODS IN DANGER

Honolulu Vertical Tsunami Evacuation - Evacuate to the FOURTH floor or above in a reinforced concrete or structural steel building of TEN stories or more. All others, evacuate inland to higher ground.

Go To Higher Ground - If you are near the shoreline and feel an earthquake, immediately head to higher ground outside of the evacuation zone. (On a rail guideway HOW do you evacuate traveling ALONG a corridor that will all be subjected to a coastal tsunami? Especially if the electricity is knocked out?)
The evacuation zone is a guideline and should be considered the minimum safe evacuation distance

Evacuation Advice - Remember:
Remain at least 100 feet away from inland waterways and marinas connected to the ocean due to wave surges and possible flooding

These maps do not consider the destructive effects of a locally generated tsunami. If you feel shaking, move inland immediately, well away from the evacuation zone.

For additional reference information and routing maps please check out the maps at:

University of Hawaii Sea Grant Tsunami Project Website

As sea level rises, much of Honolulu and Waikiki vulnerable to groundwater inundation

https://www.youtube.com/watch?v=UnPKsgTKQx8

The current Federal admin appears to believe that Climate Change is not caused by human activity, however most do appear to believe that Climate Change is real. Almost certainly, among those opinions, almost all would likely agree that hurricane storm surge and tsunamis are real and not connected with human activity.

Rail Mafia EB-5 TOD Land Selloff Scheme

Nearly everyone now sees that TOD is a Rail Mafia scheme to benefit big land developers and not the Oahu tax payers having their taxes and fees jacked up.

According to the recent Civil Beat article By Stewart Yerton, May 5, 2017, the developer Jay Fang is using a federal cash-for-green card investment EB-5 program designed for economically distressed areas to finance a TOD condominium project near Ala Moana Center.
At a time when Hawaii is facing a housing shortage, it does not make sense to support a transit-oriented development project that would be aimed at people from outside of Hawaii. Jay Fang told council members that he did not plan to use union labor to build the tower and said 60 units have been sold to people in China. At least he was being honest!

A fine bit of gerrymandering

http://www.ilind.net/2017/05/06/a-fine-bit-of-gerrymandering/

ILind: …But, it seems, DBEDT took it as a challenge. How they could take a proposed project in an area with extremely low unemployment, and in a city with unemployment well under 3%, and make it appear to to be in an area with an unemployment rate of at least 150 percent of the U.S. national average, thereby qualifying for the especially lucrative benefits of the EB-5 program?

Those tricky folks at DBEDT finally found a way to make it come out right!

They carved out that strange, lizard-shaped district encompassing the large, high unemployment districts on the west side of the island, and sweeping down to small, affluent census tracts over by Ala Moana, where developer Fang hopes to build his project. Average out the unemployment rates across those diverse census tracts, and DBEDT could certify the newly created district as a “Targeted Employment Area for the purposes of the EB-5 program.”

But, it seems, DBEDT took it as a challenge. How they could take a proposed project in an area with extremely low unemployment, and in a city with unemployment well under 3%, and make it appear to to be in an area with an unemployment rate of at least 150 percent of the U.S. national average, thereby qualifying for the especially lucrative benefits of the EB-5 program?

Those tricky folks at DBEDT finally found a way to make it come out right!

They carved out that strange, lizard-shaped district encompassing the large, high unemployment districts on the west side of the island, and sweeping down to small, affluent census tracts over by Ala Moana, where developer Fang hopes to build his project. Average out the unemployment rates across those diverse census tracts, and DBEDT could certify the
newly created district as a “Targeted Employment Area for the purposes of the EB-5 program.”

Developer Zhe Fang has made at least one very smart decision- his project is generally outside of the projected ocean run up of a major Pacific tsunami that is long overdue, as well as a major Pacific hurricane storm surge and projected Sea Level Rise. The City Council plays dumb about these scientific facts. The HART Rail totally lied about this in the Final EIS.

All of the Rail Transit Oriented Development of the final Oahu south shore segment are suckering land developers and businesses into a well identified disaster area, as shown in FEMA, NOAA, UH-SOSEST and City DEM maps. Obviously the City doesn’t care that they and the City DPP are conning foreign land developers into a widely science predicted disaster area. It will result in massive lawsuits after the disaster happens – but of course these will all be paid by the Oahu tax-payers.

So why should this misfeasance and malfeasance even matter to the City? Obviously they have shown they don’t care how many billions in infrastructure will be lost and how many innocent victims may die.

Maybe condo developer Jay Fang should know however, that when the big disaster event happens as predicted, his tenants and investors will not have electric power, running water and will not be able to flush their toilets because the Sand Island Waste Water Treatment Plant will be destroyed and have to be rebuilt someplace away from the Oahu shoreline. But why should the City care? It’s just tax payer money. Obviously no fiduciary responsibility by the City.


“We are willing to complete the Light Rail Project at a price representing 50% of the construction engineering price of the trade union and have it access to ALA MOANA within three years in the future if anyone thinks our calculation is wrong. Moreover, our company will be responsible for the control over the cost of construction engineering of the Light Rail Project and the management of its schedule for free.”
Mr. Fang isn’t the only one using the EB-5 Green Card SCAM. Making headlines currently is Kushner family cashing in on the EB-5 program.


Among the wealthy elites in China, family, business and politics are all deeply intertwined. Every branch of the Communist Party, every province and city often operate as a fiefdom for those in power, allowing leaders special, lucrative access to policy, land and government contracts. There is even a name for second-generation sons and daughters of wealthy business executives and government officials — such as Ivanka Trump and Jared Kushner — who have access to power through family ties. They are called “fuerdai.”

“It’s incredibly stupid and highly inappropriate,” said Richard Painter, the former chief White House ethics lawyer in President George W. Bush’s administration, who has become a vocal critic of the Trump administration.

“They clearly imply that the Kushners are going to make sure you get your visa. . . . They’re [Chinese applicants] not going to take a chance. Of course they’re going to want to invest.”

Reporters barred from China event seeking investment in Kushner project

http://www.reuters.com/article/us-china-kushner-idUSKBN1830E7?il=0

The developers are seeking to raise $150 million, or 15.4 percent of funding for the project, from investors through the EB-5 visa program, according to marketing materials posted by the event's organizer, immigration agency Qiaowai.

The controversial EB-5 program allows wealthy foreigners to, in effect, buy U.S. immigration visas for themselves and families by investing at least $500,000 in certain development projects.

Kushner family pitches wealthy Chinese on ‘investor visas’

Representatives from the Kushner family business are encouraging wealthy Chinese citizens to “invest $500,000 and immigrate to the United States."

The program has been extremely popular among rich Chinese, who call it the “golden visa” and are eager to get their families — and their wealth — out of the country. The fact that some use it to move their money out illegally, however, has made the program unpopular with the Chinese authorities.

The program was launched with the goal of securing investment and creating jobs. But instead, in recent years, many real estate developers have used the program as a source of cheap financing by using foreign investors, especially from China, for flashy projects in Manhattan and other city centers.

A Government Accountability Office report in 2015 found the EB-5 program carried a high risk of fraud, was rife with counterfeit documentation and had “no reliable method to verify the source of the funds of petitioners.”

Chinese Communist Party land investment in West Oahu expects to use Rail land development as a sales tool to sell subdivisions, condos, resort development. Oahu tax-payers are paying for these profits. US federal FTA commuter rail money used to fund the land development. It's a HUGE TOD SCAM and will drive out lower income residents and native Hawaiians from their Leeward Oahu homes. Why should the City DPP care?

**West Oahu Land TOD Buyers:** China Oceanwide Holdings Group founded in 1985 by Lu Zhiqiang, legal representative, Communist Party secretary, and chairman, member of the standing committee of the 12th Chinese People’s Political Consultative Conference, vice president of the China Non-governmental Chamber of Commerce, deputy chairman of the Oceanwide Foundation, deputy chairman of the China Minsheng Banking, etc.

This is EXACTLY what is happening at Hoopili - The Caldwell Rail TOD scheme is building a tax-payer funded rail station on empty farmland for DR Horton Hoopili to sell a California suburban real estate project over a 20 year period. The sacred Rail budget even includes expensive artwork already purchased for three rail stations next to each other on currently
empty but highly valuable Ewa farmland. *The Hoopili EIS even says only a few hundred will even use the station!*

Used mostly as a visual "amenity" to sell real estate for DR Horton, like a swimming pool or entrance way fountain, the rail station is to appear in their sales brochures and videos - all paid by US and Oahu tax-payers!

Hawaiians, Filipinos and those in the youngest age group ALL are the MOST OPPOSED to ANY rail tax increase according to the Honolulu Advertiser poll. West Oahu sees their City Council becoming bought off stooges for HART rail profiteers.

*Ewa Leeward where rail has already been constructed and where rail is supposed to "benefit" them has come out the most AGAINST any rail tax increase (78% against.) This clearly shows the endless rail lies are no longer working and clearly makes the case that Ewa Leeward needs a City Council in touch with the community and not big Rail Mafia cash.*

As an ethnic group Filipinos as the largest group against the rail tax- 72%. They are also the highest percentage - 33% saying "stop construction immediately." Rail construction has largely destroyed the once beautiful historic community of Waipahu.

**Inside the world of China’s ultra rich**


Chinese Scions’ Song: My Daddy’s Rich and My Lamborghini’s Good-Looking


Many residents say the flood of Chinese capital has caused an affordable housing crisis. Vancouver is the most expensive city in Canada to buy a home, according to a 2016 survey by the consulting firm Demographia.

Honolulu is seeing the same trend and the City and State beaches and parks will be overwhelmed - as if they aren't already.

Race and real estate: how hot Chinese money is making Vancouver unlivable


A single family house in Vancouver increased an incredible 30%, to an average of $1.4m. It’s just the latest, dramatic jump in an already dramatic long-term trend that has turned the beautiful Canadian city into one of the world’s least affordable. It’s happening all around Oahu right now,

World Population Explosion – Global Resource Money Agendas

Another of the great problems we will face in the next fifty years is world population explosion and mass starvation. There is a stunning article in the August 2016 National Geographic which says that there will be mass starvation in the world over the next few decades, but climate change will not be the primary cause. Population growth will, by far, be a greater and surer cause. When I was born, there were 2 billion people in the world.

Now there are 7 billion. Population has doubled, and doubled again in the last four decades. The article states, “The world needs to increase food production by 60% to feed more than nine billion people by mid-century.” More food production, however, takes more ground water. The terrible truth is that providing sufficient water for farms to feed the rapidly growing population of the world over the last four decades has already decimated world aquifers. As the article says, “NASA satellites have found that 22 of the world’s 37 largest aquifers have passed the sustainable tipping point.” “In the U.S., because of increased farming, the Ogallala Aquifer which runs under the central bread basket from North Dakota to Texas, dropped another foot last year alone.” Many farmers in its shallower areas have already completely run out of water, which will never be restored. This shrinking of aquifers across the world is happening at the same time that exploding population is demanding more water for greater food production. The only possible result will be ever greater shortage of food, and then starvation. On March 11, 2017, the UN humanitarian chief stated: “Already we are facing the largest humanitarian crisis since the creation of the United
Nations. More than 20 million people across four countries now face starvation and famine.” Massive world starvation and famine will hit by mid-century.

**Local Food Security and Sustainability**

Today Hawaii imports 90% of what we eat. By mid-century, there will be *no outside food from elsewhere*. We must prepare for this fact or we will die.

To grow all of our own food, we would need to quadruple the amount of food we currently grow for the local market. Instead, we are going the other way. Our government blithely moves along, claiming it will double food production by 2020 while turning over 45% of the Oahu farmland that is currently producing food to developers for expensive housing our people can’t afford.

The 1,225 acres of Hoopili are the last piece of warm, sun-filled farmland on Oahu. Experience in recent years has established that crops that need the full-sun of Hoopili fail in the rainier, higher levels. Many of these are very basic foods in our diet. If we expect to provide the full spectrum of basic foods for the million people of Oahu, we cannot afford to lose the warm, full-sun farmland of Hoopili.

We must begin *now* to farm all of the fertile agricultural lands that fallow across the state, not only to provide food for ourselves, but for export to a starving world.

**Island Carrying Capacity**

We have far surpassed the carrying capacity of this island. Opening the island to further development, even just the entire development that is already zoned, will bring disaster upon our people.

We have reached our carrying capacity in traffic. People on the West side of the H-1/H-2 merge spend 3 to 5 hours in traffic every day. Yet we have 70,000 more houses zoned in Central and West Oahu alone. With the City predicting that an average of one resident from each house will commute to work in downtown Honolulu that means 70,000 more people will need to commute into the city. But the freeway can be widened only enough to accommodate 12,000 people, and the rail, with every car packed full, can only accommodate 28,000. This will leave 30,000 workers without a way to work. With only the houses currently zoned, the time to get to and from work will double.
Tourism has also maxed out. Our country roads, our beach parks, our beaches themselves are so crowded that our own people are deprived of normal lives.

We have also exceeded our carrying capacity for fresh water. Before the last of the houses now zoned is built, we will run out of fresh water. The Board of Water Supply is asking for comments on an Environmental Impact Study to resurrect the desalination plant built a couple of decades ago in Campbell Industrial Park. *The plan is to furnish desalinated water to Campbell Industrial Park first. But then the people of West Oahu are next.*

If we move ahead with desalination, we open the way for more development. If we hold the line and insist on fresh water only, we have a reason to stop further development.

In America, it is almost impossible to stop people from moving into a place. The Constitution guarantees them the right. However, when an area can establish that it really cannot take more in-migration, they can put a halt. This was done in Santa Barbara some years back when they stopped issuing water meters because they could not supply future water.

Twenty-five percent of our new homes are purchased by *malihini*, newcomers to the islands. Additional newcomers purchase used homes.

*If our low-lying coastal areas will all too soon become swamps which will need to be cleared, and if in-migration is driving the push that is putting more buildings in those areas, clearly we need to get a grip on in-migration.*

**OAHU GENERAL PLAN 2035 – Rare Endangered Species Habitat Being Destroyed**

The Honolulu Rail Project executed an Environmental Impact Statement (EIS) that required the project to provide for Habitat Conservation Plans (HCP) when any specie so listed on the State of Hawaii or Federal Endangered Species List is/was present on the property/properties-

See *Honolulu Authority For Rapid Transportation* (HART) website to review documents: [http://www.honolulutransit.org/](http://www.honolulutransit.org/)
Before the golf courses were constructed on the Ewa Plain that re-routed many waterways and their outlets, the Honouliuli Ahupua'a ([http://health.hawaii.gov/cwb/files/2013/05/Watershed-Plan.pdf](http://health.hawaii.gov/cwb/files/2013/05/Watershed-Plan.pdf)) featured a vast area defined as Inner Coastal Wetlands - which contained the convergence of two streams- the Honouliuli Stream and Kaloi Stream. Waterfowl were abundant.

*Today, remnants of the inner coastal wetlands exist and there, one can witness numerous endangered species vying for protection- protection in the form of a blade of grass, a puddle of water to call their own.*

The Hawaiian Coot ([https://www.fws.gov/pacificislands/fauna/HIcoot.html](https://www.fws.gov/pacificislands/fauna/HIcoot.html)) is one such endangered specie that government officials knew was there on this property all along- and "in the way" of the development.

So what actions have the US Fish and Wildlife Service (USFWS) taken to ensure the environmental protection laws for endangered species remaining on these inner coastal wetlands are adhered to and followed? Answer is- they at USFWS are either bought off, dishonest, or just plain incompetent for the Coot is there- the Hawaiian Duck, is there, the Stilt, is there, the Pueo, is there and many, many more species in peril being ignored by the USFWS.

*The rail station (where these endangered birds are still present) is being constructed in part with the use of federal grant monies- and in the contract, the federal government states it will not fund any project that destroys endangered species and their habitat without executing first, an Incidental Take Permit (ITP), and executing a HCP.*

John Bond, President
Kanehili Cultural Hui
HART Rail PA Consulting Party
Ewa, Oahu
From: Lyle Campbell  
Sent: Sunday, May 07, 2017 3:18 PM  
To: General Plan 2035  
Subject: Objections to Proposed "Economic Policy 10" in General Plan

As a resident of Kailua, I write to object strongly to the Policy 10 attempt to open the door to ILLEGAL BnBs.

It is very important to enforce, effectively, the laws and statutes regarding these illegal BnBs. I am frustrated, distressed, and, yes, often angry, that in my neighborhood a great many (sometimes it seems like most) houses are involved in illegal BnBs. A large number of these are separate structures, and many are operated by landlords who live off-island. It is just wrong that because they are illegal, no tax revenue comes from them, and it is extremely frustrating that because of these BnBs, long-term rentals hardly exist any more in this neighborhood -- I leave unmentioned the increased noise, traffic, trash, and general confusion that stem from having so many short-term vacation renters in our neighborhood.

Please do something to curb these illegal BnBs.

Many thanks,
Lyle Campbell

Lyle Campbell  
Professor of Linguistics,  
University of Hawai‘i Mānoa
Congratulations on a much improved proposed general plan. This is obviously the result of a lot of work and thought.

My general comments first. It would be good if the major mistakes made in developing Kapolai could be eliminated in future developments. All housing should be within walking distance to neighborhood stores and walkways provided. Cul-de-sacs should be eliminated in subdivision street design.

Bigger picture development along the rail corridor: The housing should be built vertically as moderate high rise with shopping incorporated into the lower levels. Land that would have been used for suburban sprawl could then be used for agriculture and parks. I suggest that 2 times the building footprint be the minimum park space.

Specific comments by document sections:

ECONOMY
.90 Policy 7 Requires transportation improvement as support.
.95 B & B licensing is needed
.99-104 Keep ag land strips along rail view plane

Housing & Communities
160. Policy 3 High rise along rail not suburban sprawl
165. Policy 7 Adjust building codes to encourage boarding houses

Transportation & Utilities
202. Restore this policy
205. Policy 7 This includes eliminating cul-de-sacs in developments

Energy
256. Policy 1 This should include elevating solar farms to allow commercial use of the land beneath them. Multi use of space.

VII Public Safety
344.1 Change Laws to reduce incarceration rates for non violent crimes and reduce prison population.

X Culture and Recreation
Provide suitable space for organized motor sports.

Respectfully Submitted by,

Dan Carpenter
Waianae, Hawaii 96792
Policy 10: Effectively enforce the current ban vacation rentals and bed & breakfasts in residential neighborhoods to allow Hawaii's RESIDENTS and their keiki to live among RESIDENTS in a RESIDENTIAL neighborhoods. Also to be able to one day purchase a RESIDENTIAL home for non inflated(BUISINESS) prices and continue living in Our Home(not business) we call Hawaii.

Please address the issue of vacation rentals from the point of view of a sustainable future for the residents of Hawaii.

Affordability:
Many homes that are purchased now are purchased by a business or people with the intent of using the home as a business rather than a home. This artificially drives up the prices of residential homes, and residents of Hawaii are not able to compete with those prices. With the increase of prices where will families live? Rent?
The same Vacation Rentals that are increasing purchase prices, decreasing the supply of Residential homes, and decreasing the supply of long term rentals. These type of rentals will not rent long term to these families. These are your constituents not the businesses.

At the rate that prices are going up, think about how the keiki of Hawaii will purchase a home? The vacation rentals serve a small percent of people while creating a financial burden on the others. Where I live the it is not uncommon for homes to sell for $850K-$950K and by no means is this a wealthy neighborhood. This means a new Residential Buyer with a normal loan would put 20% down ($170K - $190K). How is that possible for normal working person or couple in Hawaii.

Family:
Being born and raised in Hawaii, I would like my keiki to grow up in a community that I have and probably you have. That of a safe environment and knowing your neighbors.

Sustainability:
Vacation Rentals are not sustainable. If residential properties can be used as Vacation Rentals shouldn't everyone do this? Including your neighbors? This would create Hawaii as one big Waikiki, turning communities into businesses. Then what about those people who just want to live in Hawaii as a family, as a community as it should be.

Please think about Vacation Rentals and its long term consequence for those Residents of Hawaii who would like to live in a family community. Though some people are willing to put money before community we still need a place where community comes before money.

Thank you.
My name is DeMONT R. D. Conner, Co-Manager of Ho`omana Pono, LLC. We are a native Hawaiian Advocacy Corporation that operates out of the Wai`anae Coast.

While we appreciate the due consideration to include Makaha as a designated "Resort" area:

Policy 7
Facilitate the development of the following secondary resort areas: Ko ‘Olina Resort, Turtle Bay Resort, Hoakalei Resort at Ocean Pointe, Mākaha Valley, and Lā‘ie.

We respectfully request the removal of Makaha Valley from any further consideration, especially in light of the lack of opportunity for input by our community, as well as the total deficiency of infrastructure to accommodate a resort.

Mahalo,

De MONT R. D. Conner, Co-Manager
Ho`omana Pono, LLC
Wai`anae, HI 96792
We are a native Hawaiian Advocacy Corporation that operates out of the Westside. We say: NO VACATION RENTALS!

Please ensure that the voice of native Hawaiians is recognized & heard.

Mahalo,

De MONT R. D. Conner
Co-Manager
Ho`omanu Pono, LLC
From: kc connors  
Sent: Monday, May 08, 2017 6:27 PM  
To: General Plan 2035  
Subject: Oahu General Plan - Concerns & Correction Request

Aloha HHF Planners,

Thank you for looking into Concerns & Corrections for the Revised Oahu General Plan and for Keeping the Country, Country.

Some of my Concerns & Correction Requests include:

*NO TVUs (Illegal Vacation Rentals) should be allowed in Oahu !
*NO TVUs in residential nor TOD areas.
*NO small-scale community-oriented visitor accommodations in non-resort areas.
The rapid growth in TVUs are pushing Local Families out of their rental homes and into Homelessness ! Homelessness is ballooning in Oahu, and we have a growing population of Working Homeless- especially in the Country, where TVU have grown exponentially !

*NO changes in the Urban Boundary into the Country. Ko'olau Loa, NorthShore & Kahalu'u/Ko'olaupoko need to all remain COUNTRY, AG & residential !

*NO Resort zoning in Laie. Omit Resort zoning in Laie, especially on the Ocean side.

*Population Growth Statistics needs to be a part of any serious Planning & the OGP: Food, Water, Transportation, Housing & Services all hinge on population.

* Food Safety, Agricultural Food Self-sufficiency and Population planning are a must for the OGP. Currently Hawaii imports over 90% of it food.

*Water is so important-we are an island, Water needs to be a separate Section. Fresh, sustainable water for the local population needs to be a key component to Planning.

*Carrying Capacity projections for Oahu need to be added

*Carrying Capacity for the scenic 2 lane, Kamehameha Hwy from Kahalu'u-Ko'olau Loa-North Shore needs to be taken into consideration- the road is already at capacity ! Therefore NO additional Housing/Commercial Developments should be allowed in Kahalu'u-Ko'olau Loa-North Shore.

*NO greater density developments should be allowed around Bus Stops in the Country: Ko'olauLoa, Kahualu'u & North Shore.

*Importance for Oahu's Tourist Industry of *Keeping the Country, Country* in Ko'olauLoa, Kahualu'u & North Shore needs to be fully understood & added. More then 3.5million tourist visit our scenic Country area- and its often the high-light of their trip.
*Importance for Hawaii’s Film Industry of *Keeping the Country, Country* in Ko'olauLoa, Kahualu'u & North Shore needs be incorporated into OGP. Hollywood films very extensively in the scenic mountains, valleys and coast of the Country. The Film Industry provides many modern, higher-income Jobs, and is a way to diversify Hawaii’s economy with more 21st Century Jobs that fit the gifts & talents of our Local Communities. OGP needs to look at the needs of the important Film/TV Industry.

Thank you for again revising the OGP to preserve the Country as an essential part of Hawaii’s Economy and Modern Economic Planning. Thank you for your consideration.

Sincerely,
KC Connors
Hau'ula, HI

"*God is with you wherever you go.*" Joshua 1:9 (esp in beautiful Ko'olau Loa:-)
I would like to comment that the DPP, State and C&C needs to do a better job of limiting growth. Right now the cry is BUILD, BUILD. Please set strict density standards. Where will our water come from? Where will our food come from? Will tourists who are our major source of income (besides military) stop coming because of a disease like Zika? Will they stop coming if this island is concrete? Will they go to other places that embrace B&B’s because they don’t like staying in hotels? Will the DPP ever crack down on people subdividing their houses? What will we do with the homeless population? We need to get the homeless off the streets but at the same time ensure we don’t encourage more from the mainland.

Lois Crozer

Kailua
Change the wording Under ECONOMY, Objective B, Policy 10 to read, "Effectively enforce the current ban on vacation rentals and bed & breakfasts in residential neighborhoods to bring down rental and housing prices for O'ahu's residents."

The current wording allows even more “... small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively." To date DPP has been unable to "enforce effectively" the existing ban on the more than 8,000 illegal vacation rentals on O'ahu. To enforce effectively, all advertisements for these rentals should carry a TAT or a registration number. Such a number would allow DPP to identify illegal rentals and put them out of business while allowing legal ones to continue.
The short term market on North Shore is an important part of NS business. NS has a history of short term rentals and only recently has this business been refined and is in high demand out here. Last year it was responsible for over 50% of the Haleiwa evening restaurant trade and provided lucrative employment for over 400 individuals.

Turtle Bay Hotel and Local 5 are trying to eliminate competition for their own condominiums through their misleading TV ads.

Please pass this so we can begin to legally control the short term market here on NS.

Mike Dixon, Sunset Beach

--
Renting North Shore Beach Houses since 1979.
Comments on the O‘ahu General Plan
Submitted from a Joint Special Meeting attended
By Members of four Neighborhood Boards

1. Introduction:

On Thursday, May 5, 2017, the Makakilo-Kapolei-Honokai Hale NB (which had a quorum), and members of the Wai‘anae NB, and Pearl City, and Miliiani-Waipio NBs held a joint Special Meeting at Kapolei Hale. They were joined by individuals from the Nanakuli NB and members of the public. In all, twenty people attended the meeting. The Makakilo-Kapolei-Honokai Hale NB, along with all others in attendance, voted to send forth the comments on the O‘ahu General Plan contained in this Sections 1 and the following Section 2 of this statement. The meeting was not adjourned. They reconvened on May 7, 2013, and voted to approve Section 3. (Find a copy of this in the attachment.)

We are gravely concerned because the Second Public Review Draft (February 24, 2017) of Proposed General Plan Revisions addresses only the present situation on O‘ahu. However, the world we know today will soon pass, and the Plan does not at all address the major changes O‘ahu will experience while the plan is in effect. For instance, we are stunned that the Plan speaks of only studying the problem of Sea Level Rise as a future goal, while ignoring the known cataclysmic problems we have been aware of for at least a few years and which will begin arising shortly after the Plan is approved.

We fear that the Plan is written to allow the construction community to continue building as they please for self-enrichment, instead of directing where and what they can build in order to meet the needs of the starkly different world we will face in just a few years.

When the water starts breaking through the ground and our beaches and tourists are gone, we are going to be stuck with the high-rises sitting in the mud. A forward looking O‘ahu General Plan should be mapping inundation zones in low-lying areas around the island, and limiting low rise buildings--and forbidding high rise buildings--in low-lying areas. THIS PLAN should already make the choice between raising the ground in the lowlands, or creating a Venice with buildings reached by boat, or clearing the swamp of buildings as the water rises.

There are other major problems this Plan doesn’t acknowledge. The United Nations warns that by mid-century, the world will not be able to produce enough food to feed the anticipated world-wide population explosion. Hawai‘i imports 90% of the food we eat. There will be no outside food. THIS PLAN should be addressing how we can quadruple our farming in 30 years.

Additional problems are discussed in the material below, like exceeding the island carrying capacity, the need to limit in-migration, and resisting the move to desalinated water.
This plan should also address our huge traffic problem, and the fact that the City wants to build 70,000 more houses in Central and West O’ahu, many of them before the rail is done. This will double our time in traffic, destroy our family life, and take a major toll on us. This plan should protect us by insisting that these houses not be built until there is adequate freeway and rail capacity to accommodate the new commuters to the city.

We ask that you go back and start over, writing a plan that addresses these things.

2. Important Findings Which Inform Our Request:

Our Neighborhood Boards have used the material on the next five pages as the basis for our request. We ask that you read it before proceeding to the section, Some Changes Requested in the Plan.

Population Explosion

One of the great problems we will face in the next fifty years is world population explosion and mass starvation. There is a stunning article in the August 2016 National Geographic which says that there will be mass starvation in the world over the next few decades, but climate change will not be the primary cause. Population growth will, by far, be a greater and surer cause. Just seventy years ago, there were 2 billion people in the world. Now there are 7 billion. Population has doubled, and doubled again in the last four decades. The article states, “The world needs to increase food production by 60% to feed more than nine billion people by mid-century.” More food production, however, takes more ground water. The terrible truth is that providing sufficient water for farms to feed the rapidly growing population of the world over the last four decades has already decimated world aquifers. As the article says, “NASA satellites have found that 22 of the world’s 37 largest aquifers have passed the sustainable tipping point.” “In the U.S., because of increased farming, the Ogallala Aquifer which runs under the central bread basket from North Dakota to Texas, dropped another foot last year alone.” Many farmers in its shallower areas have already completely run out of water, which will never be restored. This shrinking of aquifers across the world is happening at the same time that exploding population is demanding more water for greater food production. The only possible result will be ever greater shortage of food, and then starvation. On March 11, 2017, the UN humanitarian chief stated: “Already we are facing the largest humanitarian crisis since the creation of the United Nations. More than 20 million people across four countries now face starvation and famine.” Massive world starvation and famine will hit by mid-century.

Local Food Security and Sustainability

Today Hawaii imports 90% of what we eat. By mid-century, there will be no outside food available from elsewhere. We must prepare for this fact or we will die.

To grow all of our own food, we would need to quadruple the amount of food we currently grow for the local market. Instead, we are going the other way. Our government blithely moves along, claiming it will double food production by 2020 while turning over 45% of the O’ahu farmland that is currently producing food to developers for expensive housing our people can’t afford.

The 1,225 acres of Ho’opili are the last piece of warm, sun-filled farmland on O’ahu. Experience in recent years has established that crops that need the full-sun of Ho’opili fail in the rainier, higher levels. Many of these are very basic foods in our diet. If we expect to provide the full spectrum of basic foods for the million people of O’ahu, we cannot afford to lose the warm, full-sun farmland of Ho’opili.

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We have reached our carrying capacity in traffic. People on the West side of the H-1/H-2 merge spend 3 to 5 hours in traffic every day. Yet we have 70,000 more houses zoned in Central and West O’ahu.
alone. With the City predicting that an average of one resident from each house will commute to work in downtown Honolulu, that means 70,000 more people will need to commute into the city. But the freeway can be widened only enough to accommodate 12,000 people, and the rail, with every car packed full, can only accommodate 28,000. This will leave 30,000 workers without a way to work. No more freeways can be built. With only the houses currently zoned, the time to get to and from work will double. The burden this will place on commuters, their families, their performance at the work place will be unbelievable. We have obviously exceeded our carrying capacity in transportation.

Tourism has also maxed out. Our country roads, our beach parks, our beaches themselves are so crowded that our own people are deprived of normal lives.

We have also exceeded our carrying capacity for fresh water. Before the last of the houses now zoned is built, we will run out of fresh water. The Board of Water Supply is asking for comments on an Environmental Impact Study to resurrect the desalination plant built a couple of decades ago in Campbell Industrial Park. The plan is to furnish desalinated water to Campbell Industrial Park first. But then the people of West Oahu are next.

If we move ahead with desalination, we open the way for more development. If we hold the line and insist on fresh water only, we have a reason to stop further development.

In America, it is almost impossible to stop people from moving into a place. The Constitution guarantees them the right. However, when an area can establish that it really cannot take more in-migration, they can put a halt. This was done in Santa Barbara some years back when they stopped issuing water meters because they could not supply future water.

Twenty-five percent of our new homes are purchased by malihini, newcomers to the islands. Additional newcomers purchase used homes.

If our low-lying coastal areas will all too soon become swamps which will need to be cleared, and if in-migration is driving the push that is putting more buildings in those areas, clearly we need to get a grip on in-migration. It is time to begin doing what can be done.

Traffic and Additional Housing

Traffic on H-1 is frequently rated as the worst in the United States. People on the West side spend between three and five hours a day commuting. Figures released by DPP reveal that 70,000 more homes have been zoned and are expected to be built in Central and West-Oahu by 2035. DPP states in the recently revised ‘Ewa Development Plan (EDP) that in 2030, a majority of residents in Leeward will still commute to jobs outside the region.(p.4-13). This is more than 70,000 additional commuters. H-1 recently added a second zipper lane. The right-of-way will only accommodate one more regular lane. Together, these new lanes could accommodate 12,000 cars. The rail, with every car crammed full, could accommodate only another 28,000. This leaves 30,000 people needing to get to work in the city. As they cram onto the freeway, it will come to gridlock.

Because of time spent commuting, we miss hours we could spend with our families each day, we miss seeing our kids grow up, we don’t have time for exercise and leisure and community activities. This plan could lift away the tension, anger, and frustration our people experience every day now in traffic, improving commuters’ health. And it could give tens of thousands of latchkey kids, left alone for hours before and after school, the experience and guidance of family again.

The ‘Ewa Development Plan promises that “Zoning and other development approvals for new developments should be approved only if the responsible City and State agencies indicate that adequate public facilities and utilities will be available at the time of occupancy or if conditions the functional agency indicates are necessary to assure adequacy are otherwise sufficiently addressed. (p.5-16) It further states that “its transportation system should...Provide adequate capacity for major peak hour commuting to work in the Primary Urban Center.” (EDP 4-13)
Climate Change and Sea Level Rise

Let us finally look at climate change and sea level rise. Below are the latest maps from the U.H. School of Ocean and Earth Science and Technology (SOEST) forecasting sea level rise in the Kaka’ako, Ala Moana, Mo’ili’ili, and Waikiki areas. Similar inundation will take place in all low-lying areas around the islands. Sea level is expected to rise 1 ft. by mid-century, and 3 ft. by 2100. Builders of hospitals, high-rises, and other buildings that are expected to stand for decades are warned to plan for the worst-case scenario, more than a 9 ft. rise by 2100.

Four decades from now we can expect scenes like these.
This is what Kapiolani Blvd at Atchison will look like in mid-century, with no possibility of getting rid of the water.

Above is what Kapiolani Blvd. itself will look like in mid-century.

This is what the Ala Wai Canal and the area around it will look like.

There will be no way to get the water to recede. It will continue to rise over the decades, perhaps by as much as a foot a decade, with no end in sight for hundreds of years.

Every few weeks our city government approves another high-rise in these low-lying areas. As the seas rise over coming decades, the people of O‘ahu will be stuck with hundreds of derelict high-rise apartment buildings and hotels standing deep in the swamp, darkened, empty, and poisoning the water around. Our multi-millionaires will have simply picked up and moved on from a bad investment; our beaches will be gone.
and tourism will be completely dead; our tax base will be decimated; our descendants will be struggling to stay alive; and we won't have the many hundreds of millions of dollars to tear down the abandoned buildings.

We need now to start preparing for the future. We need to take heed of the strong call by UH SOEST experts to move all future development inland. Residential high-rises need to be built in the higher valleys of Nu‘uanu, Manoa, and Kalihi. None should be allowed more than a block or two below the freeway. We must expect King Street to one day become Shoreline Drive.

Those who would build in the low-lying areas must be forced to place enough money in city-held escrow accounts to pay for demolishing the buildings and cleaning the sites when the water begins to come through the surface. And developers must be forced to give notice to buyers that their buildings will have to be demolished as the water rises. The city must insure that purchasers know they buy at their own risk, and that the city cannot be sued.

Decisions need to be made about the whole Kaka‘ako to Diamond Head, and in low-lying areas all around the island, before any more high-rises are built. How will we adapt to the rising seas? Because fresh water will break through the ground as the seas rise, dikes will not solve our problems. Will we bring dirt from the mountains and raise the level of the ground as the years go on? Or will we attempt to turn the area into a Venice with water between the buildings? In either case, we will need to build high-rises so that all operations can move to the second floor in the future. Or, will we tear down all of the buildings and clear the ground as the water rises, so as to have less-polluted water at our shores? If so, we must build low-rise buildings that can be torn down.

3. Comments on Sections of the Plan
In this section, our comments and inserted words are in blue.

Introduction Although future population projections indicate a slower rate of growth in the future due to an aging population, and mature economy, and problems anticipated with rising sea levels, O‘ahu will continue to maintain its prominence as the state’s economic, political, and population center. (the last sentence of the section pp-4-5.)

Preamble 13. . . . A sustainable Honolulu would have the capacity to support the current generation’s demand and use of its resources without compromising the ability of future generations to meet their own needs. To do this, the City and County shall seek to find the appropriate balance and synthesis of the major elements of sustainability that are essential to the creation of a sustainable place:

- Food security
- Fresh natural drinking water
- environmental protection
- economic health, and
- social equity. (p.7)

Content of the General Plan 14. . . . Examples of what sustainability means in practice are:

- compact and mixed-use development patterns that encourage higher densities and conserve energy
- preservation and protection of agricultural, natural, and open space resources
- greater recycling and waste stream reduction, encouraging rain water catchment systems
- use of renewable energy sources to reduce dependence on imported fossil fuels where economically and environmentally appropriate
- greater production and consumption of locally-grown food and locally-produced products,
- economic diversification that emphasizes the well-being of O‘ahu’s residents and is resilient to changes in global conditions, and
- greater awareness that the collective “social capital” within communities is vital to maintaining a strong and productive society
- providing directions for growth that will properly accommodate sea level rise
16. POPULATION  The population objectives and policies encompass two three distinct thrusts.  The first is: First, to control population growth to the extent possible to avoid social, economic, and environmental disruptions.  Second, to plan for anticipated future population growth in a manner that considers the limits of O‘ahu’s natural resources, that protects the environment, and that minimizes social, cultural, economic and environmental disruptions.  The second is And, finally, to maintain a pattern of population distribution that will allow people to live, and work, and play in harmony.  The map at the end of Chapter 1 conceptually shows the development pattern on O‘ahu in relation to Policy 4. The distribution of residential population percentages in Policy 4 and the map are not regulatory, but are guides to population growth in each of the DP and SCP areas  

We vote to keep all of the above.  We strongly disagree with dropping the controlling of population growth.  We have reached the carrying capacity of the island in many areas.

TRANSPORTATION AND UTILITIES  This Transportation section is just sweet-talking waha.  It needs to address the fact that traffic is destroying our lives.  We won’t be able to get to work in the city if we keep building.  It needs to put in the language from the Ewa Development Plan guaranteeing adequate capacity for commuters going to and coming from the Primary Urban Center.

Utilities -- Population growth results in increased demands for water, sewage, and solid waste disposal services provided by government, as well as the communication, electricity, and gas systems provided by the private sector.  Not only must such needs be met, but the social, economic, and environmental consequences of meeting these needs must be carefully considered.  This is where the Plan needs to address carrying capacity and running out of fresh water, and how people of the West side will wind up drinking the desalinated water.

24. PHYSICAL DEVELOPMENT AND URBAN DESIGN
This section needs to give directions that reflect climate change and sea level rise.  Such as no high-rises below the freeway in the city.  And deposits by everyone building in the lowlands to pay for later tearing down.  

The General Plan now also contains an objective on climate change and sea level rise.  It calls for all public and private organizations to prepare for the future problems caused by rises in sea level, rises in groundwater levels, and more frequent and severe storms, shifts in local rainfall patterns, and higher urban temperatures.  The Climate Change Adaptation Priority Guidelines of the Hawai‘i State Planning Act, HRS 226, support planning and preparing for future disruptions and dislocations due to climate change.

CULTURE AND RECREATION
It is good that you are addressing this.  People on the West side have no leisure.  The reason is our commute.  Additionally, many of us work two or three jobs to survive.  This section needs to address how to give our people time for leisure.  If we stopped building on the West side until rail is complete, and added one new lane to the freeway in the meantime, we could bring the freeway back up to LOS D, and get people home 40 minutes to an hour faster.  This Plan could do that.

29. The use of leisure time is addressed through objectives and policies encouraging visual and performing arts and the provision of a wide range of recreational facilities and services that are readily available to all our residents and visitors.  New policies also call for utilizing our unique natural environment in a responsible way to promote cultural events and activities, and for creating and promoting recreational venues for keiki and kupuna and for kama‘āina and malahini.
Affirms Waikīkī as the primary resort area and identifies secondary resort areas. ~ Reshapes policies about Waikīkī's future redevelopment to focus on maximizing the quality of the visitor experience, rather than applying technical growth controls. This section should be focusing on how to save the beaches in the short term, and how to deal with tourism once the water begins breaking through the ground.

Comments from Larry McElheny (North Shore):
Population size is the foundational issue from which all other issues grow. Therefore, it is rightly first and foremost in the current General Plan:

“To control the growth of Oahu’s resident and visitor populations........”
“Publicize the desire of the City and County to limit population growth.....”
“Reduce inmigration.....”
“Control population growth.....”
For an island with finite resources, these policies make perfect sense.

In light of these facts, it is very disturbing that the revised draft does the following:
“Eliminates references to limiting population growth......”
Makes no mention of over-population or carrying capacity.....
Sounds as if we are going to allow unfettered growth......

Please encourage the Department of Planning and Permitting to retain the population policies that appear in the current General Plan and strongly encourage the “powers that be” to comply with those policies.
This Resolution was adopted by four Neighborhood Boards – Makakilo-Kapolei-Honokai Hale, Mililani-Waipio, Wai‘anae, and Pearl City and sent to Department of Planning and Permitting and others named at the end in 2016. It contains much information that is pertinent to the O‘ahu General Plan.

Please include this as comments for the General Plan from these four Neighborhood Boards.

**Makakilo-Kapolei-Honokai Hale Neighborhood Board #34**

Resolution Demanding that, as directed by the ‘Ewa Development Plan, the Honolulu Department of Planning and Permitting Cease Issuing All Future Permits for Construction of Housing developments, Time-shares, and Hotels in Leeward and Central O‘ahu until Rush-Hour Traffic on all segments of H-1 Freeway Can be Certified to be at Level of Service D or Above

WHEREAS, The Makakilo-Kapolei-Honokai Hale Neighborhood Board finds that traffic congestion on the H-1 Freeway has become unbearable, with rush hour every morning, traffic stalled at the H-1/H-2 merge and backed up four and a half miles, and at least once a week, traffic is backed up seven miles to Makakilo Drive, or further, creating a three-hour drive to work in the city from the Leeward Coast; and traffic on H-2 is regularly backed up for a mile or more; and

WHEREAS, the official Inrix Report has repeatedly named H-1 traffic as the first, second, or third worst in the United States; and

WHEREAS, the Board finds that there are 70,000 more housing units zoned in the Leeward and Central area, nearly double the number currently feeding the five lanes of freeway traffic. And the City Department of Planning and Permitting states that more than half of all residents will work outside the area for the foreseeable
future, and that, with an average of two workers per household, that is over 70,000 more people that will be working outside of the area, and

**WHEREAS**, the State Department of Transportation states that it is not physically possible to build more than just one additional lane on the freeway, which lane cannot carry more than 8,800 cars during the whole morning rush hour. And the Rail will not be complete for another three years, and when complete, can carry only 28,800 packed full. And this will leave more than 30,000 commuters without a way to the primary urban center during rush hour. And there is simply no possible solution to the problem of traffic for all of the homes that will be built; and

**WHEREAS**, traffic commute time increases exponentially. That is, only a small addition of cars radically affects the flow, as is seen when UH Manoa is in session. And commute time will double, and triple, and quadruple, and

**WHEREAS**, this will double and triple loss of time with family, loss of time watching kids in sports, loss of time seeing one’s family grow up. It will steal time for exercise, time for participation in community, time for leisure. It will take a toll on personal health and performance at the workplace. And it will leave tens of thousands of latchkey kids of all ages alone and unsupervised for twice the number of hours every day. The costs to our society are staggering, and

**WHEREAS**, tens of thousands of individuals and businesses will face major losses in dollars if the daily commute expands. According to The Texas Transportation Institute model, today’s two hours of delay in traffic cost individuals $7,300 a year. This will double to $14,600. Commercial vehicles delayed in today’s traffic cost businesses $38,500. This will double to $77,000, enough to drive many out of business; and

**WHEREAS**, the Ewa Development Plan contains an Adequate Facilities Requirement on page 5-2 which states: “Zoning *and other development approvals* for new developments should be approved only if the responsible City and State agencies indicate that adequate public facilities and utilities will be available *at the*
time of occupancy or if conditions the functional agency indicates are necessary to assure adequacy are otherwise sufficiently addressed.” Among the “adequate” facilities required before development approvals is “Provide adequate capacity for major peak-hour commuting to work in the Primary Urban Center.” (page 4-11) In Hawaii, and across the nation, Level of Service D is recognized as adequate freeway capacity for rush hour freeway traffic, and

WHEREAS, the Makakilo-Kapolei-Honokai Hale Neighborhood Board finds that the Honolulu Department of Planning and Permitting is in direct non-compliance with the requirements of the ‘Ewa Development Plan, which plan gives direction for the development of the area. And that this Resolution will protect will protect our citizens from further injury to their health, safety, and general welfare; now therefore,

BE IT RESOLVED THAT the Makakilo-Kapolei-Honokai Hale Neighborhood Board demands that the Honolulu Department of Planning and Permitting comply with the ‘Ewa Development Plan by ceasing to issue any future permits for Construction of Housing developments, Time-shares, and Hotels in Leeward and Central O’ahu within an Interim Development Control area (designated in the next paragraph) until Rush-Hour Traffic on all segments of H-1 Freeway Can be Certified to be at Level of Service D or above, and

BE IT FURTHER RESOLVED THAT an Interim Development Control IDC Area is designated as all that area of Central O’ahu north of or above the H-1/H-2 merge, and all of West O’ahu and the Leeward Coast on the western side of the H-1/H-2 merge, and

BE IT FURTHER RESOLVED THAT from the effective date of this meeting, April 27, 2016, until the date that all segments of H-1 freeway have been certified to be at Level of Service D for the entire rush hour period, no further zoning or other development approvals or permits shall be issued within the Interim Development Control area, except as specifically permitted herein, and

BE IT FURTHER RESOLVED THAT the ban on issuance of approvals or permits does not apply to the application for or issuance of approvals or permits in the following instances:

1. Performance of work permitted under Section 18-3.1, Revised Ordinances of
Honolulu, to make an existing building or structure conform to or comply with applicable laws or regulations.

2. Performance of maintenance and repair to an existing structure or building.

3. Construction of a single-family dwelling, ‘ohana dwelling, accessory dwelling unit, or two-family detached dwelling that is not part of a larger development.

4. Construction of housing for the homeless.

And nothing contained in this resolution is to be deemed to affect:

1. The granting, issuance and/or approval of building permits within an area not designated as within the interim development area, and

BE IT FINALLY RESOLVED that copies of this Resolution will be sent to the following: Governor David Ige, Senate President Ronald Kouchi, House Speaker Joe Souki, all State Senators and all State Representatives; State DOT Director, Ford Fuchigami, Mayor Kirk Caldwell, all City Council Members, DTS Chair Michael Formsby, DPP Chair George Atta, OHA Executive Director Kamana’opono Crabbe, and all Neighborhood Board members on the island of O’ahu.

This Resolution was passed by the Makakilo-Kapolei-Honokai Hale Neighborhood Board #34 by a vote of 5 yes and 1 no and 0 abstentions at their regular meeting on April 27, 2016.
Resolution Demanding that, as directed by the ‘Ewa Development Plan, the Honolulu Department of Planning and Permitting Cease Issuing All Future Permits for Construction of Housing developments, Time-shares, and Hotels in Leeward and Central O’ahu until Rush-Hour Traffic on all segments of H-1 Freeway Can be Certified to be at Level of Service D or Above

SECTION 1. Findings and Purpose: The Makakilo-Kapolei-Honokai Hale Neighborhood Board finds that traffic congestion on the H-1 Freeway has become unbearable. During rush hour every morning, traffic is stalled at the H-1/H-2 merge and backed up four and a half miles. At least once a week, traffic is backed up seven miles to Makakilo Drive, or further, creating a four-hour drive to work in the city from the Leeward Coast. Traffic on H-2 is regularly backed up for a mile or more.

The official Inrix Report has repeatedly named H-1 traffic as the first, second, or third worst in the United States.

The Board finds that there are 70,000 more housing units zoned in the Leeward and Central area, nearly double the number currently feeding the five lanes of freeway traffic. The City Department of Planning and Permitting states that more than half of all residents will work outside the area for the foreseeable future. With an average of two workers per household, that is over 70,000 more people that will be working outside of the area. The State Department of Transportation states that it is not physically possible to build more than just one additional lane on the freeway. That one lane should be used to help solve the current traffic back-up. Rail will not be complete for another three years, and when complete, can carry only 9,600 people an hour, about a third of the commuters anticipated. There is simply no possible solution to the problem of traffic for all of the homes that will be built.

Traffic commute time increases exponentially. That is, only a small addition of cars radically affects the flow. This is seen when UH Manoa is in session. Commute time will double, and triple, and quadruple.
This will double and triple loss of time with family, loss of time watching kids in sports, loss of time seeing one’s family grow up. It will steal time for exercise, time for participation in community, time for leisure. It will take a toll on personal health and performance at the workplace. And it will leave tens of thousands of latchkey kids of all ages alone and unsupervised for twice the number of hours every day. The costs to our society are staggering.

Tens of thousands of individuals and businesses will face major losses in dollars if the daily commute expands. According to The Texas Transportation Institute model, today’s two hours of delay in traffic cost individuals $7,300 a year. This will double to $14,600. Commercial vehicles delayed in today’s traffic cost businesses $38,500. This will double to $77,000, enough to drive many out of business.

The Ewa Development Plan contains an Adequate Facilities Requirement on page 5-2 which states: “Zoning and other development approvals for new developments should be approved only if the responsible City and State agencies indicate that adequate public facilities and utilities will be available at the time of occupancy or if conditions the functional agency indicates are necessary to assure adequacy are otherwise sufficiently addressed.” Among the “adequate” facilities required before development approvals is “Provide adequate capacity for major peak-hour commuting to work in the Primary Urban Center.” (page 4-11) In Hawaii, and across the nation, Level of Service D is recognized as adequate freeway capacity for rush hour freeway traffic.

The Makakilo-Kapolei-Honokai Hale Neighborhood Board finds that the Honolulu Department of Planning and Permitting is in direct non-compliance with the requirements of the ‘Ewa Development Plan, which plan gives direction for the development of the area.

This Resolution will protect will protect our citizens from further injury to their health, safety, and general welfare by demanding that the Honolulu Department of Planning and Permitting comply with the ‘Ewa Development Plan by ceasing to issue any future permits for Construction of Housing developments, Time-shares, and Hotels in Leeward and Central O’ahu within the Interim Development Control area designated in
Section 2 until Rush-Hour Traffic on all segments of H-1 Freeway can be certified to be at Level of Service D or above.

SECTION 2. Parameters of the Affected Area: There is hereby established an Interim Development Control IDC Area which is designated as all that area of Central O'ahu north of or above the H-1/H-2 merge, and all of West O'ahu and the Leeward Coast on the western side of the H-1/H-2 merge.

SECTION 3. Applicability.

A. From the effective date of this meeting, April 27, 2016, until the date that all segments of H-1 freeway have been certified to be at Level of Service D for the entire rush hour period, no further zoning or other development approvals or permits shall be issued within the area designated in SECTION 2, except as specifically permitted herein.

B. Section 3.A does not apply to the application for or issuance of approvals or permits in the following instances:

1. Performance of work permitted under Section 18-3.1, Revised Ordinances of Honolulu, to make an existing building or structure conform to or comply with applicable laws or regulations.

2. Performance of maintenance and repair to an existing structure or building.

3. Construction of a single-family dwelling, ‘ohana dwelling, accessory dwelling unit, or two-family detached dwelling that is not part of a larger development.

C. Nothing contained in this ordinance is to be deemed to affect:

1. The granting, issuance and/or approval of building permits within an area not designated as within the interim development area as designated in Section

SECTION 5. Severability.
The invalidity of any word, section, clause, paragraph, sentence, part or portion of this ordinance will not affect the validity of any other part of this ordinance which can be given effect without such invalid part or parts.

SECTION 6. Copies of this Resolution will be sent to the following: Governor David Ige, Senate President Ronald Kouchi, House Speaker Joe Souki, all State Senators and all State Representatives; State DOT Director, Ford Fuchigami, Mayor Kirk Caldwell, all City Council Members, DTS Chair Michael Formsby, DPP Chair George Atta, OHA Executive Director Kamana’opono Crabbe, and all Neighborhood Board members in the Interim Development Control area designated in Section 2.

SECTION 7. This Resolution was passed by the Makakilo-Kapolei-Honokai Hale Neighborhood Board #34 by a vote of 5 yes and 1 no and 0 3 abstentions at their regular meeting on April 27, 2016.
Freeway Commute Traffic Can Be Radically Improved

By Dr. Kioni Dudley

This is a pivotal time in history: we can either dramatically reduce commute time, improving the lives of hundreds of thousands of commuters from the Central and West side of O‘ahu, or we can double it.

We live in Paradise, but our daily commute is Hell. A ride from Kapolei into or out of the city that takes twenty minutes at 10 A.M. takes an hour and a half or more during rush hour, each way, each day. All of our current city plans project that, even with rail, congestion will get far worse. The commute will reach two and a half hours each way, and beyond.

The reason? We have 71,000 additional houses zoned and ready to build in Central and West O‘ahu. While it might be claimed that 64,000 new jobs will be available in the new second city, that won’t be enough to serve even one of the two workers in the average house. All the others are expected to work in Honolulu. That’s means more than 71,000 additional people in rush hour traffic. Anticipated improvements on the freeway will accommodate 12,000 of them, and Rail, with every car crammed full, might accommodate another 28,000. But that leaves more than 30,000 without a way into the city. The result will be unbelievable freeway gridlock.

But that doesn’t have to happen.

With one decisive stand, we can change everything. We can give people back their lives, give them hours more to spend with their families each day, let them see their kids grow up, give them time for exercise and leisure and community activities. We can lift away the tension, anger, and frustration they experience now in traffic. We can improve their health and their performance in the workplace. We can also give latchkey kids, left alone for hours before and after school, the experience and guidance of family again.

An hour of delay each way currently costs families an extra $7,300 a year, a hidden cause of homelessness. If traffic doubles, the $14,600 cost will put far more onto the streets. Businesses currently pay $34,000 for a two-hour delay. Doubling that to $68,000 would shut many down.

How can we change it all? By changing our priorities, and putting the people first instead of the construction industry. The state has just added another zipper lane, and in the next few years will add another freeway lane. If we were to stop adding houses in Leeward and Central O‘ahu just during that time, we could dramatically improve current traffic. Rail, buses, or whatever ultimately rides the elevated guideway, would assuredly bring freeway crawl back up to Level of Service D—crowded, somewhat slowed, but steady moving traffic—which is the “acceptable” rush hour standard nationwide. Building in the area could then resume as long as that standard is maintained.

The ‘Ewa Development Plan, which is the law, actually requires this, but the Mayor, his Departments, and the City Council have ignored it.
The Makakilo-Kapolei-Honokai Hale Neighborhood Board passed a resolution demanding that the City Department of Planning and Permitting comply with the ‘Ewa Development Plan and cease issuing all permits for all housing developments, hotels, and timeshares in Leeward and Central O’ahu until rush hour traffic is restored to Level of Service D (LOS D). The Neighborhood Boards of Mililani-Waipio, Pearl City, and Wai‘anae have passed similar resolutions in support.

This is the time to put the people first. A year from now will be too late. Jobs aren’t a problem. The construction job market is near its highest level ever.

This is also an election year, a perfect time to insist on this. Let’s put traffic into every debate—mayoral, city council, and legislative. Let’s see who will commit to getting commuter traffic back up to, and keeping it at, LOS D.
I strongly object to the inclusion of the following in the proposed General Plan currently under deliberation:

Policy 10
Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively.

This opens the door to permitting what is already illegal and a blight on our neighborhoods: short-term "hotel" accommodations in residential zoned areas.

The language "...as warranted by market demand" is a built-in justification for allowing illegal activity to continue and expand. The majority of "community input" in favor of permitting is voiced by the scofflaws who have been exploiting residential areas—with relative impunity—for financial gain for many years, with detrimental consequences including increased property prices and taxes, increased disturbance to residents and neighborhoods, and decreased availability of long-term rentals for our citizens.

From my perspective, the County has consistently demonstrated an almost absolute, obdurate inability to "enforce effectively" existing zoning ordinance related to these illegal accommodations. This failure renders the proposed Policy 10 absurd unless and until the "ability" can be demonstrated. As a resident of one of the most-affected neighborhoods for almost two decades, I can assure you that the preponderance of "community input" related to this matter is negative: against the illegal activity and in favor of demonstrated resolve by and ability of the County to enforce its own regulations.

Please do not include this policy in the plan, or modify it to emphasize the community concern that zoning regulations be proven enforceable by County action.

Sincerely,

Dale Evans

Waimanalo
Aloha Council Members,

In the proposed Oahu General Plan, please REPLACE the following language,

"Economic Policy 10: Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively."

by

"Economic Policy 10: Effectively enforce the current ban on vacation rentals and bed & breakfasts in residential neighborhoods in order to bring down rental and housing prices for O'ahu's residents".

Mahalo,

Neil Frazer
Kailua, O'ahu 96734
Please note that I concur with the attached comments. Coming from scholars, these are frightening FACTS of the disastrous policies perpetuated by our elected officials and rubber stamped by Oahu County DPP and the State LUC. My attendance at hearings before both bodies, on the Koa Ridge and Ho’opili projects, shocked me with the realization that carpetbagging developer support is the function of both agencies. Or, as a friend noted, neither regulatory body has ever met a large development project they didn't like.

To reiterate honorables, these are FACTS. We still believe in those don't we?

Ann S Freed
Comments on the O‘ahu General Plan
Submitted from a Joint Special Meeting attended
By Members of four Neighborhood Boards

1. Introduction:

On Thursday, May 5, 2017, the Makakilo-Kapolei-Honokai Hale NB (which had a quorum), and members of the Wai’anae NB, and Pearl City, and Mililani-Waipio NBs held a joint Special Meeting at Kapolei Hale. They were joined by individuals from the Nanakuli NB and members of the public. In all, twenty people attended the meeting. The Makakilo-Kapolei-Honokai Hale NB, along with all others in attendance, voted to send forth the comments on the O‘ahu General Plan contained in this Sections 1 and the following Section 2 of this statement. The meeting was not adjourned. They reconvened on May 7, 2013, and voted to approve Section 3.

We are gravely concerned because the Second Public Review Draft (February 24, 2017) of Proposed General Plan Revisions addresses only the present situation on O‘ahu. However, the world we know today will soon pass, and the Plan does not at all address the major changes O‘ahu will experience while the plan is in effect. For instance, we are stunned that the Plan speaks of only studying the problem of Sea Level Rise as a future goal, while ignoring the known cataclysmic problems we have been aware of for at least a few years and which will begin arising shortly after the Plan is approved.

We fear that the Plan is written to allow the construction community to continue building as they please for self-enrichment, instead of directing where and what they can build in order to meet the needs of the starkly different world we will face in just a few years.

When the water starts breaking through the ground and our beaches and tourists are gone, we are going to be stuck with the high-rises sitting in the mud. A forward looking O‘ahu General Plan should be mapping inundation zones in low-lying areas around the island, and limiting low rise buildings--and forbidding high rise buildings--in low-lying areas. THIS PLAN should already make the choice between raising the ground in the lowlands, or creating a Venice with buildings reached by boat, or clearing the swamp of buildings as the water rises.

There are other major problems this Plan doesn’t acknowledge. The United Nations warns that by mid-century, the world will not be able to produce enough food to feed the anticipated world-wide population explosion. Hawai‘i imports 90% of the food we eat. There will be no outside food. THIS PLAN should be addressing how we can quadruple our farming in 30 years.

Additional problems are discussed in the material below, like exceeding the island carrying capacity, the need to limit in-migration, and resisting the move to desalinated water.
This Plan should also address our huge traffic problem, and the fact that the City wants to build 70,000 more houses in Central and West O‘ahu, many of them before the rail is done. This will double our time in traffic, destroy our family life, and take a major toll on us. THIS PLAN should protect us by insisting that these houses not be built until there is adequate freeway and rail capacity to accommodate the new commuters to the city.

We ask that you go back and start over, writing a plan that addresses these things.

2. Important Findings Which Inform our Request:

Our Neighborhood Boards have used the material on the next five pages as the basis for our request. We ask that you read it before proceeding to the section, Some Changes Requested in the Plan.

Population Explosion

One of the great problems we will face in the next fifty years is world population explosion and mass starvation. There is a stunning article in the August 2016 National Geographic which says that there will be mass starvation in the world over the next few decades, but climate change will not be the primary cause. Population growth will, by far, be a greater and surer cause. Just seventy years ago, there were 2 billion people in the world. Now there are 7 billion. Population has doubled, and doubled again in the last four decades. The article states, “The world needs to increase food production by 60% to feed more than nine billion people by mid-century.” More food production, however, takes more ground water. The terrible truth is that providing sufficient water for farms to feed the rapidly growing population of the world over the last four decades has already decimated world aquifers. As the article says, “NASA satellites have found that 22 of the world’s 37 largest aquifers have passed the sustainable tipping point.” “In the U.S., because of increased farming, the Ogallala Aquifer which runs under the central bread basket from North Dakota to Texas, dropped another foot last year alone.” Many farmers in its shallower areas have already completely run out of water, which will never be restored. This shrinking of aquifers across the world is happening at the same time that exploding population is demanding more water for greater food production. The only possible result will be ever greater shortage of food, and then starvation. On March 11, 2017, the UN humanitarian chief stated: “Already we are facing the largest humanitarian crisis since the creation of the United Nations. More than 20 million people across four countries now face starvation and famine.” Massive world starvation and famine will hit by mid-century.

Local Food Security and Sustainability

Today Hawaii imports 90% of what we eat. By mid-century, there will be no outside food available from elsewhere. We must prepare for this fact or we will die.
To grow all of our own food, we would need to quadruple the amount of food we currently grow for the local market. Instead, we are going the other way. Our government blithely moves along, claiming it will double food production by 2020 while turning over 45% of the O‘ahu farmland that is currently producing food to developers for expensive housing our people can’t afford.

The 1,225 acres of Ho’opili are the last piece of warm, sun-filled farmland on O‘ahu. Experience in recent years has established that crops that need the full-sun of Ho’opili fail in the rainier, higher levels. Many of these are very basic foods in our diet. If we expect to provide the full spectrum of basic foods for the million people of O‘ahu, we cannot afford to lose the warm, full-sun farmland of Ho’opili.

We must begin now to farm all of the fertile agricultural lands that fallow across the state, not only to provide food for ourselves, but for export to a starving world.

Island Carrying Capacity

We have far surpassed the carrying capacity of this island. Even the present planned development is not sustainable. Adding more will bring disaster upon our people.

We have reached our carrying capacity in traffic. People on the West side of the H-1/H-2 merge spend 3 to 5 hours in traffic every day. Yet we have 70,000 more houses zoned in Central and West O‘ahu alone. With the City predicting that an average of one resident from each house will commute to work in downtown Honolulu, that means 70,000 more people will need to commute into the city. But the freeway can be widened only enough to accommodate 12,000 people, and the rail, with every car packed full, can only accommodate 28,000. This will leave 30,000 workers without a way to work. No more freeways can be built. With only the houses currently zoned, the time to get to and from work will double. The burden this will place on commuters, their families, their performance at the work place will be unbelievable. We have obviously exceeded our carrying capacity in transportation.

Tourism has also maxed out. Our country roads, our beach parks, our beaches themselves are so crowded that our own people are deprived of normal lives.

We have also exceeded our carrying capacity for fresh water. Before the last of the houses now zoned is built, we will run out of fresh water. The Board of Water Supply is asking for comments on an Environmental Impact Study to resurrect the desalination plant built a couple of decades ago in Campbell Industrial Park. The plan is to furnish desalinated water to Campbell Industrial Park first. But then the people of West Oahu are next.

If we move ahead with desalination, we open the way for more development. If we hold the line and insist on fresh water only, we have a reason to stop further development.
In America, it is almost impossible to stop people from moving into a place. The Constitution guarantees them the right. However, when an area can establish that it really cannot take more in-migration, they can put a halt. This was done in Santa Barbara some years back when they stopped issuing water meters because they could not supply future water.

Twenty-five percent of our new homes are purchased by malihini, newcomers to the islands. Additional newcomers purchase used homes.

If our low-lying coastal areas will all too soon become swamps which will need to be cleared, and if in-migration is driving the push that is putting more buildings in those areas, clearly we need to get a grip on in-migration. It is time to begin doing what can be done.

Traffic and Additional Housing

Traffic on H-1 is frequently rated as the worst in the United States. People on the West side spend between three and five hours a day commuting. Figures released by DPP reveal that 70,000 more homes have been zoned and are expected to be built in Central and West-Oahu by 2035. DPP states in the recently revised ‘Ewa Development Plan (EDP) that in 2030, a majority of residents in Leeward will still commute to jobs outside the region.(p.4-13). This is more than 70,000 additional commuters. H-1 recently added a second zipper lane. The right-of-way will only accommodate one more regular lane. Together, these new lanes could accommodate 12,000 cars. The rail, with every car crammed full, could accommodate only another 28,000. This leaves 30,000 people needing to get to work in the city. As they cram onto the freeway, it will come to gridlock.

Because of time spent commuting, we miss hours we could spend with our families each day, we miss seeing our kids grow up, we don’t have time for exercise and leisure and community activities. This plan could lift away the tension, anger, and frustration our people experience every day now in traffic, improving commuters’ health. And it could give tens of thousands of latchkey kids, left alone for hours before and after school, the experience and guidance of family again.

The ‘Ewa Development Plan promises that “Zoning and other development approvals for new developments should be approved only if the responsible City and State agencies indicate that adequate public facilities and utilities will be available at the time of occupancy or if conditions the functional agency indicates are necessary to assure adequacy are otherwise sufficiently addressed. (p.5-16) It further states that “its transportation system should...Provide adequate capacity for major peak hour commuting to work in the Primary Urban Center.” (EDP 4-13)
Climate Change and Sea Level Rise

Let us finally look at climate change and sea level rise. Below are the latest maps from the U.H. School of Ocean and Earth Science and Technology (SOEST) forecasting sea level rise in the Kaka’ako, Ala Moana, Mo’ili’ili, and Waikiki areas. Similar inundation will take place in all low-lying areas around the islands. Sea level is expected to rise 1 ft. by mid-century, and 3 ft. by 2100. Builders of hospitals, high-rises, and other buildings that are expected to stand for decades are warned to plan for the worst-case scenario, more than a 9 ft. rise by 2100.

Four decades from now we can expect scenes like these.
This is what Kapiolani Blvd at Atchison will look like in mid-century, with no possibility of getting rid of the water.

Above is what Kapiolani Blvd. itself will look like in mid-century.

This is what the Ala Wai Canal and the area around it will look like.

There will be no way to get the water to recede. It will continue to rise over the decades, perhaps by as much as a foot a decade, with no end in sight for hundreds of years.
Every few weeks our city government approves another high-rise in these low-lying areas. As the seas rise over coming decades, the people of O‘ahu will be stuck with hundreds of derelict high-rise apartment buildings and hotels standing deep in the swamp, darkened, empty, and poisoning the water around. Our multi-millionaires will have simply picked up and moved on from a bad investment; our beaches will be gone and tourism will be completely dead; our tax base will be decimated; our descendants will be struggling to stay alive; and we won‘t have the many hundreds of millions of dollars to tear down the abandoned buildings.

We need now to start preparing for the future. We need to take heed of the strong call by UH SOEST experts to move all future development inland. Residential high-rises need to be built in the higher valleys of Nu‘uanu, Manoa, and Kalihi. None should be allowed more than a block or two below the freeway. We must expect King Street to one day become Shoreline Drive.

Those who would build in the low-lying areas must be forced to place enough money in city-held escrow accounts to pay for demolishing the buildings and cleaning the sites when the water begins to come through the surface. And developers must be forced to give notice to buyers that their buildings will have to be demolished as the water rises. The city must insure that purchasers know they buy at their own risk, and that the city cannot be sued.

Decisions need to be made about the whole Kaka‘ako to Diamond Head, and in low-lying areas all around the island, before any more high-rises are built. How will we adapt to the rising seas? Because fresh water will break through the ground as the seas rise, dikes will not solve our problems. Will we bring dirt from the mountains and raise the level of the ground as the years go on? Or will we attempt to turn the area into a Venice with water between the buildings? In either case, we will need to build high-rises so that all operations can move to the second floor in the future. Or, will we tear down all of the buildings and clear the ground as the water rises, so as to have less-polluted water at our shores? If so, we must build low-rise buildings that can be torn down.

3. Comments on Sections of the Plan

In this section, our comments and inserted words are in blue.

Introduction Although future population projections indicate a slower rate of growth in the future due to an aging population, and mature economy, and problems anticipated with rising sea levels, O‘ahu will continue to maintain its prominence as the state‘s economic, political, and population center. (the last sentence of the section pp-4-5.)
Preamble 13. . . A sustainable Honolulu would have the capacity to support the current generation’s demand and use of its resources without compromising the ability of future generations to meet their own needs. To do this, the City and County shall seek to find the appropriate balance and synthesis of the major elements of sustainability that are essential to the creation of a sustainable place:

Food security  
Fresh natural drinking water  
environmental protection  
economic health, and  
social equity.  (p.7)

Content of the General Plan 14. . . Examples of what sustainability means in practice are:

compact and mixed-use development patterns that encourage higher densities and conserve energy  
preservation and protection of agricultural, natural, and open space resources  
greater recycling and waste stream reduction, encouraging rain water catchment systems  
use of renewable energy sources to reduce dependence on imported fossil fuels where economically and environmentally appropriate  
greater production and consumption of locally-grown food and locally-produced products, economic diversification that emphasizes the well-being of O‘ahu’s residents and is resilient to changes in global conditions, and  
greater awareness that the collective “social capital” within communities is vital to maintaining a strong and productive society
  * providing directions for growth that will properly accommodate sea level rise  
  * providing directions to prepare for and to properly accommodate the cut-off of imported food due to the problems of world population growth, starvation, migration, and wars for food elsewhere.  
  * creating laws and monetary-deposit requirements for those now moving into areas that will become swamp land by the end of the century which monies will later pay for the removal of the buildings  (p. 8)

16. POPULATION The population objectives and policies encompass two three distinct thrusts. The first is: First, to control population growth to the extent possible to avoid social, economic, and environmental disruptions. Second, to plan for anticipated future population growth in a manner that considers the limits of O‘ahu’s natural resources, that protects the environment, and that minimizes social, cultural, economic and environmental disruptions. The second is And, finally, to maintain a pattern of population distribution that will allow people to live, and work, and play in harmony. The map at the end of Chapter 1 conceptually shows the development pattern on O‘ahu in relation to Policy 4. The distribution of residential population percentages in Policy 4 and the map are not regulatory, but are guides to population growth in each of the DP and SCP areas

We vote to keep all of the above. We strongly disagree with dropping the controlling of population growth. We have reached the carrying capacity of the island in many areas.
TRANSPORTATION AND UTILITIES  This Transportation section is just sweet-talking waha. It needs to address the fact that traffic is destroying our lives. We won’t be able to get to work in the city if we keep building. It needs to put in the language from the Ewa Development Plan guaranteeing adequate capacity for commuters going to and coming from the Primary Urban Center.

Utilities -- Population growth results in increased demands for water, sewage, and solid waste disposal services provided by government, as well as the communication, electricity, and gas systems provided by the private sector. Not only must such needs be met, but the social, economic, and environmental consequences of meeting these needs must be carefully considered. This is where the Plan needs to address carrying capacity and running out of fresh water, and how people of the West side will wind up drinking the desalinated water.

24. PHYSICAL DEVELOPMENT AND URBAN DESIGN

This section needs to give directions that reflect climate change and sea level rise. Such as no high-rises below the freeway in the city. And deposits by everyone building in the lowlands to pay for later tearing down.

The General Plan now also contains an objective on climate change and sea level rise. It calls for all public and private organizations to prepare for the future problems caused by rises in sea level, rises in groundwater levels, and more frequent and severe storms, shifts in local rainfall patterns, and higher urban temperatures. The Climate Change Adaptation Priority Guidelines of the Hawai‘i State Planning Act, HRS 226, support planning and preparing for future disruptions and dislocations due to climate change.

CULTURE AND RECREATION

It is good that you are addressing this. People on the West side have no leisure. The reason is our commute. Additionally, many of us work two or three jobs to survive. This section needs to address how to give our people time for leisure. If we stopped building on the West side until rail is complete, and added one new lane to the freeway in the meantime, we could bring the freeway back up to LOS D, and get people home 40 minutes to an hour faster. This Plan could do that.

29. The use of leisure time is addressed through objectives and policies encouraging visual and performing arts and the provision of a wide range of recreational facilities and services that are readily available to all our residents and visitors. New policies also call for utilizing our unique natural environment in a responsible way to promote cultural events and activities, and for creating and promoting recreational venues for keiki and kupuna and for kama‘āina and malahini.
Chapter 2

Affirms Waikīkī as the primary resort area and identifies secondary resort areas. Reshapes policies about Waikīkī’s future redevelopment to focus on maximizing the quality of the visitor experience, rather than applying technical growth controls. This section should be focusing on how to save the beaches in the short term, and how to deal with tourism once the water begins breaking through the ground.

Comments from Larry McElheny (North Shore):

Population size is the foundational issue from which all other issues grow. Therefore, it is rightly first and foremost in the current General Plan:

“To control the growth of Oahu’s resident and visitor populations....”
“Publicize the desire of the City and County to limit population growth....”
“Reduce immigration.....”
“Control population growth.....”

For an island with finite resources, these policies make perfect sense.

In light of these facts, it is very disturbing that the revised draft does the following:
“Eliminates references to limiting population growth.....”
Makes no mention of over-population or carrying capacity.....
Sounds as if we are going to allow unfettered growth.....

Please encourage the Department of Planning and Permitting to retain the population policies that appear in the current General Plan and strongly encourage the “powers that be” to comply with those policies.
Please do not change our plan that was submitted in good faith after a lot of hard work. I do not agree with any change that will make our rural area into a city. We do not want to be Kailua. We do not have the infrastructure to support a city way out on a 2 lane road. It would be irresponsible to open this area to development. It would be indefensible to protect and care for a large population out here in a natural disaster. Our power goes down all the time already. We have brown water alerts every time it rains hard, and that is sewage in the water as we all know from recent testing. Laiea floods all the time from over-paving. There is no trauma center, no hardened hurricane shelters, a lack of enough police and fire. It will not solve anything to help local families.

Sincerely, Laura Gray R.N.
I oppose Economic Policy 10 to the proposed General Plan. At first I thought it was a joke but April Fool day has come and gone. Economic Policy 10 should be eliminated in its entirety. The last thing we need are more tourists in our neighborhoods, less housing units for local residents and more homelessness. DPP is unable to currently enforce the rules prohibiting short term rentals as evidenced by all the ads on the internet. I have been reporting the illegal’s in my neighborhood for years and several still exist. How about effective enforcement of the existing illegal’s before we even entertain adding to our problems. There will always be a market demand as it cost tourists a lot less for food and lodging than staying in a hotel and the landlord makes a lot more than renting long term.

Chris Godwin
To whom it may concern;

Please do not let the blight of illegal vacation rentals to convert our residential neighborhoods into visitor resorts. Our immediate neighbor, a realtor for Sterman Realty on the north shore, has been operating such a rental for years. The DPP sent out an inspector during the last administration. His name was Todd Lebang. Of course, the neighbors coach the "guests" to say that they are family. Mr. Lebang also informed me that no taxes were being paid, that the rental was entirely illegal. This is unfair, socially irresponsible, and disturbing.

Please vote Against economic policy 10.

Thank you,

Jo Jennifer Goldsmith
Aloha,
I would like to provide the following comments to the Oahu General Plan (GDP) as a resident of Ko’olauloa:

[1] The GDP gives three major elements of sustainability that are desired to be balanced: environmental protection; economic health; and, social equity.

[2] The GDP also lists “preservation and protection of agricultural, natural, and open space resources” as the second highest example of what sustainability means.

Section II, Objective B, Policy 4: Designation of Laie as a “Resort Area” is inconsistent with the above and completely contradictory to the intent of sustainability.

- Koolauloa is the last place on Oahu with large parcels of undeveloped, green, open space and unobstructed views, which is the reason visitors (and residents alike) come to this part of the island. Expansion of Laie or PCC onto undeveloped lands such as Gunstock Ranch and Malaekahana are contrary to any reasonable definition of preservation or sustainability and should not be permitted.
- Additionally, development of this last green corridor on Oahu’s shoreline would not be providing any meaningful longterm economic health or social equity—rather it would most likely do the complete opposite by transferring the wealth inherent in the land and that we all enjoy, and extract it for whatever major corporation or investor that does said resort development.
- Only a handful of locals would get any of the top paying jobs, and the construction boost would be only temporary.
- Residents in surrounding villages of Kaaawa, Punaluu, Hauula, and Kahuku would be forced to bear the largest burden of excessive and dangerous heavy vehicle traffic, increased road work and delays as infrastructure is expanded, loss of precious and cherished open space, and an overall degradation of lifestyle due to direct and indirect impacts associated with overdevelopment in an area that is not compatible with it.
- Large amounts of terrestrial runoff and increased sewerage inputs could overrun current infrastructure and likely cause large pollution events and degrade our shorelines and marine life.
- In summation, this policy is inconsistent at best, and completely contradictory at worst, to the GDP’s stated purpose of sustainability. This policy must be revised to reflect a real definition preservation in Koolauloa, by removing Laie from the list of designated resort areas.

Section II, Objective B, Policy 10: Increased transient or vacation rentals should only be allowed with community consent, or limited to Waikiki.

- These rentals are out of hand, and depleting the sense of community in many areas of Oahu.
- Major limits need to be imposed, with strict enforcement and penalties.
- Any owner or manager convicted or fined for previous illegal vacation rentals should be permanently barred from owning or running them.
● Having had an illegal vacation rental adjacent to my home for several years, I know first hand the corrosive effects they have on the surrounding homes.
● Communities should have a “veto” authority for unruly or irresponsible vacation rentals in their areas. Let us vote them out of their permit if not responsible.
● Outright ban on vacation rentals in rural areas.

Mahalo,
Chris Goody
Kaaawa, HI 96730
Aloha HHF/DPP planners,

I am submitting comments pursuant to the public meeting of 7 March, which unfortunately I cannot attend. My comments relate to Policy 7 of Objectivell. B, relating to tourism.

Policy 7 includes Laie as a secondary resort area, commensurate with Turtle Bay. This designation is fundamentally inconsistent with II.B. Policy 3, which calls for the protection of public services, respect for existing lifestyles and cultural practices, and preservation of a unique sense of place and natural resources.

Laie is the most distant point on Oahu from the main tourist hub of Waikiki. On the Windward side, it is accessible only along Kamehameha Highway via already traffic-saturated Kahekili Highway; and along the North Shore in the opposite direction past every famous beach on the North Shore, which in winter and on weekends is also traffic saturated. Traffic delays in both directions is already abysmal at peak hours and on weekends, and is a situation that will only get worse from approved further development at Turtle Bay. As Turtle Bay has shown, creating an employment center for minimum wage jobs in Laie will not reduce traffic demand; new visitors will far outnumber new, local employees. Considering the cumulative effect of resort traffic added to the planned expansion of enrollment at BYUH, this additional traffic load on Kamehameha Highway will be a nightmare for those who live in Kaawa, Punaluu, Hauula, Laie and Kahuku. This roadway is already dangerous at most times, and it is often difficult to safely cross the highway or proceed along it by foot or bike. The road is frequently subject to closure from vehicle crashes and stormwater flooding, and increasingly from ocean conditions. Continued sea level rise will put this roadway at further jeopardy; in this regard resort development at Laie also flies in the face of Policy III.A.12, regarding adapting to the impacts of climate change. There is no space for expansion or relocation of the roadway mauka, without condemning private property of homeowners along the route.

For visitors, other than the Polynesian Culture Center which is essentially a one-day experience, the beaches are the principle amenities. Malaekahana is one of the last “wild” beaches on Oahu, bounded mauka by woods, with pounding surf and off-shore islands makai. A resort across the road from these “wild” beaches would lead to their being further degraded by crowding, trampling over coral shallows to visit offshore islands, and displacement of local beach users; there is insufficient access and sanitary facilities to handle resort level numbers of visitors. to make it suitable would completely change the character of these beaches.

All told, there is no public good to be met in allowing resort development at Laie, where profits for investors from the increased visitors will come at the expense of residents who will bear the cost through degradation of public services, quality of life, and rural life styles, and change the natural qualities of the coast. There has got to be a limit; Laie is simply not suitable for resort development, it is just too far.

Thank you for your consideration of these points.

Best regards,
John Goody
Kahaluu
We have reviewed Policy 10 of the proposed General Plan, namely: "Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively."

As you know, the DPP has not been able to enforce the current restrictions on B&Bs and TVUs, and until they can demonstrate an ability to do so, We strongly oppose placing this language in the General Plan. A more appropriate language for this policy would be to require enforcement of the ban on B&Bs and TVUs in residential neighborhoods to increase the supply of long-term residential rentals, reduce housing costs and promote family oriented neighborhoods. Thank you for your consideration,

Richard and Francine Hagstrom
Kailua
Aloha,

I have a few comments regarding the O‘ahu General Plan.

Line 90, Policy 7 - Do we have sufficient infrastructure and water to service these areas? West side resorts should be limited due to traffic and lack of water. If certain districts cannot provide sufficient resources for themselves, development should be restricted.

Objective C - Sounds nice but we cannot ensure long-term viability unless we preserve agricultural lands like Ho‘opili and prevent them from development. We already know our current freeway system and Rail when finished will not be adequate to accommodate 30K+ new cars expected in Ho‘opili. Limit development of middle income to luxury homes unless we are able to provide water and local food and meet traffic needs. There should also be an effort to grow storable stables such as rice and food forests in case of long-term disasters.

Line 116, Policy 14 Every farmer should have the right to farm, but what does right-to-farm laws mean? If it means right to spray pesticides and potentially poison ground water and air then please delete this section. We should be encouraging clean and healthy agricultural practices.

Line 147 Policy 8 - What is the city doing to protect the pueo?

Has the media been involved in encouraging community feedback? I would not have heard about had I not been involved in the neighborhood board.

Mahalo for the opportunity to submit my comments.

Best Regards,

Mitsuko Hayakawa
Member, Pearl City Neighborhood Board #21
Economic Policy 10: Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively."

This is the only sensible thing to do.

Mahalo,

Dianne Higgins
Testimony on the General Plan by Vernon Hinsvark

The bolded text below in Line 14 state the importance of sustainability and social equity.

The bolded text below in Line 71 state the importance of an economic base resilient to changes in global conditions. Tourism is not resilient to changes in global conditions.

**Line 95** (see below) **is not a general plan goal.** It is a policy goal that undermines the general plan goals stated in Line 14 and Line 71. Line 95 promotes removing much needed housing from the growing need of our future generations.

Commercial rentals in our residential neighborhoods remove much needed housing from local availability. This invites investor speculation that raises the prices of existing homes putting out of reach of the local population. This “double whammy” is the polar opposite of purpose of the General Plan. **Line 95 should be removed from the General Plan.**

Sincerely,

Vernon Hinsvark

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Below are three excerpts from the pdf document with the title “OahuGP 2nd PRD-FEB-2017-Changes

**Line 14 Page 8 Content of the General Plan**

A **future which is sustainable** is also of great importance for an island community interested in the current and future well-being of its people. The principles of sustainability recognize that there are limits to the complex network of systems (environmental, economic and social) that define our lifestyles and our overall well-being. A sustainable Honolulu would have the capacity to support the current generation’s demand and use of its resources **without compromising the ability of future generations to meet their own needs.** To do this, the City and County shall seek to find the appropriate balance and synthesis of the major elements of sustainability that are essential to the creation of a sustainable place:

- environmental protection
- economic health, and
- **social equity.**

**Line 71 Page 25 Policy 1**

Support a strong, diverse and dynamic economic base **resilient to changes in global conditions.**

**Line 95 Page 27 Policy 10**

Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively.
Greetings, and thank you in advance for your time. I have several items that I would like to propose be considered for inclusion in the next revision of the Oahu General Plan.

Sincerely,
Nicole Hori

Honolulu, HI 96813

II. Under "Objective E To prevent the occurrence of large scale unemployment."

Policy 5 Develop best practice maintenance standards for all City and County-owned properties to minimize lifecycle costs and provide (shovel-ready) jobs (this could also fit under VI, Obj A, Policy 12 by extending the useful life and thereby reducing the energy inputs used for constructing buildings)

Under "Objective G To bring about orderly economic growth on O'ahu."

Policy 3.5 Designate areas near public transit for future moderate-scale TOD development, to be allowed when construction/economic activity falls below a pre-specified threshold.

IV. Under "Objective A To ensure a balanced mix of housing opportunities and choices for all residents at prices they can afford."

Policy 2.5 Provide additional resources for permit enforcement and a path to legalization that compensates members of the community who have abided by the rules. (apparently widespread code violations make VA housing purchases hard, and many kama'aina who try to follow the rules feel unfairly treated)

Policy 12.5 Maintain affordability by allowing reduced parking structure requirements for buildings which are in close proximity to a bus trunk line or rail and also provide residents with secure bicycle parking and/or bike share, and have a car share partner with dedicated spaces in the building.

Policy 18 Encourage the State and Federal governments to transfer excess and underutilized land to the City and County for affordable and emergency housing. (see https://www.citylab.com/housing/2017/04/the-unsung-government-program-that-gives-federal-property-to-the-homeless/524277/ )

Policy 19 Provide for gradual (40 year phase-in), tax neutral shifts in the rate at which land and improvements thereon are taxed in central portions of the urban core where development is desired. A decreased tax rate on improvements will increase the value of the improvements and be compensated for by a gradually increasing rate on the land itself; the return of maximizing the use of the property will increase, and more housing will
become available (could also fit under IV, Objective C)

Under "Objective B To minimize speculation in land and housing."

Policy 6 Ensure that owners of agricultural land, including properties that are taxed at an agricultural rate, continue in agricultural production and investment over the long term. (in practice, there could be a recapture penalty similar to the one if a historic home is torn down, while not requiring farmers to show an annual profit)

Policy 7 Provide for a higher tax rate for properties which are not the primary residence of a Hawaii resident, in order to incentivize the addition of units to the rental market which might otherwise remain vacant as investment properties.

V.
Under "Objective D To maintain transportation and utility systems which support O‘ahu as a desirable place to live and visit."

Policy 3.5 Provide for the installation of underground powerlines from urban corridor along at least one road into each valley, terminating at a centrally located school or park (to facilitate community-led hurricane cleanup and aid accessibility) (Could also fit under VIII, Obj. B, 11.5)

VII.
Under "Objective A To coordinate changes in the physical environment of O‘ahu to ensure that all new developments are timely, well-designed, and appropriate for the areas in which they will be located."

Policy 9.5 Ensure that tree canopy coverage in areas with new development is maintained at levels consistent with the green character of Oahu. (This is a little stronger than wording in III.A.9, which is also appreciated)

Under "Objective B To plan and prepare for the long-term impacts of climate change."

Policy 4 Develop innovative approaches to climate change resiliency that will be a model for communities in other states (since they will have more time than us in which to act).

In Objective E, Policy 6, please delete "; and modest adjustments to growth boundaries to maintain an adequate supply of housing for future generations." Given the allowances made earlier in this statement for increased height around the town areas and the replacement of any housing inventory in the Policy 5 immediately above, it is inappropriate to increase density by altering growth boundaries. Both rural residents and people in town appreciate the open land in the country!

VIII.
Under "Objective B To protect residents and visitors and their property against natural disasters and other emergencies, traffic and fire hazards, and unsafe conditions."

Policy 7.5 Establish adequate hurricane shelter designated locations, and keep the public informed of the nature and extent of hurricane disaster readiness.
Dear Sir/Madam,

This is in support of the proposed language changes of the SECOND PUBLIC REVIEW DRAFT O‘AHU GENERAL PLAN *Your Island. Your Future*.

"**Economic Policy 10: Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively.**"

The practice of transient rentals has become a serious problem since the issuance of NCU’s in the 1980’s legalizing the operation of B&B rentals, allowing 800+ to still operate. The subsequent denial to suspend the practice due to negative feedback and inadequate regulation, for the past 29 years, by the City Council has created an extremely hostile and rancorous environment on Oahu and by taking no action has made our neighborhoods literally unsafe for its residents.

Many owners trying to stay and maintain their homes have taken to operating B&B’s to make ends meet. They have applied for and received both GE and TAT licenses and although they are paying all of the appropriate taxes, from which both the state and county benefit, they remain unpermitted. Enforcing regulations by the county will eliminate this revenue.

This new language in the General Plan is a welcome step toward some kind of resolution. We all recognize that the investor both local and offshore abuse of uncontrolled and unsupervised home rental through the internet on many of our beach front communities and neighborhoods is appalling and undesirable. However, grouping these large operations with greed-driven operations together with local families trying to stay in their homes by providing owner/operator controlled services is like comparing apples to oranges.
Owners do not oppose a thoughtful regulatory process to allow them to operate, which has never been implemented, and welcome the opportunity to participate in the process and still let our communities continue to grow responsibly. Recent bills encouraging neighbor lawsuits does no good for neighbor relations and advocates neighborhood tension to the point of hostility. By implementing a reasonable permitting process, the City could legally grow its funding without jeopardizing its principles.

We, again, wholly support the language changes look forward to an new era of change.

Sincerely,

Millie Hyde
To the Department of Planning & Permitting and HHF Consultants:

Here are some comments. We are not lost to the fact that there is a small group of power and well-connect persons who have a different "MASTER PLAN" for the future of our Hawaiian Islands. This elite "Master Plan" runs parallel to the mainstream populace's concerns, wishes and dreams.

We are aware that there are some who feel that the entire Oahu should become developed into the urban center and to allow other islands for agricultural purposes. This is short-sighted and not pragmatic. Even so, the other islands are under pressure from the same urbanization sprawl that Oahu is suffering from. There are those who also have dreams of having the rail come to Mililani and the Windward area.

Development is exciting and wonderful. But in the best interest of children and their children, we need to remember that we are a tiny chain of islands in the middle of the vast Pacific Ocean. We're the most remote islands from any large land mass. We cannot copy-cat Singapore or Tokyo or San Francisco or New York or Los Angeles. Although Singapore imports 100% of its food and buys water from Johore, Malaysia, Singapore is only half an hour from Malaysia, Indonesia.

We are also aware that if Mayor Kirk Caldwell were not the Mayor of Honolulu, the directions of where Oahu will take will be drastically different. But we as an island, cannot be held hostage to a misguided leadership that is currently at Honolulu Hale.

We are also aware that there are many who are involved due to employment or positions or beholden to their bosses or higher authorities. But this is no way to truly and righteously to plan for an island's survival and sustainability and happiness for the future. History will judge us. We cannot become pawns to crass 1% profiteering at the expense of the 99%.

We are concerned about the organization and the arbitrary management of the Department of Planning and Permitting. There have been many times, when the existing Sustainable Plans have been violated by DPP because its guidelines and ordinances are not adhered to or respected.

As Governor George Ariyoshi, the father of the Oahu General Plan, has said, "If we skip from one project to another, we will incrementally lose what we hold dear about Hawaii."

It's alarming that the present Oahu General Plan is drastically opening the floodgates to untethered development in the future. Other development plans and sustainable plans have been approved BEFORE the Oahu General Plan is updated.

The current version of the Oahu General Plan is DRASTICALLY changing the Plan that the public has appreciated and loved through the decades. As many will specifically point out, the deletion of the population control fact, the additional weight given to tourists, the floodgates to transient accommodations, the "organic
growth of housing in communities", the hotels in communities, or zone "resort" in rural areas are all very alarming and not preserving the diversity and sustainability of Oahu.

As expected, the proposed changes include Transit Oriented Development (TOD) around bus terminals. This, of course, further proves that the Honolulu Rail is not needed for TOD and yet we're incurring immense costs and debt to our residents and our children's future.

We're also aware that the entire 21 square miles along TOD corridor could be transformed into Kaka'ako. If this happens, it is all the more important that the rural areas of Oahu be preserved and protected.

We are aware that Mayor Kirk Caldwell underwent a "deathbed conversion" when he promised the Sierra Club that he would KEEP THE COUNTRY COUNTRY, and not support "ENVISION LAIE" subdivision at Malaeakahana, a sub-district of Kahuku. This was in exchange for the endorsement of the Sierra Club for his 2016 Mayoral Race.

Unfortunately, the Mayor is dishonest as he's currently suing 3 Hauula kupuna in federal court to force the extravagant Hauula Fire Station Relocation on them. It should be noted that the City Council deleted and defunded this project for years but Mayor Caldwell continues to bully the most affected people in court. It's also outrageous that he has also opened this project up for bids ( around $7Million) when there are not money allocated to this project 2000068. This project is a TROJAN HORSE for more new development in this rural area.

We bring this specific project to simply show that there is no consistent adherence or respect for the existing Ko'olauloa Sustainable Communities Plan or the Oahu General Plan.

Let's all cultivate a sincere desire to plan well for our island's future and for its public good. We may have positions of powers now, but there is no guaranty that these powers and influence or profits will last through the next generations.

Let's all give our best and display courage and sincere efforts to do our best for our island home. Let's adhere to the Oahu General Plan and not turn Oahu into New York!

Mahalo,

Choon James

Reference:
http://www.civilbeat.org/2015/03/oahu-general-plan-provides-diversification-and-sustainability/
Aloha mai,

I am the Subdistrict Representative for Niu Valley on the Kuli‘ou‘ou / Kalani Iki Neighborhood Board No. 2 as well as the Secretary to the Niu Valley Community Association. These are my personal comments on the proposed revisions to the O‘ahu General Plan:

Super model turned mogul Kathy Ireland was issued a Notice of Violation in 2010 for illegally renting out her home called “Oceanfront Oasis” in Niu where I live. She continued having illegal short term rentals, weddings and large parties with hundreds of partygoers that took up 4 blocks of parking in our neighborhood and sometimes the majority of parking spaces at Kawaiku‘i Beach Park which deprived the public the use of this popular park. She continued to advertise on her Facebook page, website, YouTube, all of the vacation rental websites, and even on the front page of the Advertiser. By 2014, her fines for her illegal operations accumulated to $109,000; however, the Department of Permitting and Planning (DPP) reduced the civil fines by $103,312.50, to a mere $5,687.50 (or the income from a one weekend booking). The DPP required the immediate removal of the property manager, who moved less than one mile away into another oceanfront home in Wailupe and set up his vacation rental, weddings and events commercial business there to the detriment of those neighbors. According to CPA Natalie Iwasa, while the city assessed $7.9 million in fines in one 12-month period in 2014, they forgave $6.9 million, meaning that they attempted to collect less than 15% of fines assessed.

Three years later, in 2017, and it’s business as usual, but now Ireland’s home is called “Villa Elizabeth” and while it’s still being advertised on her website, it’s now available as an AirBnB listing. The slap on the wrist that she received from the DPP obviously did not hurt her, her business or deter her in any way. The DPP must stop its practice of negotiated settlements and being allowed to reduce fines to ridiculously small sums.

My community’s complaints against vacation rentals and your proposed condotels in residential neighborhoods are not just because they are illegal, it’s because we do not want to live next door to hotels. We bought our homes in residential zoning because we want to live among neighbors, not tourists. Vacation rentals are commercial businesses that change the residential character of the neighborhoods and reduces O‘ahu’s housing and rental supply which drives up housing and long-term rental prices.

Lastly, at the Kuli‘ou‘ou / Kalani Iki Neighborhood Board No. 2 meetings, we’ve heard many complaints about too many tourists and users of our parks, beaches and trails. Creating and promoting recreational venues in our natural environment will ruin its uniqueness, and they are already at risk for staying “natural.” Former Gov. George Ariyoshi said over 10 years ago that the question of carrying capacity goes to the heart of everything, and precious few people want to face it. I think it’s time we actually face the fact that we have allowed O‘ahu to become overrun with hordes of tourists, allowed rampant development and foreign investment to the detriment of our residents and allowed the things that we love about O‘ahu to be ravaged for a few dollars.

In case you missed Lee Cataluna’s column on 4/12/2017, it quite clearly points out some of the problems with your proposed revisions to the O‘ahu General Plan: “Then there’s the visitor industry that has grown past the ability to show tourists a good time. Tourists notice the traffic and count the hours of their vacation wasted on our ugly roads. They get disappointed by "remote" trails with hundreds of people filing through every hour and "unspoiled" beaches that are showing signs of spoilage. They wonder why all the stores here are the exact stores they have back home. But Hawaii
has taken that leap, encouraging vacation rental investors to illegally churn their properties 52 weeks a year in what were once quiet residential neighborhoods. We greet millions of tourists with a dingy, leaky airport and the Third World ambience of Nimitz Highway, and convince ourselves that it's OK because they still keep coming.”

Mahalo,

Jeannine

Jeannine Johnson

Honolulu, Hawai'i 96821

The past teaches; the present motivates; the future inspires.
Aloha,

For a number of working people who have been unable to find the time to participate in the recent discussions on the proposed revisions to the Oahu General Plan, I have been asked to submit some general comments for the consideration of our policymakers and decision makers. These are our collective observations of about what we see happening in Honolulu today and suggestions for the future direction laid out by the Oahu General Plan.

In short, myself and five other individuals have had discussions recently about all the building happening around the island, and in Honolulu in particular, and in spite of the fact that this may be part of an approved plan for higher density urban development to accommodate rail, we all have strong feelings that what this is now doing to Oahu, and the Primary Urban Center (PUC), is not good for the future of the people of Hawaii.

Simply put, there is too much building, too many skyscrapers, not enough open space for the common people. This development seems to be an attempt to pack too many people onto an island with limited land space, limited water resources, etc. If successful, the island may not have the sustainable carrying capacity of resources for us to survive here. Also, all this building will harm the other islands as well, as people who move to Oahu and decide they dislike what has happened here then try to move to the outer islands to escape the congestion, crowds, heat, etc. that occur in overpopulated cities like Beijing, Los Angeles and other very big cities.

We respectfully ask Oahu’s policymakers and decision makers to seriously reconsider the consequences of our current trajectory, and consider any comments received on the Oahu General Plan that finally seek to implement the controls on population growth on the island that were written into the plan decades ago. This may well mean limiting further construction so as not to encourage more people to move to Oahu. It may also mean finally implementing rent control, the same as other big cities like San Francisco and New York did years ago. It may require more affordable housing units in new residential and mixed use developments.

Of course, implementing these suggestions will require political courage and leadership, and some sacrificing for all of us, but to reach the future we desire, to halt the current trajectory of heavy construction, development, and intensifying population growth, implementing these suggestions is necessary before we lose the things we hold most precious about living on Oahu.

There are people who are much more informed about the specifics of how these suggestions can be implemented and how managing the population increases and controlling future development can be done, but the aspirations and suggestions expressed in this letter are what we desire. Please work into the Oahu General Plan any specific suggestions you receive that will help achieve these things.

Mahalo for your consideration of these comments.
I left the meeting early after previously reading the current draft because it was clear the current project will not address my concern that the plan as it exists is and has long been irrelevant.

In my view, a plan is only relevant if it is a guide to action. It should reflect choices made by the community in significant policy areas. If the community is not ready to make a decision, the plan should say so. But retreating from controversy or making no decisions, or making only minor tweaks, in pursuit of issuing a consensus document means the plan, for me, is irrelevant. It is not useful, in my opinion, to issue a plan that is merely a wish list or compendium of "apple pie" aphorisms. It should not serve as a Rorschach for decisionmakers to justify any decision they make. In the presentation, quoting Mayor Fasi’s dictum that plans should not identify how goals are to be achieved only confirmed my conclusion.

Unfortunately it seems the City has long had a different view. As a planner, that’s disappointing.

Ivan Kaisan
Honolulu HI 96822
Policy 10: Effectively enforce the current ban on vacation rentals and bed & breakfasts in residential neighborhoods to bring down rental and housing prices for O'ahu's residents
I am a retired social work administrator and a 40 year resident of Ka'a'awa and am deeply opposed to the rampant out of control increase of vacation rentals in Ko'olauloa! Kama'aina are priced out of the local rentals, replaced by upgraded Bed n Breakfasts rentals, majority being illegal and owned by absentee landlords. Let's be real, it goes beyond just making a living, but is biggest bang for their buck. Please have a heart for us. There are no more keiki playing on the beach front roads. Guess they've joined the Hawaii homeless as they can no longer afford a home in paradise.

Sincerely Sad,
Gwendolyn Kim, MSW, ACSW
before any changes to the general plan regarding tourist accommodations in our neighborhoods, enforce current laws which do not allow these. We are being inundated with more and more tourists creating a shortage of rentals local families could use.

Enough, already!! Mary King, Kailua
From: D. Kobayashi  
Sent: Wednesday, May 03, 2017 2:33 PM  
To: General Plan 2035  
Subject: Comment of the Revised General Plan Second Public Review Draft

Commentor: Dawn Kobayashi  
Mailing Address: Honolulu, HI 96822

Proposed Amendment:  
II. The Economy  
Objective B, Policy 10  
Permit small-scale community oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively.

Change to: Encourage tourists to seek accommodations in Waikiki or at Secondary Resort areas. Discourage small-scale community-oriented visitor accommodations.

There is a severe shortage of affordable rentals for residents and a significant increase in B&B/IVUs across Oahu. The general welfare of the people of Oahu need to be addressed immediately with providing access to affordable housing. The impact on the Community with transient rentals are negative for residents. With transient housing, there is always more noise, traffic congestion and loss of community character. There has been difficulties in enforcing tax laws on these B&B rentals. Tourists do not have a vested interest in the community when they are staying at a B&B for a week, versus a long-term renter who is involved with the Community and wants to make it their place.

Thank you for considering my testimony on the General Plan.

Mahalo,

Dawn Kobayashi
Sent from my iPhone

Begin forwarded message:

From: Joan Koff  
Date: March 1, 2017 at 12:32:53 PM HST  
To: gp2035@hnf.com  
Cc: Joan Koff

Subject: Against: Proposed Oahu General Plan

To whom it may concern:
As I read through the goals and objectives of the proposed Oahu General Plan, I am disturbed by a few things. I oppose development in the Koolauloa rural area, specifically the plan to in Policy 7 to facilitate secondary tourist destinations at Turtle Bay Resort and in Laie. This is not at all consistent with other plan objectives which are to mitigate against the negative effects of global warming and protect the environment. The plan for this area was to have 1% or so of population; the roads and infrastructure are inadequate to maintain higher density as has been previously discussed at length. The surrounding community boards (except Laie) and most of Oahu's neighborhood boards have come out against this proposed development. The sneaky developers continue to insert their selfish short-term agendas into our sincere hopes to guide our future development responsibly. Please delete Turtle Bay Resort and Laie as desired secondary tourist designations.

Also, the issue of unlicensed transient accommodations should be dealt with by our legislature. To again sneak into critical planning document, the approval of such short term vacation units inside of rural area and other private communities goes against our citizens' rights to consider whether these accommodations should be in our communities. By adding this to a planning document, it would appear to give this serious issue permission to move forward. This is inappropriate and should be placed in the hands of legislators first.

Thank you for your attention.

Joan Koff, PhD  
Registered Voter
Dear committee,

I am writing as a concerned citizen. I am also a member of the Manoa Neighborhood Board. I have lived on Oahu since 1973. It is my home and home to my family. I care a great deal about the future development of Oahu. That said, I offer the following observations about the proposed Honolulu General Plan. Overall, there are several conflicts within the draft which will lead to litigation and confusion. On p. 16 of the original Honolulu General Plan, the City Council can amend the General Plan. Yet, the City Council presently has no mechanism in place to identify problems with the plan. I believe at this point it is unwise to give the City Council this ability without the proper safeguards in place as to when the plan needs to be amended and the process the City Council will have to use to amend it. Therefore, I propose to go back to the system of orderly 10 year reevaluations or even 15 year reevaluations.

Objective B, Policy 3 guides visitor development in a manner which avoids unsustainable increases in providing public services (p. 22 of the proposed Honolulu General Plan). It is thus an oxymoron to later go on an develop an extra section for secondary development. Imbedded in the document are concerns that the developers will be made to pay for all improvements. This has not nearly come to fruition in our own examples in development in Honolulu where builders have not complied with affordable housing requirements, park area build-outs, sidewalk completion, etc. Objective B, Policy 3 broadly offers the development of secondary tourist destinations. In this Policy 3 we should insert language that narrows the development possibilities to existing population and other restrictions in these secondary areas. Otherwise, we offer hotel developers an opportunity to individually design systems within their own conceptual frameworks which have nothing at all with the communities within which they are imbedded. An example of overreach would be at Laie, where developers could advocate for enhanced tourist development without considering the impact of that on the fragile ecosystem in that area, the limited roads in that area, the limited emergency access to that area, the likelihood of despoiling the earth, ignoring native practice, etc. Furthermore, giving this special treatment of recognition, allowing 5 areas of extremely beautify and sacred lands to tourists, we set the stage for developers to ban together and collectively submit their demands to the city for infrastructure, etc. This may set up a bad precedent of essentially special interests having too much power. It would be as if we set up a special category for "grocery stores." Currently, grocery stores have to conform to the area in which they are situated. This makes more sense to me. I propose that the section designating secondary tourist destinations be stricken. Instead, tourist destinations should be handled within the boundary of the geographic area in which they fall. Similarly, secondary tourist destinations should be made to conform to other priorities of the City and Council plan--saving agricultural land, water, and other resources critical for local survival.

Objective C, Resident's Choice. Policy 3 in this section encourages co-locations of housing, work and services too broadly. Although I can understand the logic of this situation, it really can destroy any hope of rural preservation. Rural areas do not generally provide adequate employment, housing or services. Indeed, the lifestyle is generally more self-reliant. That is the actual choice of residents who call those areas home. They are welcome to move to more densely populated areas. However, the broad policy here, invites an urban sprawl type of development we see so evident in other US areas with strip malls being the central areas and light industrial parks being employers. This type of development in rural areas will destroy scenic beauty (another priority) and threaten sustainability (another priority). Therefore, rural areas should be exempt from this planning strategy.
Policy 5. The development of transit centers poses a great unbridled difficulty. We do not know if the rail will even finish at this point. It seems that again, we should stick to boundaries and guidelines. That is, if a transit center is in a rural area, then growth has to be minimal. In fringe areas, more development. However, this section seems not to distinguish where these transportation hubs will be located and that is the problem.

Your truly,

Joan Koff
May 8, 2017

HHF Planners
ATTN: O‘ahu General Plan
733 Bishop Street, Suite 2590
Honolulu, HI 96813
EMAIL: gp2035@hhf.com

Re: Comments on the Second Public Review Draft O‘ahu General Plan

Aloha,

Thank you for this opportunity to comment on the Second Public Review Draft O‘ahu General Plan. The comments in the following pages are intended to be specific, with references to specific sections being commented on, provide suggestions for alternative wording where appropriate, and an explanation of the reasons for each comment and proposed change to the Draft O‘ahu General Plan.

My suggestions for alternative wording appear as follows: Using the text from the “Draft O‘ahu General Plan – WITH PROPOSED CHANGES SHOWN”, text proposed to be added is shown underlined in green color, and text proposed to be deleted is shown in strikethrough format in red color.

**Section 1**

“The General Plan for the City and County of Honolulu is a comprehensive statement of objectives and policies which sets forth the long-range aspirations of O‘ahu’s residents and the strategies of actions to achieve them. It is the first tier focal point and lays the foundation for a comprehensive planning process that addresses physical, social, cultural, economic and environmental concerns affecting the City and County of Honolulu. This planning process serves as the coordinative means by which the City and County government provides direction to accommodate for the future growth projected for O‘ahu, of the metropolitan area of Honolulu.”

**Reasons:**

The proposed changes weaken the O‘ahu General Plan. Because this document expresses the aspirations of the residents of O‘ahu, it should be primary in all considerations, not “the first tier” of a process where other tiers and agendas override our aspirations. In addition, because the aspirations of the residents of O‘ahu include a high quality of life, clean waterways, and open spaces where the natural environment is protected and preserved, this plan is not to “provide direction to accommodate [all] future growth.” The people who live here like O‘ahu the way it was, and that means at some point we will need to limit and stop growth, not continually accommodate it, or else we will lose the quality of life we love through too many people pressed together in small spaces, no open space, no natural environment; we’d become another Hong Kong.
Sections 2 and 3
Delete both sections 2 and 3.

**Reasons:**
These processes may change over time. As the O‘ahu General Plan expresses the aspirations of the residents of O‘ahu, it is our primary long-term document guiding all development decisions. This should not change because we should never lose sight of or give up what we want in terms of quality of life and the surrounding environs we live within. If we do, we will very likely lose everything we value and hold precious about living here.

Section 4
“Since the adoption of the General Plan in 1977, various plan [as and amendments have been made over the years, including this update, were subsequently adopted in 1979, 1982, 1985, 1987, 1989, 1990, 1991, 1992, 2002 and 2017 [or whatever year any current changes are passed]. However, in spite of these changes, the basic themes and directions for growth remain valid, and require continued pursuit.”

**Reasons:**
Keep these years specifically noted in the General Plan document. They provide useful historical information that will help our residents more readily reference records of when changes were made and what those changes were. Do not dilute the usefulness or potency of the General Plan document.

Sections 5, 6, and 7
Do not delete sections 5 and 6. Leave sections 5, 6, and 7 in the General Plan as currently written, and just update the year or years in section 7 as appropriate.

**Reasons:**
Not sure the reasons these sections were proposed for deletion, but the activities described for the Department of Planning and Permitting are desirable and we hope they continue to be done for the people of O‘ahu.

Section 9
Make no changes to paragraphs 1 and 2. The proposed changes to paragraph 3 are good.

**Reasons:**
No need for the changes in paragraphs 1 and 2, but the proposed changes to paragraph 3 helps provide consistency throughout the document on the main areas of focus of the General Plan.

Section 13
“A future which is sustainable is also of great importance for an island community interested in the current and future well-being of its people. The principles of sustainability recognize that there are limits to the complex network of systems (environmental, economic and social) that define our lifestyles and our overall well-being. A sustainable Honolulu would have not exceed the O‘ahu’s capacity to support the current generation’s demand and use of its resources without compromising nor compromise the ability of future generations to meet their own needs. To do this, the City and County shall seek to find the
appropriate balance and synthesis of the major elements of sustainability that are essential to the creation of a sustainable place:

- environmental protection
- economic health, and
- social equity.”

Reasons:
As worded the section can be misconstrued. The suggested changes are intended to keep a sharp focus on what we need to do and also not do in order to achieve sustainability.

Section 14
“As the 21st century continues to unfold, the movement to foster sustainability will influence decisions about future land use, growth, and economic development on O’ahu. To achieve sustainability requires recognition of the relationships and linkages between all resources within defined boundaries, similar to the value system of traditional Native Hawaiian land use management and contemporary watershed management. It requires active stewardship of the island’s limited natural resources, and consideration for the health of the environment and the economy, in relation to the community’s overall well-being. Objectives and policies that support the major elements of sustainability are interwoven into each of the 11 areas of concern. Examples of what sustainability means in practice are:

- careful monitoring and efforts to control of population growth on O’ahu through City & County policies that encourage open discussion of the very serious problems of overpopulation and encourage residents to limit the size of their families
- passage of laws and regulations that require anyone to have resided in Hawai‘i no less than 10 years before they can own property
- compact and mixed-use development patterns that encourage higher densities and conserve energy
- preservation and protection of agricultural, natural, and open space resources
- multi-modal transportation networks and transit-oriented developments to reduce automobile use
- energy-efficient building design and technology to reduce energy consumption
- greater public awareness and actions to reduce waste and excessive consumption
- greater recycling and waste stream reduction
- use of renewable energy sources to reduce dependence on imported fossil fuels where economically and environmentally appropriate
- greater consumption of locally-grown food and locally-produced products,
- economic diversification that emphasizes the well-being of O‘ahu’s residents and is resilient to changes in global conditions, and
- greater awareness that the collective “social capital” within communities is vital to maintaining a strong and productive society.”

Reasons:
To effectively achieve sustainability, we have to think outside the box, beyond the norms of current thinking, and we have to take real steps to address current the population pressures and preempt future problems.

Without actively working towards achieving a population that O‘ahu can more readily sustain, all talk of sustainability is hollow and doomed to failure. Quite a few of the big problems our society faces today are created by population pressures and would resolve themselves with lower human population.
The reason we need the passage of laws and regulations that require anyone to have resided in Hawai‘i no less than 10 years before they can own property is to give people who live on O‘ahu a better chance to own property. Today, people who do not live in Hawai‘i outcompete current O‘ahu residents in the purchase of property. When these non-residents move here, that also increases the island population. The 10-year residency requirement for people wanting to own property would also help manage population growth on O‘ahu.

**Section 16**

“POPULATION

The population objectives and policies encompass two three distinct thrusts. The first is: First, to control population growth to the extent possible to avoid social, economic, and environmental disruptions. Second, to plan for anticipated future population growth in a manner that considers the limits of O‘ahu’s natural resources, that protects the environment, and that minimizes social, cultural, economic and environmental disruptions. The second is: And, finally, Third, to maintain a pattern of population distribution that will allow people to live, and work, and play in harmony. The map at the end of Chapter 1 conceptually shows the development pattern on O‘ahu in relation to Policy 4. The distribution of residential population percentages in Policy 4 and the map are not regulatory, but are guides to population growth in each of the DP and SCP areas.”

**Reasons:**

The first item in section 16 is vital for both immediate and long-term sustainability. Do Not Delete This Item! The last two sentences of section 16 are unnecessary and narrow things down too much. Better to keep section 16 broad in its declarations in order to maintain clarity of direction to present and future generations, and also to keep the long-term viability of this document. The last two sentences present problems to realizing that goal.

**Section 20**

“The objectives and policies for housing seek to ensure a wide range of housing opportunities and choices; to increase the availability of affordable housing; higher-density housing via mixed use and transit-oriented developments; to increase the use of sustainable building designs and techniques; to reduce inflationary speculation in land and housing; and address issues associated with homelessness so that all people have shelter. provide a choice of living environments, affordable housing, and a reduction of inflationary speculation.

**Reasons:**

Delete “higher-density housing via mixed use and transit-oriented developments.” The purpose of Mayor Caldwell’s push to develop rail at all costs may well be to open up agricultural and other lands to new development. Such development encourages more population growth and is not conducive to our long-term natural resources (including land) sustainability and economic sustainability. The operational costs of rail will permanently raise the cost of living on O‘ahu and that does not help the island’s residents.

We must think outside of the prevailing thinking on mass transit and rail. Investing in expanding our fleet of cleaner, fuel-efficient buses to cover more of the island with frequent availability of buses is of the highest importance for our long-term sustainability.
Section 21
Make no changes to the wording of the current general plan for section 21.

Reasons:
Rail is not less dependent on fossil fuels, it is just as dependent on them. As the rail uses electricity, which is generated by the Hawaiian Electric Company, which uses fossil fuels to generate that electricity, rail is and will be entirely fossil-fuel dependent.

Section 24
“PHYSICAL DEVELOPMENT AND URBAN DESIGN
Physical development and urban design is concerned with the quality of growth that occurs within the various parts of the Island. The objectives and policies in this area of concern deal with the coordination of public facilities and land development, compatibility of land uses, and specification of certain land uses at particular locations. It also deals with creating active, vibrant communities linked not only physically but digitally and through social media and other forms of technology to promote public participation in the planning process to create not only a better society but a digital society. New policies emphasize the need to recognize and prepare for the long-term impacts of climate change.
Urban design emphasis is contained in objectives to create and maintain attractive, meaningful, and stimulating environments and to promote and enhance the social and physical character of O‘ahu’s older towns and neighborhoods. Given the population distribution reflected in the General Plan, it is intended that rural centers be allowed to grow in an organic fashion, providing for generations to remain in their home towns and maintain the economic viability of our rural and suburban communities.”

Reasons:
The meaning and purpose of including the last sentence in paragraph 1 of section 24 is not clear. If it means that rural centers grow into urban areas then I disagree and would have the sentence removed. The community desires that few precious rural areas we have left on O‘ahu remain rural.

Section 38
“Citizen Participation
Individual citizens and citizens’ community groups should participate freely to help bring about the success of the General Plan. …”

Reasons:
The wording here should remain “citizens’ groups.” “Community groups” comprised of people who are not citizens should not have the right to determine the direction the city takes in terms of the O‘ahu General Plan. This right should be reserved for actual citizens only.

Section 39
No change to section 39 of the current General Plan.

Reasons:
No particular objection to the change proposed to section 39, but in general if it’s not broke, don’t change it.
Section 46
Delete this proposed new section.

Reasons:
1) It is not needed. 2) “The City and County recognizes the need for close collaboration among the public and private sectors in order to meet the objectives of the General Plan,” sounds like permission for the City to collude with private developers, the construction industry, unions, and banking interests. We definitely don’t want that. Enough of that has already gone on with the rail project, and that has not been good for the citizens of Honolulu at all, resulting in unbelievable cost overruns, distrust of city officials, and resentment towards the private interests who are pushing the rail project at all costs.

Section 49
Also, whenever revised population projections include an extended time horizon, the General Plan will be re-evaluated to ensure that its objectives and policies remain valid for the extended planning horizon, amended to maintain a planning horizon of approximately 20 years.

Reasons:
Not sure of the reason for this proposed change, but the more specific clarity of the existing wording of section 49 of the General Plan is preferred.

Section 51
The City’s directed growth policy is stated in Chapter I (Population), Objective A. Policies 1 through 3 define the growth policy, and Objective C Policy 4 illustrates it. Policy 4 is intended to guide the preparation and amendment of development plans by providing a population distribution outcome that is consistent with the directed growth policy.

All policy statements and the “% of total” figures in the population distribution table contained in this Plan are intended to serve as policy guidelines, as opposed to rigid requirements, in the preparation and amendment of Development Plans and agency plans, programs, and projects.

Reasons:
See discussion of sections 52 – 69 on the following pages.

Sections 52, 53, 54, 55, 56, 57, 58
Do Not delete these sections as currently proposed. Sections 52 – 58 should remain intact as they are written in the current O‘ahu General Plan. The only changes that should be made are, only if necessary, any references to State and Federal programs if those references are no longer valid.

Reasons:
Keeping this wording is of the greatest importance. These sections clearly state our aspirations and provide a concrete method for steps toward achieving these goals and, most importantly, the benefits that the people of O‘ahu will enjoy as a result of not being overpopulated like Hong Kong and other problem urban scenarios we see unfolding around the world.

In fact that some of these policies, like Policy 5: Encourage family planning {Section 57}, and Policy 6:
Publicize the desire of the City and County to limit population growth (Section 57), should be more vigorously pursued and more explicitly promoted in city communications and actions. These policies have not been expressed enough.

Deleting sections 52 – 58 and replacing these policies with some of those that follow in sections 59 – 69 appear to be an attempt by some individual or groups of private interests to condone and encourage population growth. Who would benefit from that? Those that most immediately come to mind are real estate developers, construction interests, banking interests and the myriad of businesses and groups that provide services to these interests. In many, many ways, their desires to make money off of Hawai‘i and O‘ahu contradict the aspirations of many if not most other O‘ahu residents who live here out of a desire to experience and enjoy a certain quality of life that O‘ahu once had that was considered desirable. If these business interests succeed in building more buildings, resorts, etc., this will spoil any chance for those who have aspirations to retain more of the island’s natural beauty, its respite from the world’s overpopulated places, and its physical manifestations of the Native Hawaiian culture.

For these reasons, in providing guidance on the future of O‘ahu, the O‘ahu General Plan should retain sections 52 – 58 as they are written.

**Section 59**

“Objective A **Objective B**

To enact policies that curb and reduce future population growth where necessary to prevent problems of overpopulation.

To plan for any unavoidable future population growth in a manner that considers the limits of O‘ahu’s natural resources, that protects the environment, and that minimizes social, and cultural, and economic disruptions.”

**Reasons:**

To maintain the high quality of life on O‘ahu and avoid the social, cultural, and natural resource problems that we will undoubtedly face with overpopulation, it is essential that we begin today to acknowledge that the time to enact policies that will gently begin curbing population growth on O‘ahu is now. We must acknowledge this in all planning documents and policies and begin acting to curb the in-migration population growth, as well as begin discussions on family planning, including having families of not more than one or two children.

It is important that we do this now so that we do not find ourselves in a situation similar to that faced by China in years past where they were forced in implement strict policies on family size in order for their people to survive with the resources that they had.

**Section 61**

“Policy 2

Provide adequate support facilities to accommodate **future growth in the current** number of visitors to O‘ahu, and begin implementing policies that reduce future growth of visitors in a manner that minimizes social, and cultural, and economic disruptions.”
Reasons:
We cannot grow forever, even if we wanted to. If we continue to push the island’s limits, there will be so much momentum built up in the growth of population and visitors, there will be real difficulties in achieving a sustainable balance again in the future.

Sections 62, 63, and 64
“Policy 3
Seek a balanced to reduce the pace of physical development such that any development or re-development, is in harmony with the county’s environmental, social, cultural, and economic goals by effecting and enforcing City and County regulations.

Policy 4
Establish geographic growth boundaries to accommodate future population growth while at the same time protecting valuable agricultural lands and open space from development.”

Policy 5
Encourage family planning.

Reasons:
These changes are recommended for consistent application of policies and actions that will help us sustain a desirable living environment on O‘ahu in the future.

Section 65
“To establish a pattern of population distribution that will allow the people of O‘ahu to live, and work and play in harmony.”

Reasons:
To be consistent with not deleting sections 52 – 58, as discussed on pages 6 – 7 of this document.

Section 66
“Policy 1
Facilitate the full development of the primary urban center through higher-density redevelopment and the provision of adequate infrastructure.”

Reasons:
Most of the people I’ve talked to over the past two years, including doctors, accountants, and people who work in government and private industry, all say they do not like what is happening on O‘ahu right now. They say there is too much construction, too many tall buildings blocking our once nice view planes, too many people coming in. You can even feel it is more crowded now than it was 11 years ago. They all say they do not want higher density development. The only exceptions I have found to this sentiment are people who work in real estate development, construction, banking, and those who provide business services to these entities, but they do not represent a wide enough cross section of our population to say that they represent the community. The people in these groups, though they allocate real dollars, loan or hire people out to government offices, and pay people to spend work hours trying to be heard more at government decision-making meetings to influence government decisions on building and development,
they are a select group and do not represent the community as a whole. This makes them special interests, and special interests rarely look out for the aspirations of all residents, which the O‘ahu General Plan is intended to do.

For the reasons stated above, section 66 is recommended to remain as is in the current O‘ahu General Plan. Do not add the proposed new text.

Section 68

“Policy 3

Manage land use physical growth and development in the urban-fringe and rural areas so that:

a. development is contained within growth boundaries; an undesirable spreading of development is prevented; and

b. population densities in all areas remain consistent with the character and the culture and environmental qualities desired for each community, their population densities are consistent with the character of development and environmental qualities desired for such areas.

Reasons:

The changes proposed to section 6 fundamentally alter the aspirations set forth in the O‘ahu General Plan, possibly as an attempt to give green light to greater urban development of the island. These proposed changes do not support a desirable O‘ahu environment, in fact, they are counter to it.

We are not seeking to manage land use, we want to manage physical growth. You should not be deleting sub-item a. “an undesirable spreading of development is prevented;” because such urban spread is, in fact, undesirable for the majority of people who choose to live on O‘ahu and visit here. Availability of Hawai‘i’s natural environment, what the world population has deemed some of the most spectacular environs on Earth, is what people desire. So intense, dense urban development is actually undesirable and the O‘ahu General Plan is correct in stating that.

As for sub-item b. it appears that the proposed change tries to remove the intention to maintain “the character of development,” perhaps to allow for more development, and denser development.

Keep section 68 as it currently is in the O‘ahu General Plan, as accurate expression of our aspirations. If you don’t think this is true, please ask yourself, would you like to live in a Honolulu that is built up like Hong Kong? If so, please note that others do not. That is why they want to visit here and move here in such vast numbers – exactly because O‘ahu, until just recently, has not been like Hong Kong.

Section 68

“Policy 5

Foster a healthy business climate by reducing regulatory barriers that are burdensome, redundant, and costly to small businesses, and by encouraging complementary policies that support access to capital and markets and protection of the natural environment.”

Reasons:

I am very, very leery about reducing regulations. Each regulation went through our governmental process, with comment from people. Each was put in place for a reason. If that makes businesses operate more responsibly, then that is just fine.
Recommendation: Implement Policy 5 as shown above, or keep this proposed change out of the O‘ahu General Plan altogether.

Sections 86, 87, and 88
Do not delete these sections, as is currently proposed in the Draft O‘ahu General Plan.

Reasons:
The current Policies 3, 4, and 5 of the current O‘ahu General Plan each represent an important aspect of creating and maintaining a quality of life that is desirable for all people who visit and reside on O‘ahu.

Re: “Policy 3 - Encourage private participation in improvements to facilities in Waikiki.” Why would we not encourage private participation in improvements to facilities in Waikiki?

Re: “Policy 4 - Prohibit major increases in permitted development densities in Waikiki.” Why would we not prohibit these major increases? The community outcry over the recent Ritz-Carlton developments illustrates that the people who desire a more densely developed Waikiki are developers, the construction industry, and related interests; not residents, and not visitors who come seeking an exotic Hawai‘i experience.

Re: “Policy 5 - Prohibit further growth in the permitted number of hotel and resort condominium units in Waikiki.” This is good planning, and the current O‘ahu General Plan is correct in stating this clearly as it does reflect the aspirations of the residents of Hawai‘i, with the exception of developers, the construction industry, banking, and business interests that have a special interest in trying to make more money, not in creating or preserving a desirable and sustainable quality of life on O‘ahu.

Sections 90 and 91
“Policy 7 Policy 6
Facilitate Permit the development of the following secondary resort areas: Ko‘Olina Resort, in West Beach, Turtle Bay Resort, Kahuku, Hoakalei Resort at Ocean Pointe, Makaha Valley, and La‘ie.

91. Policy 7
Manage the development of secondary resort areas in a manner which respects existing lifestyles and the natural environment, and avoids substantial increases in the cost of providing public services in the area.

Reasons:
Do not delete section 91 from the current O‘ahu General Plan. It correctly and clearly provides a way to achieve our aspirations for a desirable and sustainable quality of life on O‘ahu.

On the other hand, the proposed section 90, which would replace the current text of the O‘ahu General Plan identified as section 91, is counter to this. Further development in these other resort areas will destroy the very thing that makes them desirable places to visit, and keeps tourists paying money to travel here. Don’t destroy the geese that lay the golden eggs.
**Section 97**

“Policy 1

Foster a positive business climate for agricultural enterprises of all sizes, as well as innovative approaches to farming as a business. **Assist the agricultural industry to ensure the continuation of agriculture as an important component of O‘ahu’s economy, source of income and employment.**”

**Reasons:**

It seems that this proposed change attempts to lessen the responsibility of the City & County of Honolulu to preserve agriculture on O‘ahu.

Agriculture is a vital element for both a desirable and sustainable life on O‘ahu. We don’t have the luxury of assuming that we can import our food. That is very short-sighted and a recipe for disaster.

Recommend the current language of the O‘ahu General Plan identified above as section 97. Do not let anyone suggest that you should attempt to side-step the need to protect and sustain agriculture on O‘ahu.

**Section 102**

“Policy 4

**Provide sufficient agricultural land in ‘Ewa, Central O‘ahu, and the North Shore to encourage the continuation of sugar and pineapple as viable industries large-scale agricultural activities that are vital for food security on O‘ahu.”**

**Reasons:**

Do not delete section 102. How can we expect to implement the aspirations outlined in “Chapter II: The Economy” without sufficient agricultural lands? Who proposed deleting this? Are we trying to open up our agricultural lands for urban development? Instead, adopt the suggested amendment above. We cannot import all of our food on the hope that there is not a war or oil crisis or some other events that would prevent food from being delivered to the island. We need to have some base of agriculture and food security right here on O‘ahu.

**Section 104 and 016**

Do not delete section 102 or section 106. Keep them as currently written in the current O‘ahu General Plan.

**Reasons:**

See the reasons given for section 97 and 102 above.

**Section 109**

“Policy 8

**Prohibit the urbanization of high-value agricultural land located within or outside the City’s growth boundaries.”**

**Reasons:**

Food security is too important an issue to skirt around, as the proposed amendment to section 109 in the Draft O‘ahu General Plan now attempts to do. The proposed amendment highlighted in yellow is suggested as a far better policy to achieve our goals, needs, and aspirations for life on O‘ahu.
Sections 167 and 168

“Policy 9
Encourage the replacement of low- and moderate-income housing in areas which are being redeveloped at higher densities.”

“Policy 9
Encourage the preservation of existing housing which is affordable to low- and moderate-income persons.”

Reasons:
If we go in this direction and replace our neighborhoods with high-density condominiums, etc., O’ahu is going to disappear under a sheet of concrete and asphalt. Already people are cutting down all the trees on their properties and covering over any green space with corner-to-corner houses and multi-unit dwellings (both legal and illegal).

What is the purpose of this General Plan? To find any solution to the pressures of immediate short-term problems? Or to design a place to live that we truly desire?

If you build more high-density housing, etc., to solve current population discomforts, you will only be administering a Band-Aid fix which covers up the symptoms for a while, while the real problem (overpopulation) gets worse, and will re-emerge again later worse than ever before.

To sustain a high-quality of life, we must start reducing development and curbing population increases in the ways that are described in sections 52 – 59, which are currently proposed for deletion.

Section 170

“Policy 11
Encourage the construction of affordable homes within established low-density and rural communities by such means as ‘ohana’ units, duplex dwellings, and cluster development that embraces the ohana concept by maintaining multi-generational proximity for local families.”

Reasons:
We should not be allowing development in rural areas, because that is just letting the nose of the camel into the tent. It is well established that development happens with an innocuous little change here and there and those changes eventually allow for or result in loss of rural land to urbanization. The O’ahu General Plan needs to create firm polices against that sort of thing happening.

Section 171

“Policy 12
Promote higher-density, mixed use development, including transit oriented development, to increase the supply of affordable and market homes convenient to jobs, shops and public transit.”

Reasons:
Preserving what is left of O’ahu’s character and quality of life requires that we should not be allowing for higher-density, mixed use development, including transit oriented development.
Section 179
“Policy 2
Discourage speculation in lands, private developers from acquiring and assembling land outside of areas planned for urban use.”

Reasons:
Please don’t water these policies down; leave section 179 as is. This looks like construction industry people, or someone who tries to make money in these construction suggested this proposed revision, but individuals from such organizations do not represent all the people of O’ahu.

Leave section 179 as is.

Section 183
“Policy 5
Prohibit the selling or renting of government-subsidized housing for large profits.”

Reasons:
Keep this in the General Plan, do not delete. It is too important an issue to not be addressed directly and clearly. Deleting this item from the General Plan will result in less than sufficient emphasis on this issue in the O’ahu General Plan.

Section 189
“Policy 5
Support mixed-use development and higher-density redevelopment in areas surrounding future rail transit stations.”

Reasons:
Keep this kind of thinking out of the General Plan. Rail is too expensive and should not be completed. It will raise the cost of living on O’ahu permanently, and most residents can ill-afford that.

Section 201
“Policy 5
Support the rail transit system as the transportation spine for the urban core, with links to the airport and cruise ship terminals, which will work together with transit oriented development to reduce automobile dependency and increase multi-modal travel.”

Reasons:
It may seem like a neat thing from the urban planning perspective, but the cost of building and then operating rail are too high. We are far better served by having more buses that cover more of the island, with more regularity throughout the evening and early morning hours, as well as during the working hours of the day.
Section 206
Policy 7
Promote the use of public transportation as a means of moving people quickly and efficiently, of conserving energy, and of guiding urban development

Reasons:
Why on Earth would we ever delete a section like 206? Promoting the use of public transportation is good for the people of O‘ahu.

Keep section 206 in the O‘ahu General Plan.

Sections 277 and 278
Keep section 278 as is present in the current O‘ahu General Plan. Do not replace it with section 277 as proposed in the Draft O‘ahu General Plan.

Reasons:
Section 278 provides clearer priorities and does not threaten to infringe on other sections of the O‘ahu General Plan the way the proposed wording of section 277 does with its emphasis on “new growth areas.”

Section 280
Keep section 280. Do not delete is as proposed in the Draft O‘ahu General Plan.

Reasons:
Section 280 provided clearer guidance. Eliminating it can create more problems from multiple construction projects that drive up the overall cost of construction on O‘ahu. Without phased construction, we have no way of assessing the overall impact of new developments before approving more new developments.

Section 282
Do not implement the proposed section 282 in the Draft O‘ahu General Plan.

Reasons:
Higher density development is more development and at some point we need to begin curbing this trend. Higher-density development may be ok of it does not encourage in-migration of more people which increases the island population, but to encourage such development may be inviting problems.

Section 284
Do not implement the proposed section 284 in the Draft O‘ahu General Plan.

Reasons:
We cannot afford rail. Rail should never have been allowed to pass. The politics surrounding the approval of rail have been very suspect, so the benefits we have been promised are likewise suspect.
Rail will only encourage more new development, which will further deteriorate the unique environment of O‘ahu, which goes against so many of the policies and aspirations already stated in the O‘ahu General Plan.

**Section 299**
Keep section 299 of the current O‘ahu General Plan, do not delete it as is proposed in the Draft O‘ahu General Plan.

**Reasons:**
To preserve view place, open space, airflow, and natural lighting, we need low-rise multi-unit housing, and fewer tall buildings. The quality of life for all people is better achieved through low-rise development. This does mean that O‘ahu has to forego some growth in population and some high tower buildings, however, such high-density developments put greater stress on our energy production (e.g. electrical) capabilities, and water resources. Thus, higher-density development that overshoots sustainable use of our island resources should not be allowed.

Thank you very much for this opportunity to provide comment on the Draft O‘ahu General Plan. Should you have any questions about my comments and recommendations I welcome phone calls or e-mails, especially if there are details which are unclear in my writings.

With warmest Aloha,

Andrew Laurence
TO:
Oahu General Plan comment deadline May 8th, Monday
City and County of Honolulu, Department of Planning & Permitting
650 So. King St., Honolulu, HI 96813

HHF Planners
ATTN: Oahu General Plan Update
733 Bishop Street, Suite 2590
Honolulu 96813

OAHU GENERAL PLAN DECIMATES NATIVE HAWAIIAN CULTURAL PRACTICES

Aloha,

To sum it up, the Oahu General Plan (OGP) as presented lacks critical data to properly carve up the island for specific land use endeavors.

First, an island wide survey of where our endangered and threatened flora and fauna are located, and an idea of how many of each specie are left at these locations must be made known and included in the decision making process.

The eminent loss of habitat for the endangered Hawaiian Duck, Coot, Hoary Bat, Hawaiian Owl (Pueo), and various species of endangered bees, migratory birds, and various species of insects on the verge of extinction is missing from the OGP map.

MISCHARACTERIZATION OF THE INNER COASTAL WETLANDS OF THE EWA PLAIN

The Environmental Impact Statements (EIS) reviewed by the State Land Use Commission, Planning Commission, and the State’s Department of Land and Natural Resources (DLNR), contained a bias when liquidating preservation and farmlands for development. The bias was, that for decades, specific endangered bird species on the Ewa Plain were extirpated long ago via extensive farming practices and the encroachment of dogs, cats, mongoose, cane toads, and other noxious and or invasive plants.

During the inventory process to convert property on the Ewa Plain, it was a given that the person hired to do the inventory (EIS) for the property had a prearranged misconception of a scenario and concluded from the onset, that the property in Ewa once used as farmland, was now “wasteland.”

In each EIS undertaken (excluding the Red Ilima for the North South Road), it was concluded that no animals or plants of significance were or could be on the property or in need of
preservation or protection due to the adverse pre-conditions (farming practices) on the property that existed for decades.

In every EIS produced to develop the Ewa Plain, the conclusion or findings were that endangered birds no longer frequented or utilized the area due to intensified farming practices that extirpated the birds from the property. The portrayal of the land on the Ewa Plain was always characterized as land that was disposable and held no worth to endangered birds due to the wild dogs, cats, rats, mongoose and cane toads that took over and ravaged the environment for Pueo beyond repair.

**MIGRATORY AND ENDEMIC BIRD SPECIES OMITTED IN LAND USE SURVEYS**

In 2017, the Hawaii State Senate passed Senate Resolution 6 (SR 6 SD1 http://capitol.hawaii.gov/measure_indiv.aspx?billtype=SR&billnumber=6&year=2017) on the grounds that knowing what habitat remains for the Pueo on Oahu is of value. At this time, the State of Hawaii and the City and County of Honolulu have no data as to where, how many, and of what health the population of Pueo remaining are in… meaning, the status of Pueo on Oahu is completely unknown until such data comes forth.

In addition to not knowing how many Pueo are left on Oahu and where they may still be, Hawaii’s State Senate in 2017 introduced Bill 570 (http://capitol.hawaii.gov/measure_indiv.aspx?billtype=SB&billnumber=570&year=2017) to address this unknown. The intent of SB57 was to enhance the survey process for locating and identifying Pueo in order that during the EIS exercise, a more adequate and thorough search for endangered Pueo would take place.

As it stands, the Office of Environmental Quality Control accepts and approves of protocol to search for endangered plants or animals that involves a mere few hours on the grounds. For example, in the liquidating of 500 acres of prime agricultural land in Ewa in order to construct the University of Hawaii West Oahu Campus, the inventory to search for Pueo on the property within the EIS transpired for just a few morning hours on one day. One person concluded in their few hours of search, that the 500 acres was void of any Pueo. SB570, if passed, was to mandate the inventory for Pueo take place for a minimum of five days.

Obviously, to make the determination that absolutely zero Pueo existed on the entire Ewa Plain, and that all Pueo were extirpated within the scope of the Second City, it was necessary to advance faulty EIS’s, allow flawed protocols to be administered, and permit the scientific observations actually taken on the grounds themselves, to be skewed with misconceptions.

The evidence to substantiate that the EIS’s performed for the entire Ewa Plain were wrought with fraud, laden with ill-will, done with deceit, and carried out with malfeasance to cause harm to the Pueo, are captured in the videos provided for proof- (see list of videos pasted below).

Remember now, all seventy-six Hawaii State Legislators, the Governor of Hawaii, the Mayor of Honolulu, and the entire Honolulu City Council all claim in unison, in totality, that there are absolutely no Pueo remaining alive in all of Ewa.
What do these videos communicate to you- what do you see in them? If you see and conclude that there indeed are Pueo in these videos, then by law, a Supplemental EIS is supposed to be triggered and a Habitat Conservation Plan (HCP) executed for the Pueo by the DLNR.

**PUEO HABITAT CONSERVATION PLAN COMES FIRST**

Until the State of Hawaii’s Department of Land and Natural Resources has concluded its islandwide survey of Pueo, it would be negligent and inappropriate for the City and County of Honolulu’s City Council to codify and approve of the current OGP as presented.

A *Pueo Sanctuary, Pueo Park, Pueo Refuge, Pueo Preserve*, or designated territory for the endangered specie in some fashion, must be identified first and foremost and included in any OGP that is brought forward for adoption.

Until a HCP is executed for the Pueo within the Honouliuli Ahupua'a where I practice my Native Hawaiian Cultural Practices, the OGP stands to extirpate the Pueo and this must be prevented.

Sincerely,

Michael Kumukauoha Lee  
Native Hawaiian Cultural Practitioner  
Recognized Cultural Descendant in ‘Ewa  
Ewa Beach Hi. 96706
(Chronologically List- Video Evidence of the Ho’opili /UHWO Pueo):

Attachments area

Preview YouTube video HONOLULU RAIL MEETS PUEO; CITY DENIES OWL EXISTS

Preview YouTube video PUEO SEEKS REFUGE ON THE EWA PLAIN

Preview YouTube video The Faceless Pueo @ UHWO
Preview YouTube video PUEO HUNT @ UHWO

Preview YouTube video PUEO @ UHWO ASKS DIRT BIKERS TO CEASE AND DESIST

Preview YouTube video PUEO HUNT EAST KAPOLEI RAIL TRANSIT STATION
Preview YouTube video THREE PUEO OBSERVED UHWO 9/29/16

Preview YouTube video Three Pueo Emerge at Sunset on October 7, 2016 @ University of Hawaii West Oahu Campus

Preview YouTube video No Reprieve For Pueo @ UHWO
Preview YouTube video PUEO & MATE TEAM UP AGAINST RAT

Preview YouTube video PUEO WINTER SOLSTICE 2016

Preview YouTube video Pueo Observed Hunting from 4-5am - and 7-8pm For Best Viewing
Preview YouTube video Pueo Courting Before Sunrise and One Appears After Sunset

Preview YouTube video Pueo & Barn Owl 2.15.17 Side by Side Thick & Thin

Preview YouTube video PUEO COMES OUT TO PROTEST TRANSIT ORIENTED DEVELOPMENT
For significant consideration!!
Population distribution is very important. To increase the population % mix for the North Shore is a bad idea. Serious “Quality of life” issues surface when there is insufficient infrastructure [over crowded roads, few turnouts, few public restroom, not enough adequate parking at Parks, fully functional Parks with long lists of differed maintenance, foot erosion at beaches, municipal waste water treatment facilities, etc., etc. … the list is long]. The North Shore not only has its resident population but/and is also the most popular destination for our tourists out side of Waikiki. With over half of the visitors to Oahu visiting the North Shore annually it adds millions to our de-facto population and infrastructure impacts. The North Shore is basically agricultural/open space, some residential [mostly with no municipal waste water treatment], some business, and a heavy focus on the areas recreational attributes.
Please consider maintaining the % mix that has been in the General Plan …. or reduce it. Let the urban core be the urban core … lets Keep the Country Country. Mahalo, Bob Leinau
The consolidated city-county was established in the city charter adopted in 1907 and accepted by the Legislature of the Territory of Hawai‘i.

The first General Plan was adopted in 1977

The General Plan (1992 edition, amended in 2002) is intended to be a dynamic document, expressing the aspirations of the residents of Oahu. It sets forth the long-range objectives and policies for the general welfare and, together with the regional development plans [Now called Community Sustainable Plans], provides a direction and framework to guide the programs and activities of the City and County of Honolulu. In preparing the statement of objectives and policies, the fair distribution of social benefits was held to be of paramount importance. Although a general plan it should have more specifics and numbers so that it is not just a collection of statements.

Another way of saying this is that, if there is not an accommodation [or if there is an incompatibility] for some development in the General Plan then it should not happen.

General Plan should actually be reviewed every ten years ... obviously sometimes it takes longer.

The biggest problem that I have seen over the years that many of our planning documents say things that both support a proposed project and state reasons why it should not happen. These internal contradictions and/or ambiguity makes it hard for the staff of our permitting agencies. [i.e. discourage urban sprawl and encourage housing &/or economic development do potentially conflict]. It tends to put issues up for debate that become political in nature and do not serve harmony in communities. The General Plan can be amended by actions of the City Council. They also decide on issues where in a conflict arises. Less ambiguity/contradictions makes it easier on everyone.

The next biggest problem is that many of the wonderful things that his plan references require funding. Getting funding for projects on the North Shore has been an ongoing problem. There is mention of prioritizing CIP funding in some areas. I am not sure that this can be handled equitably. ... as well as indicate the sequence in which development will occur.
One of the concerns that many people have is how will the General Plan revisions affect the population on the North Shore in the future. The State DBEDT should go back to making population predictions with refinements down to the one tenth of a percent. Rounded up percent population numbers significantly impacts rural areas with the least ability [infrastructure] to adsorb these numbers. The numbers need to take into account the daily de facto population caused by TVA and visitor traffic. The sequencing of growth very much needs to occur in concert with the infrastructure. Many areas on the North Shore have serious traffic daily. Further suggesting that the visitor market might best be integrated into zoned residential areas is not really fair to people who bought into residential areas. And, one of the biggest impacts is that the units in the residential areas are not available to rent to residents who grew up here because they are priced out by the tourists. Population should be "controlled" which is a higher level of word usage than "managed".

Oppose the promotion of higher density and mixed use development as a policy for all areas regardless if the community is rural and not in the Sustainable Communities Plan. The Revised General Plan should not create any conflicts with the approved Sustainable Communities plans.

The 11 areas of concern should be looked at again. The uncoupling of "Recreation" and "Cultural". They seem to have more that are not in common.

"Agriculture" is a big deal on Oahu and deserves its own set of considerations [out from under just economic]. Recommend language supporting farms and farming along the windward, North Shore, Waianae coasts that was in the original OGP. We support the protection of all farms from urbanization, not just IAL designated land

Sustainability is a big deal as is the IAL designation. Enforcement of conservation Plans and Best Management Practices is very important. Also there should be some metric tied to some percent of food production grown on Oahu to be sold in Hawaii ... not just seeds for pig food for a farm in the midwest.

Recommend that Housing and Communities Page 10, #20 be deleted. It implies that Transit oriented developments are desired and appropriate for all communities on O'ahu. The bus stops are our only 'transit' stations in Ko'olauloa. Island-wide there are 3,837 bus stops. Few places are appropriate for TOD.

Oppose all changes to the Urban Growth Boundaries at Malaekahana ahupua'a in Ko'olauloa in particular ... to and including a resort designation. This is not a resort destination it is college town with strong religious under pinning's.

Support a carrying capacity study for O'ahu population.
Population, Objective A, policy 2. Since none exists and sea level
The May edition of the National Geographic has an interesting article of the "World's Top Cities for People and the Planet" it might create some interesting compare and contrast perspectives that could help Honolulu move forward from a global perspective.

**CITY RANKING (OVERALL)**
The Arcadis Sustainable Cities Index charts the average of three sustainability factors to rank 100 of the world’s major cities. Cities can be explored by overall rank or region.

**PEOPLE (SOCIAL)**
Rates health, education, income inequality, work-life balance, ratio of wage earners to dependents, crime, housing, and living costs

**PLANET (ENVIRONMENTAL)**
Energy consumption and renewable energy share, waste management, green space, sanitation, water, greenhouse gas emissions, natural catastrophe risk, and air pollution

**PROFIT (ECONOMIC HEALTH)**
Transport infrastructure, ease of doing business, tourism, GDP per capita, the city’s importance in global economic networks, Internet connectivity, and employment rates

Mahalo for your considerations.

A me ha'aha'a, Bob Leinau
I strongly oppose the inclusion of Economic Policy 10 of O’ahu’s General Plan that reads:

“Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively.”

Non-resort areas include residentially zoned neighborhoods that have increasingly lost housing and rental units to the visitor industry.

Transient Vacation rentals turn local neighborhoods into tourist destinations, changing the character of our home environment and betraying those who purchased homes in residential-zoned areas.

Using the General Plan as a zoning tool will lead to distrust of government and further exacerbate the polarization within our local communities.

Please remove this language from the General Plan and keep our Residential areas Residential.

Mahalo,
Pauline Mac Neil
Kailua, HI, 97634
The proposed language (pasted below) undermines the goals of residential zoning - to keep residential areas for residents. Keep resort activities in resort areas and tax accordingly. Do not make residents compete with businesses for limited residential property, and do not make existing residential property owners pay taxes elevated by inflated prices that these business with high expected cash flows are willing and able to pay. Economic Policy 10 should read “Enforce existing zoning regulations and maintain the residential property stock for residents.”

Economic Policy 10: Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively.
Oahu General Plan Proposed Revisions, Second Draft
Comprehensive Comments and Recommendations
May 8, 2017

TO: Acting Director Kathy Sokugawa
Honolulu Department of Planning and Permitting
Sent via email:

HHF Planners
Sent via email: gp2035@hhf.com

FROM: "Michelle S. Matson, Honolulu
Mo Radke, Kaneohe
Neil Frazer, Kailua
"Cynthia Frith, Kailua
Choon James, North Shore
"Blake McElhaney, North Shore

SUBJECT:
O‘ahu General Plan Proposed Revisions, Second Draft

COMMENTS:

Overall, the department’s and consultant’s conjunctive draft revision of the O‘ahu General Plan requires major revisions and corrections to remove arbitrary additions and return unwarranted eliminations from the existing General Plan.

The foremost faults of the draft revision include the following:

- Neglect and denial of O‘ahu’s Carrying Capacity
- Indifference to Population Increase Impacts
- Invasion of Established Low-Density Areas by Urbanized High-Density Transit-Oriented Development (TOD)
- Invasion of Established Residential Areas by Tourist Vacation Units (TVUs)
- Broken urban growth boundaries enabling infill and increased heights and densities in rural areas.

While the comprehensive additions and revisions to Chapter III, "Natural Environment and Resource Stewardship," are strongly supported with other welcome improvements and additions, the glaring omission of O‘ahu’s Carrying Capacity and conflagration of several established priority land use and transportation objectives and policies diminishes the draft revision to a deplorable outcome.

We urge the Department of Planning and Permitting to revisit and correct these transgressions to produce a more palatable draft in the larger public interest.
Specific Concerns, Comments and Recommendations

Provided below are foremost concerns highlighted in red text with recommended revisions as stricken, and recommended additions as underscored and highlighted in yellow. Bold text and yellow highlighting is implemented to communicate emphasis, and comments are noted as indicated (>).

Glaring Omission and Priority Addition:
Develop and Include Carrying Capacity as the First Chapter in the General Plan

The priority of determining O‘ahu’s Carrying Capacity, with its important objectives and needed policies, is conspicuously absent from the draft revision.

Carrying Capacity of Finite Land Base - Because O‘ahu is an island surrounded by water, it is a finite land base. Global warming and its associated sea-level rise will reduce this land base further within the next several decades. Population increases and visitor inundation must be properly evaluated and mitigated to prevent all-consuming impacts to O‘ahu’s land and natural resources.

Carrying Capacity of Finite Fresh Water Supply - Global warming is causing shifting weather impacts that will increasingly affect O‘ahu’s finite fresh water supply. The island’s fresh water supply is also threatened by leaking fuel tank toxins percolating into the aquifer, and by proposed geothermal industrial pursuits proven to cause seismic instability and injection of toxins into groundwater.

Carrying Capacity of Limited Infrastructure for Sewerage and Solid Waste Disposal - Additionally, there are clear carrying capacity limitations on O‘ahu’s wastewater transport infrastructure and processing capabilities, and near-capacity landfills. Limited and faulty wastewater infrastructure has been one of the greatest challenges for the new high-density urban community of Kaka'ako.

Therefore, Carrying Capacity objectives and policies must be defined before all else, as so aptly and insightfully stated by Hawaii’s former Governor George Ariyoshi in 2004:

“What deeply concerned me as governor continues to concern me these many years later: ...the No. 1 item on the public agenda should be carrying capacity. The question of carrying capacity goes to the heart of everything, and precious few people want to face it ...all the more reason for the public to get involved in such issues as infrastructure, resource distribution, equitable taxation, air and ground transportation, and the impact of ever-growing numbers on recreation, scenic and cultural resources. Hawaii is ours to take care of.”
I. Population

The O’ahu General Plan notes that total land area of O’ahu is approximately 600 square miles with nearly 230 miles of pre-sea-level-rise shoreline. Clearly, this island surrounded by water possesses finite capacity for a continuing population increase added to approximately 893,000 between 1900 (60,000) and 2010 (953,000). While the it might be casually claimed that the population growth rate may be slower in the future, without mitigation measures population growth will nevertheless occur within this finite land base with finite resources.

Together with the foundation of carrying capacity, population size is the determining factor for sustainability of the island and its resources. The Department of Planning and Permitting is therefore urged to ensure development limitations and controls. Clearly, unbridled population growth is the antithesis of sustainability on an island of finite land mass and resources.

Objective A: To plan for mitigate future population growth in a manner that considers conforms with the limits of O’ahu’s natural resources, that protects the environment, and that minimizes social, cultural, and economic disruptions.

Delete Policy 2: Provide adequate support facilities to accommodate future growth in the number of visitors to O’ahu.

➢ Between 2006 and 2016, Hawai‘i’s visitor count increased from 7.7 million to 8.9 million – an increase of 1.2 million. Today, the visitor count on O’ahu is near capacity, overflowing resort areas and negatively impacting many of our local communities. Providing additional “adequate” support facilities (including hotel rooms and vacation units, water and sewer infrastructure, rental cars and tour buses, tourist attractions and other facilities) specifically for visitors to accommodate their future growth will further reduce the quality of life for local residents.

➢ “Adequate” can mean anything, depending on who is doing the interpreting. The imminent carrying capacities of O’ahu’s finite land area, fresh water supply and wastewater disposal are not recognized.

Modify Policy 3: Seek a balanced pace of physical development in harmony with the county’s environmental, social, and cultural, and economic goals by effecting and enforcing City and County regulations, values of the respective communities in which such development is proposed.

➢ Does “by effecting and enforcing City and County regulations” refer to O’ahu’s present and established City and County regulations, or the compromised regulations proposed in this draft revision under Economy Objective A, Policies 5 and 10? Further, City and County regulations often been shown to be subject to administrative interpretation, undermining by variance, and declaratory changes by whatever present decision-makers prevail.
**Objective B** To establish a pattern of population distribution that will allow the people of O'ahu to live, and work and play in harmony.

**Revise Policy 1:** Facilitate the full development of the primary urban center through higher-density redevelopment and the provision of adequate required infrastructure.

- As written, this conflicts with Objective A and is open-ended to allow unfettered, unsafe and unhealthy density. Crowded conditions breed crime, discomfort and discontent.

- “Adequate” can mean anything, depending on who is doing the interpreting. As written, “adequate” lives in the present and is not cognizant of the future, and the imminent carrying capacities of fresh water supply and wastewater disposal are not recognized.

**Modify Policy 3:** Manage land use and development in the urban-fringe and rural areas so that: a. development is contained within urban growth boundaries to prevent urban sprawl; b. population densities in all areas remain consistent with the character and the culture and environmental qualities desired for each community.

- This important policy should not be limited to urban-fringe and rural areas! This important policy should be assured for EVERY area – including Kaka'ako, Kailua, Hawaii Kai, Kahala, Diamond Head, Manoa, McCully-Mo'ili'ili, and Lai'e).

**Revise Policy 4:** Direct growth according to Policies 1, 2, and 3 above by providing development capacity and needed infrastructure to support a distribution of O'ahu’s resident population (with the Primary Urban Center's population at 43% of the island’s total population based on DBED&T’s latest population projections).

- Providing open-ended development capacity for self-serving, profiteering private developers and the required infrastructure to support such open-ended development, which the City and County can’t even support today, for 43% of O'ahu’s unknown population increase within the Primary Urban Center alone, could well lead to the ultimate shut-down of vital services, rationed water supply and overflowing sewers without the foresight needed to determine Carrying Capacity before all else.

- Especially in view of the emerging national administrative policies now shuttling the United States back to the dark ages, several states are beginning to realize the need to stand on their own. As a Sanctuary City, Oahu’s Honolulu could see a vast increase in population over a short period of time, thus escalating the present population to unforeseen numbers within the Primary Urban Center’s 43% population of the island's whole. With such a potential reality can Oahu’s finite island carrying capacity continue to be ignored?
II. The Economy

Objective A

Modify Policy 3: Pursue opportunities to grow and strategically develop non-polluting industries [such as trade, communications, media, medical, life sciences, and technology in appropriate locations] that contribute to O‘ahu’s long-term environmental, economic, and social sustainability.

➢ There is no need to define by examples and thus set limitations, because non-polluting industries extend far beyond such examples to residential solar installations, electric vehicle transport, sustainable commercial fishing, indigenous reforestation and the like.

Revise Policy 5: Foster a healthy business climate by reducing regulatory barriers that are burdensome, redundant, and costly to small businesses, and by encouraging complementary policies that support access to capital and markets and protection of the natural environment.

➢ Whether small business or large industry, this is subjective and open-ended as written, with the potential to cause dangerous vulnerability to established regulatory protections.

Objective B

Delete Policy 10: Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively.

➢ This is a contradictory policy that flies in the face of O‘ahu’s established local communities and residential quality of life.

➢ This contradictory policy opens the floodgates to market-demand visitor intrusion and impacts in non-resort areas.

➢ This policy further contradicts and flies on the face of the well-written Objective B Policies 1 and 3.

• Policy 1: Encourage the visitor industry to improve the quality of the visitor experience, the economic and social well-being of communities, and the quality of life of residents.

• Policy 3: Guide the development and operation of visitor accommodations and attractions in a manner which avoids unsustainable increases in the cost of providing public services and which also respects existing lifestyles, cultural practices, and natural and cultural resources.

➢ This policy conflicts with Housing and Communities Objective A, Policy 11:
• Policy 11: Encourage the construction of affordable homes within established low-density and rural communities by such means as ‘ohana’ units, duplex dwellings, and cluster development that embraces the ohana concept by maintaining multigenerational proximity for local families.

➢ This policy portends visitor take-over of local parks and residential parking, which is presently at a premium in many residential neighborhoods with narrow roads, and overall deterioration of the local quality of life.

Add this as Policy 10: Effectively enforce established restrictions on tourist vacation rentals and bed & breakfast operations in O’ahu’s residential neighborhoods to ensure that rental and housing prices are kept within reach for Oahu’s residents and their families.

Objective C

Revise Policy 4: Remove overly-stringent and costly regulatory impediments that hinder a producer’s ability to the safe development growing conditions and production, marketing, and distribution of locally grown food and agricultural products.

➢ As written, this policy appears to have been induced by large corporate ag interests engaged in the mass production of certain crops enhanced by toxic chemicals percolating into the groundwater, pervading our healthy and fresh island air, and climbing the food chain onto our tables.

Revise Policy 8: Prohibit the development and urbanization of high-value all agricultural land located within and outside the City’s growth boundaries.

Modify Policy 11: Provide plans, incentives, and strategies to ensure the affordability of agricultural land for local farmers.

Delete Policy 14: Protect the right to farm by enforcing right-to-farm laws and by imposing meaningful buffer zones. (see revised Policy 4, above)

Objective D

Revise Policy 3: Encourage the expansion of ocean recreation activities for residents and visitors.

➢ This policy appears to have been induced by ocean recreation entities engaged in exploiting O’ahu’s nearshore ocean resources. Due to the conflicts and controversies spurred by attempted ocean recreation expansion into the Hawaii Kai and Kailua shoreline waters, this policy should be revised to support only the existing and allowable ocean recreation activities as overseen by DLNR.
III. Natural Environment and Resource Stewardship

Objective A: To protect and preserve the natural environment.

Add to Policy 10: Increase public awareness, and appreciation, and protection of O‘ahu's land, air, water resources.

Add to Objective B: To preserve and enhance natural landmarks, scenic views, of O‘ahu for the benefit of both residents and visitors as well as future generations.

Add to Policy 3: Locate and design public facilities, infrastructure and utilities to minimize the obstruction of scenic views and historic sites.

Add to Policy 4: Promote public access to the natural environment for recreational, educational and cultural purposes and the maintenance thereof in a way that does not damage natural, historic or cultural resources.

Insert Chapter Specific to Historic Preservation and Resource Stewardship

➢ Include Chapter X Objective B applicable Policies here

IV. Housing and Communities

Objective A

Revise Policy 12: Promote higher-density, mixed use development, including transit oriented development, to Increase the supply of affordable and market homes convenient to jobs, shops and public transit.

➢ As written, this policy suggests that “higher-density, mixed use development, including transit oriented development” can be anywhere on the island.

Add to Policy 13: Encourage the production and maintenance of affordable rental housing, ohana housing, and accessory dwelling units specifically for O‘ahu residents.

Modify Objective B: To minimize reduce prevent speculation in land and housing.

Restore and Add to Policy 2: Discourage speculation in lands within and outside of areas planned for urban use, and prevent private developers from acquiring and assembling land outside of areas planned for urban use.

Revise Policy 3: Seek Require public benefits from increases in the value of land owing to City and State developmental policies and decisions.

➢ Private developers have not been required to compensate the communities that their developments have impacted with higher densities and populations, particularly compensation for the impacts on schools, parks and
infrastructure. Developers must be held accountable for these impacts by building additional schools, reserving and landscaping public park open space, and providing the additional infrastructure needed for their developments. These impacts diminish the quality of life in the affected areas that cannot be compensated by “cash in lieu” or more modest development elsewhere. This avoidance has been especially woeful in Kaka’ako and Waikiki, the present centers of unfettered development.

Add New Policy Here by Restoring and Adding to Existing Transportation and Utilities

Objective D, Policy 2: Use transportation and utility systems as a means of guiding moderate growth and the established pattern of land use on O‘ahu.

Objective C

Revise Policy 4: Encourage residential development in suburban areas where existing roads, utilities, and other community facilities are not being used to capacity, and in urban areas where higher densities increased residential use can be readily compatibly accommodated.

➢ Suburban areas are not high-density urban areas.

Modify Policy 6: Discourage Prevent residential development in areas where the topography makes construction difficult or hazardous and where providing and maintaining roads, utilities, and other facilities would be extremely costly or environmentally damaging.

Add to Policy 7: Encourage public and private investments in older communities as needed to retain their existing attributes, character, and quality of life, and their local vibrancy and livability.

V. Transportation and Utilities

Objective A

Revise Policy 5: Support the rail transit system as the transportation spine for the urban core, from Kapolei to Middle Street, with linkage to the airport and cruise ship terminals, which will work together with a bus feeder network transit oriented development to reduce automobile dependency and increase multimodal travel.

➢ This Policy is specific to transportation alternatives, and accessory development is addressed under Chapter VI, Objective A, Policy 6.

Add to Policy 9: Consider and address environmental, social, cultural, and climate change and natural hazard impacts, as well as construction and operating costs, as important factors in planning transportation system improvements.
Add to Objective B: To provide the needs of the people of O‘ahu for an adequate by providing a safe fresh water supply determined by its calculated carrying capacity of water and for environmentally sound systems of waste disposal for O‘ahu’s existing population and for future generations.

Add to Policy 1: Develop and maintain an adequate, safe, and reliable, and cost effective supply of fresh water in a cost-effective way that supports the long-term sustainability of the resource and considers the impacts of climate change, including possible decreases in water supply due to drought.

Add to Policy 2: Develop and maintain an adequate, safe and reliable non-potable supply of water for agricultural and industrial needs in a cost-effective way that supports the long-term health sustainability of the resource and considers the impacts of climate change, including possible decreases in water supply due to drought.

Objective D

Revise Policy 3: Require the underground installation of underground utility lines wherever feasible and burial of overhead utility lines.

➢ For far too long HECO has been obstructively stalling and avoiding burial of overhead utility lines, which are the most obtrusive blight over the greatest area of O‘ahu.

Revise Policy 4: Seek improved taxing powers for the City and County funding efficiency through general obligation bonds and public-private partnerships in order to provide a more equitable means of financing transportation and utility services.

➢ Via the latest rail funding fiasco, both the City and County and the State Legislature have proven that taxing powers are the worst and most inequitable means of financing.

Add to Policy 5: Evaluate and develop a plan to avoid impacts of sea level rise on existing public infrastructure, especially sewage treatment plants, roads, and other public and private utilities presently located along or near O‘ahu’s coastal areas.

VI. Energy

Objective A

Restore Policy 5: Give adequate full consideration to environmental, public health, and safety concerns, to resource limitations, and to relative costs when making decisions concerning alternatives for conserving energy and developing natural renewable energy resources.

Modify Policy 7: Promote and assist efforts to optimize the use of all environmentally safe proven sources of renewable energy.
Reduce New Policy 6: Support and participate in research, development, demonstration, and commercialization programs aimed at creating new, cost-effective, and **environmentally sound** renewable energy supplies, including but not limited to: a. solar energy; b. biomass energy conversion; c. **wind energy conversion**; d. **geothermal energy**; e. ocean wave energy; and f. ocean thermal energy conversion.

- Geothermal energy production and wind energy conversion have been proven to be notoriously unsafe. Wind energy has had escalating bird-killing rates that environmentally impacts O‘ahu’s wildlife. Geothermal energy production has been proven to cause seismic instability and toxic infiltration of groundwater. Further, Hawaii Island has experienced unsafe conditions from geothermal mining that has proven to be a health hazard.

https://www.scientificamerican.com/article/geothermal-drilling-earthquakes/

VII. Physical Development and Urban Design

Objective A

Add to Policy 2: Coordinate the location and timing of any new development with O‘ahu’s present and future carrying capacity as determined by UH studies for the island’s **finite land base** and with the availability and sustainability of adequate O‘ahu’s **fresh water supply**, sewage treatment and drainage infrastructure, together with transportation and other public safety facilities and services.

Add to Policy 4: **Facilitate and encourage compact, higher-density development in urban areas** Primary Urban core areas designated for such uses while ensuring controls on such development to prevent overcrowding that leads to unsafe and unhealthy conditions breeding crime, discomfort and discontent.

- As written, this Policy is open-ended and invites compact, higher-density development elsewhere than in the Primary Urban core area, specifically for which this is designated.
Revise Policy 6: Facilitate transient-oriented development in rail transit station areas to create live/work/play multi-modal communities that reduce travel and traffic congestion.

➢ As written, this Policy invites urbanized high-density invasion of established lower-density areas by high-density transit-oriented development around any bus transit stop anywhere on the island.

Revise Policy 7: Locate any new industries and new commercial areas so that they will be compatible with their surrounding area and well related to their markets and suppliers, and to residential areas and transportation facilities.

➢ Industries and commercial areas are not compatible with established residential areas and thus were never zoned for same. Further, this policy clearly conflicts with Policy 9:
• Policy 9: Exclude from residential areas, uses which are major sources of noise and air pollution.

Add to Policy 10: Encourage increased shoreline set-backs and siting and design solutions that seek to reduce exposure to natural hazards, including those related to climate change and sea level rise.

Add to Policy 12: Promote community-based planning with opportunities for the all communities to participate meaningfully in and substantively contribute to the planning and development processes, including new forms of communication and social media, and ensure that City and County decision-making complies with community needs and desires as well as regulatory controls.

Revise Objective C: To develop the urban corridor stretching from Honolulu (Wa‘i‘ale- Kāhala to Hālawa), ‘Aiea, and Ala Moana to Pearl City as the island’s primary urban center.

➢ Waiala‘e Kahala, Diamond Head, Kapahulu, Kaimuki, Manoa, and McCully-Mo‘ili‘ili are established residential communities. Waikiki is Oahu’s established primary shoreline resort area. The Primary Urban corridor extends from Ala Moana to Pearl City.

Modify Policy 1: Stimulate development in along the primary urban center corridor by means of the City and County's capital improvement program and State and Federal grant and loan programs.

Restore and Add to Existing Policy 2: Provide for the expanded development of low-rise multi-unit housing in established areas within the Primary Urban corridor that will ensure an attractive living environment and compatibility with surrounding land uses.
**Restore and Add to Existing Policy 3:** Encourage the establishment of mixed-use districts with appropriate design and development controls within the Primary Urban corridor to that will ensure an attractive living environment and compatibility with surrounding land uses.

**Reconsider Policy 6:** Facilitate the redevelopment of Kaka’ako as a major mixed-use residential, office, and commercial area that provides housing, jobs, recreational facilities, pedestrian safety, and other amenities and services that are needed by the area’s residents and workers.

- Kaka’ako is not under the planning and zoning jurisdiction of the City and County. This jurisdiction is held by the State’s Hawaii Community Development Authority.

Objective E

**Modify Policy 4:** Maintain vibrant rural areas that reflect a relatively open and scenic setting, dominated by small to moderate size agricultural pursuits, with small towns of low density and low rise character, and which allows modest growth opportunities to address area residents’ future needs.

- “Relatively” is open-ended and subjective.

**Revise Policy 5:** Encourage the development of a variety of housing choices including affordable housing in rural communities to replace lost housing inventory, and to give people the choice to continue to live in the community that they were raised in.

- Does replacing “lost housing inventory” mean that TVU’s and B&Bs are intended to take over Oahu’s rural communities? This is an inappropriate consideration unworthy of suggestion.

**Revise and Relocate Policy 6:** Ensure the social and economic vitality of rural communities by maintaining the established character supporting infill development and modest increases in heights and densities around of their existing rural town and residential areas where feasible; and modest adjustments to growth boundaries to maintain an adequate supply of housing for future generations.

- This proposed policy as written opens the floodgates to compromised urban boundaries, higher density development and commercialization of established rural communities. This is unacceptable as it redefines “rural” by morphing it to “urban,” thus creating an oxymoron.
- “Adequate” is open-ended and subjectively invites urban sprawl and sub-urban housing tracts into rural communities.
- As properly rewritten, this Policy belongs under Chapter IV, Housing and Communities.
Objective F

**Add to and Clarify Policy 2:** Require the consideration of compatible urban design principles in all development projects **within the Primary Urban corridor, including, but not limited to, the national planning standard of 2 to 2-1/2 acres of urban recreational park open space per 1,000 capita.**

**Modify Policy 5:** Seek to **Protect** residents’ quality of life and to maintain the integrity of neighborhoods by strengthening regulatory and enforcement strategies that address the presence of inappropriate non-residential activities.

**Restore Policy 7:** Promote public and private programs to beautify the urban and rural environments.

**Restore and Add to Policy 8:** **Dedicate, protect,** preserve and maintain **ample public park** open space in urbanized areas.

**Revise Policy 6:** Support and encourage cohesive neighborhoods which foster interactions among neighbors, promote vibrant community life, and enhance livability that **enhance a community’s social capital** reflects the community’s values.

VIII. Public Safety and Community Resilience

**Objective B**

**Add to Policy 3:** Participate with State and Federal agencies in the funding and construction of flood-control projects, and prioritize the use of ecologically- and environmentally-sensitive flood control strategies when feasible.

**Add to Policy 9:** Plan for the impacts of climate change and sea-level rise on public safety, in order to minimize potential future hazards.

IX. Public Health and Education

**Objective A**

**Add to Policy 5:** Encourage healthy lifestyles by supporting opportunities that increase access to and promote consumption of **safe,** fresh, locally grown foods.

**Add to Policy 6:** Encourage healthy lifestyles **that protect pedestrians and bicyclists** through walkable communities, safe street crossings, safe routes to schools, and **safe public parks** and open spaces for pedestrians and bicyclists.
Objective C

**Add to Policy 3:** Encourage **safe, non-hazardous** research institutions to establish branches on O’ahu.

➢ **We do not want to encourage any bio-hazard labs in or near our urban and visitor centers on O’ahu.**

X. **Culture, Historic Preservation (relocate to separate Chapter)** and Recreation

Objective A

**Modify Policy 1:** Encourage the recognition of **Recognize** the Native Hawaiian host culture, including its customs, language, history, and close connection to the natural environment, as a dynamic, living culture and as an integral part of O’ahu’s way of life.

**Revise Policy 3:** Encourage greater public awareness, understanding, and appreciation of cultural heritage and contributions to Hawai’i made by the City of O’ahu’s various ethnic groups.

Objective B

**Add to Policy 7:** Encourage the protection of areas that are historically important to Native Hawaiian cultural practices and to the cultural practices of other ethnicities, in order to further preserve and continue these practices **for future generations**.

**Modify Objective D:** To provide a wide range of recreational facilities and services that are readily available to all residents and visitors alike, and that **balances** access to natural areas with the protection of those areas.

**Modify Policy 10:** Utilize our unique natural environment in a responsible way to **promote include** cultural events and activities.

➢ “Promote” conveys commercialization.

**Add Priority Policy:** **Ensure conformance with the national planning standard of 2 to 2-1/2 acres of urban recreational park open space per 1,000 capita within the Primary Urban center.**

**Modify Policy 13:** Create and **support** recreational venues for keiki and kupuna and for kamaʻāina and malahini.

➢ “Promote” conveys commercialization.
Objective D

**Revise Policy 2:** Develop, and maintain, and expand a system of regional parks and specialized recreation facilities—based on sustainable practices and in the greater public interest the cumulative demand of residents and visitors.

- “Specialized” recreational facilities based on “cumulative demand” indicates monopolization of public recreation facilities in favor of one interest and at the exclusion of others.

**ADDENDUM ADDRESSING QUESTIONS OF SHIFTING DIRECTIONS**

The draft revision’s Introduction shifts the established intent of the O‘ahu General Plan from providing “for the future growth of the metropolitan area of Honolulu” to providing direction “to accommodate the future growth projected for O‘ahu”

There is a vast difference in these directions. The original language established the intent of the O‘ahu General Plan and should be restored.

The Preamble under #19 refers to reasonably priced homes in safe and attractive neighborhoods as a primary concern of the General Plan. If this is so, why is the revised draft promoting tourist vacation units in established neighborhoods “as warranted by market demand,” which reduces available housing and precludes local residents from renting and purchasing housing at attainable prices?

This section also refers to “whole communities” integrated into surrounding land uses and the natural environment. Please define “whole communities.” Again, it appears that the drafters of the draft revisions are pursuing urbanization of lower-density and rural areas, which flies in the face of the established General Plan.

In addition, #20 describes the direction for the metropolitan area of Honolulu, but can be interpreted as being for the entire island. Again, this is not the intent of the established General Plan, and requires definition of the area for “higher-density housing via mixed use and transit-oriented developments” as being in the metropolitan area of Honolulu.

Please clarify the meaning and intent of growth of rural “centers” in an “organic fashion,” under #24.

Please explain what is meant by “changing demand” for needed park space, under #28.

Promoting recreational venues and cultural events and activities utilizing O‘ahu’s “natural environment” conveys commercialization of our island’s natural resources and open spaces. Please explain what is envisioned by this description under #29.

Finally, it is hoped that clarification and interpretation of the above will not require involvement of the present City Council, per #50.
Any "plan" for Oahu that does not address issues of carrying capacity, unbridled population growth, deficient and inadequate infrastructure and changing sea levels, is not a plan at all------It’s a recipe for disaster.

Population size is the foundational issue from which all other issues grow. Therefore, it rightly appears first and foremost in the current General Plan:

“To control the growth of Oahu’s resident and visitor populations……”

“Publicize the desire of the City and County to limit population growth…..”

“Reduce inmigration…..”

“Control population growth…..”

For an island with finite resources, these policies make perfect sense.

In light of these facts, it is very disturbing that the General Plan Second Public Review Draft does the following:

“Eliminates references to limiting population growth…..”

Makes no mention of over-population or carrying capacity…..

Sounds as if we are going to allow unfettered growth......

Please encourage the Department of Planning and Permitting to retain the population policies that appear in the current General Plan and strongly encourage the “powers that be” (P.R.P., L.U.R.F. et al) to comply with those policies.

Larry McElheny
Haleiwa, 96712

Please see attached:
“We can’t build our way out of congestion.”

Unsustainable Transportation and Land Use Cycle

- Residents call for road widening
- Congestion develops
- More residents and shoppers are traveling farther
- Subdivisions and businesses develop and people move out to larger, cheaper homes
- Under political and development pressure, land is rezoned
- No congestion on roadway
- Land farther out becomes accessible
- Land prices rise; landowners request rezoning of residential and commercial property
Oppose economic part 10 of General Plan 7

Cheryl McIlroy
Kailua, HI 96734
To Whom it May Concern,

Regarding Objective B, Policy 10: "Policy 10: Effectively enforce the current ban on vacation rentals and bed & breakfasts in residential neighborhoods to ensure that we continue to have residents in our neighborhoods. Every vacation rental is a displaced family. The homeless population is exploding on our island and this is directly related to the explosion of vacation rentals. Please do not be on the wrong side of history on this issue. Vacation rentals are destroying our communities."

Thank you,
Kandis McNulty
McNulty Civil Engineering
Waialua, HI 96794
"Policy 10: Effectively enforce the current ban on vacation rentals and bed & breakfasts in residential neighborhoods so families in our communities can find affordable houses to rent and purchase. Tourists in residential neighborhoods are destroying the social fabric of our towns & cities.

Please feel free to call me with any questions.

Sincerely,
Michael McNulty P.E.
McNulty Civil Engineering
Waialua, HI 96794
The most important word here is "illegal". It's time to close them down, not worry about all the tax money the
government might get if these owners were paying on their income which, of course, they are not. Let's stop
dancing around this issue and shut these illegal business down now.

Judy Mick, Kailua
Thank you for a reasonable approach.

"Economic Policy 10: Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively."

Kevin Mulkern
Aloha,

The Oahu General Plan offers various ideas for population growth throughout our vast Neighborhoods. I’m amazed that the **PUC will grow by 46%** by 2025 in just 8 years from now. Even the Rural areas on the north Shore areas will have growth in population. I am not against SMART GROWTH, which includes up-grading all forms of the Infrastructure- whether it be water source, agricultural resources, sewer system upgrade, roadway system to handle the additional commuters, electricity and others. The pace the City is having Urban Population explosion without up-grading any of the necessary Infrastructures is very alarming in the Kakaako neighborhood. I know that the Hilton’s Time Share complex had sewer up-grade, but not further up where the Ritz Carlton complexes are located.

What is the true nature of the City’s idea for the future? If it’s to bring in more residents to help pay for various City Services via Property Taxes, Registration Fees, etc., don’t forget these residents also need the **basic & essential Infrastructures to be in placed first for Growth**! The current roadways, full of Pot Holes, broken water pipes, poor drainage, etc. will not be able to sustain the future growth.

I thank you for the opportunity to comment on this important matter that will affect all of us on Oahu for the near future.

Daisy Murai
Dear Sir/Madam,

This is in support of the proposed language changes of the SECOND PUBLIC REVIEW DRAFT O‘AHU GENERAL PLAN Your Island. Your Future.

"Economic Policy 10: Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively."

Since the issuance of NCU’s in the 1980’s making it legal to operate B&B rentals, 800+ still being allowed to operate and the subsequent denial to suspend the practice, the problem of transient rentals has become a serious problem. The suspension due to negative feedback and inadequate regulation, for the past 29 years, by the City Council has created an extremely hostile and rancorous environment on Oahu and by no action has made our neighborhoods literally unsafe for the residents. Many owners trying to stay and maintain their homes have taken to operating B&B’s to make ends meet and although they are legal with the state by paying all of the appropriate taxes, from which the county benefits, are doing so unpermitted. This new language in the General Plan is a welcome step toward some kind of resolution. We all recognize the investor both local and offshore abuse of uncontrolled and unsupervised home rental through the internet on many of our beach front communities and neighborhoods is appalling and undesirable. But grouping local families from trying to stay in their homes by providing owner/operator controlled services and greed driven operations is like throwing the baby out with the bath water. We do not oppose a thoughtful regulatory process to allow us to operate, which has never been implemented, and welcome the opportunity to participate in the process and still let our communities to grow responsibly. Recent bills to encouraging neighbor lawsuits brings back a black period in US history of McCarthyism as well as possible violations of our constitutional rights is a knee jerk reaction by the Honolulu City Council based on ignorance.

We, again, wholly support the language changes look forward to an new era of change.

Norm Nichols
Aloha -

Attached are my comments for the Oahu General Plan.

Mahalo,

Kathleen Pahinui
Waialua Resident
General Plan Comments

Preamble
Page 11, Section 24 Physical Development and Urban Design
- New language that discusses rural areas growing organically – what does that mean?

Page 13, Section 29 Culture and Recreation
- New focus on the visitor. Moving forward in this document, lots of references to residents and visitors. It feels that the focus on residents is either being subsumed or being made co-equal with visitors.
- Changes should be focused on the residents not visitors. If positive improvements are made for those of us who live on Oahu, visitors will benefit.

1. Population
Page 22, Section 52, New Objective A
To plan for future population growth in a manner that considers the limits of Oahu’s natural resources, that protects the environment, and that minimizes social, cultural, and economic disruptions.
- Not sure what this means. Sounds as if we are going to allow unfettered growth. Nothing in the policies talk about overpopulation and the island’s carrying capacity.
- Need clear definitions related to the distinction between controlling population growth, and/or continued focus on managing population growth.

Page 23 Section 69, Policy 4 Distribution of Residential Population
- What is the 2040 population that these increases are based on?
- Currently the population of the North Shore is about 15,000. Total Oahu population as of July 1, 2016 is 992,605. This means North Shore has about 1.5% of total Oahu population. We are already busting at the seams when you add 5,461,880 visitors coming to Oahu (61% of 8,941,394 total visitors in 2016) and in a 2007 survey it was shown at least 50% come to the North Shore or 2,730,940 annually or 227,578 monthly. This is stressing our aging infrastructure greatly.
- The current state goal is more visitors. This is not sustainable giving the limited space on our island. If for example, O'ahu’s population grows to 1.2 million by 2040 with 2% to the North Shore, we are talking another 207,395 residents on Oahu with 4,148 going to the North Shore. That is almost 20,000 North Shore residents. We are busting at the seams as it is with the addition of visitors to the mix. This increase IS NOT sustainable or healthy for our community.
- Do not expand the purpose of the document from primarily serving the needs of Oahu residents - to addressing the needs of Oahu visitors.
- The Plan should retain and restore the existing references to limiting Oahu’s population growth in the currently adopted General Plan;
2. The Economy
Page 26, Section 80, Objective B
To maintain a successful visitor industry that creates meaningful employment, enhances quality of life, and celebrates our unique sense of place, natural beauty, Native Hawaiian culture, and multi-cultural heritage.

- An increase in North Shore population especially without sufficient infrastructure investment will not do any of the above and only strain what we have and decrease the quality of life for our community.

Page 26, Section 83, New Policy 3
Guide the development and operation of visitor accommodations and attractions in a manner which avoids unsustainable increases in the cost of providing public services and which also respects existing lifestyles, cultural practices, and natural and cultural resources.

- This appears to be a veiled policy to support growth within the vacation rental industry. Have the visitors stay in houses already built so no more hotels need to be built. However, given the number of visitors to Oahu – 5 million plus annually, and the amount of illegal TVUs already on the books, most of Oahu will not be for the residents but for the visitors.

Page 26, Section 84, New Policy 4
Provide for the long-term viability of Waikīkī as a world-class visitor destination and as Oʻahu's primary resort area by giving Waikīkī priority in visitor industry related public expenditures and by encouraging private investment in enhancing facilities and attractions that support the visitor industry.

- So more visitors to Oahu, more to the North Shore, more residents on the North Shore but no money for the North Shore. Spend it all in Waikīkī. This is social injustice not just for North Shore but for the rest of Oahu. We need to have our property taxes spent in our community.

Page 27, Section 90, New Policy 7
Facilitate the development of the following secondary resort areas: Ko ʻOlina Resort, Turtle Bay Resort, Hoakalei Resort at Ocean Pointe, Mākaha Valley, and Lāʻie.

- The Plan should not newly designate Laie as an official “Resort” area for Oahu;

Page 27, Section 91, Old Policy 7
Manage the development of secondary resort areas in a manner which respects existing lifestyles and the natural environment, and avoids substantial increases in the cost of providing public services in the area.

- You can’t have a resort without infrastructure. Is this another veiled reference to significantly expanding TVUs?
• The Plan should not create new allowances for alternative accommodations, such as vacation rentals, in non-resort areas throughout Oahu.

Page 27, Section 95 New Policy 10
Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively.

• You have just stated to focus on Waikiki so you don’t have to worry about increased infrastructure. This will allow proliferation of visitor accommodations outside of Waikiki and the other already designated resort areas on Oahu.

Page 27, Section 96, Objective C
To ensure the long-term viability and continued productivity of agriculture on O‘ahu.

Page 28, Section 101, New Policy 4
Remove overly-stringent and costly regulatory impediments that hinder a producer’s ability to develop, market, and distribute locally grown food and products.
This is vague. What does it mean? Are there examples?

Page 29, Section 118, New Policy 16
Incorporate into planning documents the scenic value of agricultural lands as an open-space resource and as a valuable tourist amenity, and plan ways to make associated rural communities be part of this desirable scenic resource.

• Are we talking about food sustainability and growing food or again providing more activities to tourists?

III. Natural Environment and Resource Stewardship
Page 34, Section 152, Objective B
To preserve and enhance natural landmarks the natural monuments and scenic views

Page 34, Section 155, Policy 3
Locate and design public facilities, infrastructure and utilities to minimize the obstruction of scenic views.

• Open up view plans where vegetation obstructs views and provide for pull offs to take pictures read informative signs etc.

VI. Energy
Page 45, Section 240, Objective A
To increase energy self-sufficiency and maintain an efficient, reliable, resilient, and cost-efficient energy system.

Page 45, Section 247, New Policy 4
Promote and assist efforts to optimize the use of all proven sources of renewable energy.

• No windmills on or off shore.
VII. Physical Development and Urban Design

Page 49, Section 276, Objective A
To coordinate changes in the physical environment of O’ahu to ensure that all new developments are timely, well-designed, and appropriate for the areas in which they will be located.
  • Add other impacts as inadequate street parking

Page 49, Section 277, New Policy 1
Provide infrastructure improvements to serve new growth areas, redevelopment areas, and areas with badly deteriorating infrastructure.
  • Add inadequate to this policy

Page 50, Section 284, Policy 6
Facilitate transient-oriented development in transit station areas to create live/work/play multi-modal communities that reduce travel and traffic congestion. The Plan should not create newly expanded areas for the Rail Project’s so-called transit oriented development (“TOD”) beyond the Rail Route in order to allow high-density development and developer give-aways throughout Oahu.

Page 53, Section 314, Objective E
To maintain those development characteristics in the urban-fringe and rural areas which make them desirable places to live.
  • The Plan should not provide new allowances for development outside of the existing urban core. The Plan should retain the current protections for rural communities in the currently adopted General Plan.

Page 53, Section 318 Revised Policy 4
Maintain vibrant rural areas that reflect a relatively open and scenic setting, dominated by small to moderate size agricultural pursuits, with small towns of low density and low rise character, and which allows modest growth opportunities to address area residents’ future needs.
  • What does “relatively” mean in this context?
  • How does this policy work with the above policies regarding visitor accommodations? Those policies seem to be in conflict with this policy.

Page 54, Section 320, New Policy 6
Ensure the social and economic vitality of rural communities by supporting infill development and modest increases in heights and densities around existing rural town areas where feasible; and modest adjustments to growth boundaries to maintain an adequate supply of housing for future generations.
  • How does this work with the North Shore Sustainable Communities Plan?
  • Who decides on the modest adjustments to the growth boundaries?
  • Who decides what constitutes a modest increase in height and density?
Page 54, Section 321, New Objective F
To create and maintain attractive, meaningful, and stimulating environments throughout O‘ahu.

Page 54, Section 322, Deleting Old Policy 1
Prepare and maintain a comprehensive urban design plan for the Island of O‘ahu.
Deletes policies calling for a comprehensive urban design plan. “We need good comprehensive planning now more than ever.

X. Culture and Recreation
Page 66, Section 411
Objective D
To provide a wide range of recreational facilities and services that are readily available to all residents and visitors alike and that balances access to natural areas with the protection of those areas.

Page 67, Section 413, Revised Policy 2
Develop maintain, and expand a system of regional parks and specialized recreation facilities, based on the cumulative demand of residents and visitors.
- Does this mean money will be spent on the North Shore to ensure our parks in maintained? Previous statements indicate more money will be spent in Waikiki.

Page 67, Section 421, Revised Policy 8
Encourage ocean and water-oriented recreation activities that do not adversely impact on the natural environment and cultural assets, or result in overcrowding or overuse of beaches, shoreline areas and the ocean.
- Our beaches are already overcrowded. This goes back to the population numbers.
- Kaena Pt used to be a quiet area, now on any given weekend, it is very busy and no longer offers a quiet respite for the community.

General Comments
- Combining “recreation” with “cultural” as a single category was inappropriate. They are both important and often not related. The Plan should Hawaiian words in the document or both English and Hawaiian words [e.g. Diamond Head/Leahi]
- Plan talks about planning an orderly sequence for future development. What does that mean? Recommend infrastructure come first.
- Allocate funds from the City and County's capital improvement program for public projects that are needed to facilitate development of the secondary urban center at Kapolei Add in a fair and equitable way. Along with the funding to Waikiki, it would appear there will be nothing left for the rest of the communities on Oahu.
I am writing to voice my STRONG OPPOSITION to the following change in the proposed General Plan:

"Economic Policy 10: Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively."

I DO NOT support inserting this type of language in the General Plan. There is a significant shortage of housing on Oahu, and allowing further development of residential neighborhoods into vacation rentals is counterproductive to the survival of communities and affordable housing.

I recommend deleting the current language and replacing it with

Policy 10: Effectively enforce the current ban on vacation rentals and bed & breakfasts in residential neighborhoods to bring down rental and housing prices for O'ahu's residents.

Mahalo for your time and attention to this important matter.

Teresa Parsons
Kailua resident and property owner
I reviewed the Oahu Grand Plan and have serious concerns about the current version of Policy 10 under II. Economy.

“Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively.”

How is this policy even on the table when it has been shown that the Department of Planning and Permitting (DPP) either refuses to or is ill equipped to "enforce effectively" the existing ban on the 8,000+ illegal vacation rentals? The next step is to enforce existing laws, which means shutting down the thousands of illegal hotel operations in all of O'ahu's residential neighborhoods! Given that, I propose the following language changes in Policy 10:

"Effectively enforce the current ban on short-term vacation rentals in residential neighborhoods to bring down rental and housing prices for O'ahu's residents."

Thank you,

Michelle

Michelle Pillen
Kailua, HI 96734
To Whom it May Concern and City Councilmembers

Re: Comments to the Honolulu General Plan, Economy, Policy #10,

Please do not adopt Policy 10 in the Economy section as stated in the draft being circulated for comments. It only encourages an already out of control, detrimental situation regarding transient vacations units. I suggest it read as follows.

Policy #10. Permitting small-scale community-oriented visitor accommodations in non-resort established residential areas should be very limited as this short-term transient use is non-conforming, i.e. inconsistent with residential zoning and is divisive and known to have significant social, economic (costs) impacts on the resident population of Honolulu. Until proven effective enforcement measures are adopted and the vast number of illegal transient vacation units are stopped and returned to the inventory of long term residential use, no new permitting should be allowed. Preservation and protection of Oahu’s very limited residential inventory and the highly valued residential quality of life should be of the highest priority. After enforcement has been proven effective and illegal's have been brought under control, permitting caps should be established in each neighborhood and neighboring property owners (within 75 feet who will be impacted most) should be given a approval/disapproval role in the permitting and permit renewal process.

Additional thoughts:
Perhaps the caps should be for each Neighborhood Board sub-district, both B&B and TVR combined held at a figure less than .003 of residential properties and permitting should require the consent of all property owners within 75 feet of the property seeking the non-conforming use permit. Such a permit should be subject to periodic renewal and at each renewal, property owners within 75 feet should have the opportunity to withdraw consent resulting in denial of a renewed permit. This would significantly increase the incentive for operators to be good neighbors!
Our experience with TRV’s:
We have lived in our home in Kahala for 42 years, raising a family here. We live next to one legal and one illegal vacation rental. For 15 years we had wonderful local families in both of these homes. Now one is owned by a Japanese Corporation and the other a California attorney. Both operate additional TVU properties elsewhere in Kahala and Diamond Head. Both detract from the quality of life for those of us living on neighboring properties. Both either sit empty or have large groups. Often these groups are celebrating something and in a vacation/party mode. It’s not unusual for the renters to have a large party meaning lots of trucks as they frequently have tables, chairs, tents, caterers, musicians, etc. coming and going to service the event and lots of party goers generally departing late at night... not quietly. Though the illegal operation has been cited by the City more than once, they continue to rent... not as often, but have become increasingly clever at it. I am sure city inspectors can educate you on various ways the illegal operators use to make it difficult to stop them. With the huge income they derive, they have little reason to be deterred unless there is a significant consequence, which I don’t believe there is. Now you want to make it even easier for them.

Why would you do this? It seems our laws are not being enforced and the City has questionable intentions of curbing the proliferation of illegal TVUs or, by effective enforcement, returning the thousands of illegal residential properties to the inventory available to local residents. I am certain you have been made aware of the numerous detrimental social and economic ramifications these operations have directly and indirectly (baked in) for local residents yet this threat continues to exist and hang over us.

The Waialae-Kahala Neighborhood Board has repeatedly over the past decade taken a stand in passing resolutions opposing the proliferation of TVUs in residentially zoned neighborhoods and pleaded for better enforcement.

Please stand up for us. Save our neighborhoods. DO NOT add policy to the General Plan that will only encourage more and make an already out of control situation worse.

Lucinda and John Pyles
Kahala
From: Miriam Rappolt
Sent: Sunday, May 07, 2017 1:53 PM
To: General Plan 2035
Subject: Policy 10

We have lived in Kailua for 36 years and bought into a neighborhood zoned residential (not commercial). Within the past few years two neighbors across the street on Kainui Drive have added substantial additions. The more recent added 4,000 square feet to the existing 3 bedroom house and claims that it is a "rec room" with a bar-- both are conducting short term rental operations. We've seen many, many cars and people -- the larger house at 1375 Kainui often has as many as 5 cars parked on the street-- having only 3 spots available as driveway parking. And the owner does not live there-- only "visits" occasionally. It's obvious that this is an illegal business operation.

What about the problems of additional strains on our sewer facilities-- and the number of trash barrels out for pickup-- triple the number of most single family homes? But my main concern is the commercialization of the neighborhood and the inability to "police" such scofflaws. I don't see anything in place to actually implement regulation, since obviously the planning department lets anything go up on residential property.

Miriam and Ken Rappolt
Kailua
To Whom It May Concern:

I write in opposition to the language and terms of Economic Policy 10 permitting vacation rentals in non-resort areas. It is important to quality of life that residential neighborhoods be kept residential, that there are areas where residents can have a daily life not determined by the desires and needs of those vacationing, which are quite different from the needs of residents. I say this as someone who has lived in Waikiki off and on for the 30 years I’ve lived here, meaning that I appreciate visitors and I also know how different it is in Waikiki to live next door to vacationers versus residents who work and have a long-term life here. It is wearing and it also leads to tensions, as vacationers save to come here or at the least come here willing to spend their money, and they do deserve to have fun unfettered by the needs of a neighbor who needs sleep and quiet.

Thank you for your attention to this comment.

Alethea Rebman
Dear HHF Planners,

Transient vacation units ("community hotels and alternative lodging") do not make desirable neighbors nor do they contribute to the quality and character of life sought and valued in residential communities. They deny conforming property owners (adjacent to or within sight and sound of such a property) the right to preserve and protect their quality of life, the residential character of their neighborhood, and the value of their property.

Parcels in my non-gated, single-family neighborhood have recorded covenants and restrictions (CC&Rs) by purposeful design. The proposed change will cause conflict between owners who wish to preserve their CC&Rs and those who will mistakenly believe your change means it’s OK to violate them. Our CC&Rs run with the land, are enforceable and, therefore, it is not OK to change the use just because you change the General Plan after the fact. I bought my home with the expectation the character of the area will remain residential. Please, planners, do not put owners like me in a position of having to enforce my rights against a neighbor whom you will have misled!

Visitor accommodations, whether B & Bs, vacation rentals, corporate retreats, community hotels or any other "alternative" lodging or dwelling units are not compatible with residential neighborhoods. Each is an inappropriate use in these zones. Families do not want strangers next door or across the street every couple of days; we do not want properties in our midst which have been turned into businesses and are frequently vacant; we do not want vacationers partying next door on nights when we've got work and school the next morning. We do not want increased congestion cause by more cars parked on the street. We certainly don’t want our property values to go down because of it!

A community is relatively stable, it includes a permanent life in a definite place where companionable social relations between people can be established and a genial feeling can evolve. Knowing and interacting with neighbors, children attending local schools, residents having a familiarity with the daily schedule of living are what make a neighborhood. We want the stability this provides. Transient guests do not support what creates a community.

As a tax paying citizen with owner’s rights, I support keeping our neighborhoods residential & protected from mixed uses including from businesses operating as alternative visitor accommodations. I am opposed to the proposed change as written for established neighborhoods in the soon-to-be-revised Oahu General Plan. At the least, for areas like mine with recorded covenants & restrictions running with the land, our rights ought to be respected and explicitly protected in any revised Plan.

Respectfully,
Nina Reppun Carney
Honolulu 96816
DPP and Consultants,

I live in Kailua where the rents are outrageous. Allowing the limited space we have available for our local people to be rented out as visitor accommodations is a terrible idea. This is now an island-wide problem as the housing pressure on some areas of the island has now spread throughout Oahu. This is bad economic policy.

What we need is to "effectively enforce" our current laws on the many thousands of illegal vacation rentals we currently have. Anyone who tells you legalizing some is going to help to enforce our laws is, at best, incompetent.

Policy 10 should read: Enforce the current laws on vacation rentals in residential neighborhoods for the positive economic policy of having affordable housing for the residents of Oahu.

Mahalo for your help in keeping our residential neighborhoods residential,
Alex Ress
From: Paula
Sent: Sunday, May 07, 2017 5:53 PM
To: General Plan 2035
Cc: ianderson@hnl.gov
Subject: No to allowing visitor accommodation in non-resort areas

The General Plan speaks of providing affordable homes and rentals, yet permits small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand. Yes, the market will demand until there are no residential areas left anyone will want or afford. Will our educators, safety workers and business people commute from other islands?

“Ability to enforce effectively” is not happening now. Allowing visitor accommodations in non-resort areas will increase the need in a system already unenforced. Increasing the permitted visitor accommodations will cause even more degradation of our neighborhoods.

Effectively enforce the current ban on vacation rentals and bed & breakfasts in residential neighborhoods to bring down rental and housing prices for O'ahu's residents”

Paula Ress
Kailua, HI 96734
May 7, 2017

HELBER HASTER & FEE, Planners
733 Bishop Street, Suite 2390
Honolulu, HI 96813

Subject: Revision of O'ahu's General Plan

Dear Planners,

I have commented on your draft of O'ahu’s General Plan several times, the last time on April 11, 2013. At that time I commented extensively on a number of points, but particularly on Economic Objective B Policy 10. Along with this letter, I am submitting the enclosed copy of my earlier comments of April 11, 2013.

I also attended several of your public presentations on the proposed revisions to the General Plan. These presentations were purportedly held to receive and incorporate concerns and comments from the public into the revision of your draft. As you will recall, much time at these presentations was taken up by the public’s negative reaction to Economic Objective B Policy 10 to “permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively”.

In spite of major public opposition to Economic Objective B 10, expressed at meeting after meeting, this objective, to my great consternation, continues to appear in your final draft.

Your ignoring of the public input feeds public mistrust of our government and reinforces the perception that meetings soliciting public input are conducted only in order to satisfy the legal requirement for such meetings.

To further demonstrate community opposition to the City’s attempt to permit commercial lodging facilities in residentially zoned neighborhoods, I am also enclosing a copy of a letter sent to Mayor Mufi Hannemann on December 17, 2008, listing Neighborhood Boards, Organizations, Elected Officials and citizens who oppose permitting commercial lodging facilities in residentially zoned neighborhoods. Opposition to such legislation has not diminished since 2008. On the contrary, in the aftermath of increasingly obvious negative impacts on our residential neighborhoods, and on housing availability for our local population, opposition to such legislation has increased significantly. Please make this enclosure also part of my present testimony and of the record.

I am also enclosing a copy of my letter to Councilman Ikaika Anderson of January 30, 2015, listing some of the many reasons why short-term commercial rentals should not be allowed in residentially zoned neighborhoods. Please make this enclosure also part of my testimony and of the record.

Are we to sacrifice the safety and quality of life of our residential neighborhoods and affordable housing for our local people, as “warranted by market demand” for rentals in our residentially
zoned neighborhoods? Are we to satisfy this worldwide, insatiable, demand no matter what the price to our communities and residents? After what we have seen with your present final draft of the General Plan, is anyone still naive enough to believe that public input would really be taken into account in countering this demand? Given the City’s abysmal enforcement record, is anyone stupid enough to still believe that the City will ever enforce residential zoning laws?

The language in Economic Objective B 10 seeks to enhance the quality of the visitor experience at the expense of the well-being and quality of life of residents. It shows blatant disregard of the needs and concerns of the majority of our resident population. It shows a lack of vision for the present and future well-being of our residential communities, and the inherent rights of our residents. Have you given up on residential zoning and its benefits to our communities and families?

It is not only audacious to make the proposal in Economic Objective B 10 at a time when vacation rentals have already severely impacted the housing supply for our people, and many have to double or triple up, leave the state, or become homeless. It is also cruel and shows a lack of social responsibility. It also further diminishes the trust in your integrity.

In conclusion, please note once again my strong objection to the inclusion in the O’ahu’s General Plan of the objective of Economic Objective B Policy 10. My other comments made in the testimony submitted to you on April 13, 2013 also still stand.

As I have said before, it would behoove us all to pause and examine more carefully the long-term costs of the relentless push for more and more visitors versus the loss of housing and quality of life for our people, loss of sense of community, and other social, environmental, and cultural losses.

Sincerely yours,

Ursula Retherford

Kailua, HI 96734

Enclosures: Copy of comments on draft of O’ahu’s General Plan to HHP of April 11, 2013
Copy of letter to Mayor Hannemann re. vacation rental legislation of Dec. 17,2008
Copy of letter to City Councilman Ikaika Anderson on vacation rental legislation of January 30, 2015
April 11, 2013

HELBER HASTER & FEE, Planners
733 Bishop Street, Suite 2590
Honolulu, HI 96813

Subject: Revision of O‘ahu’s General Plan

Dear Planners,

First of all, thank you very much again for your work on the revision of the General Plan. Although there are a few areas that I feel still need improved revisions, I shall comment at length on one particular proposed change because, if left standing, it would have widespread negative effects on housing and on the quality of life for many local residents. That change is stated in the Economy Objective B - Policy 10 section. It proposes that we diversify the visitor experience by allowing options for visitor accommodations, including community hotels and alternative lodgings in non-resort zoned areas. At a meeting that I attended you admitted that your decision to introduce this change had been influenced by the number of demands for it expressed in your unscientific internet survey of summer 2011. This demand was made primarily by individuals who have a financial stake in this change. Many of the names of those asking for this change are familiar to me as operators of illegal short-term vacation rentals. Fifteen, or seven percent, of those who asked for the change did so anonymously, presumably not to be identified as illegal operators. The wish list of illegal operators of short-term visitor accommodations was given priority over the concerns of and recommendations by Neighborhood Boards and other organizations that represent whole communities. Those concerns were not given equal weight on this issue.

Although you were aware that the results of your survey were skewed by self-interest and did not represent the broad community, I partially understand that you felt you had to propose it given the large number asking for the change. However, I like to think that you did so in the hope that the public would react, and not because you believed that the financial interests of a particular group should be a determining factor in policy setting for an entire island population.

Having followed the illegal short-term vacation industry and its negative impacts on my community for more than twenty years, I can attest that the argument that more alternative visitor accommodations are needed to serve visiting family and friends is bogus. With some exceptions, these are not small Mom & Pop operations, but a well organized industry comprised of investors, many of them living off island. It advertises worldwide and is turning our residential neighborhoods into resort destinations. It changes our neighborhoods and undermines the quality of life and housing needs of our local residents.

I disagree with your contention expressed at the McKinley community briefing that the proposed change is an effort “to re-open the policy discussion about vacation rentals.” That debate took place at length over a number of years and was settled when, on December 17, 2009, the City Council voted not to allow alternative short-term visitor accommodations in residential areas (beyond the non-conforming units grandfathered in in 1989). I suggest that you review the numerous convincing testimonies presented at that time as to why these resort activities should not be allowed in non-resort designated areas. This is also not, as you asserted at the McKinley meeting, “another attempt by the Department to address the need for enforcement.” To the contrary, this is an attempt to open up the whole island to an industry that the City has not, in spite of the laws on the books, been able to regulate in the past, and will not, given the lack of political will and lack of staff and resources, be able to regulate in the future.
As to the Planning Commission hearing of August 2011 that you referred to in some of the community briefings, that hearing is in no way relevant to the option you are proposing in Policy 10. That hearing was not about expanding short-term visitor accommodations to non-resort areas. It was a Department of Planning and Permitting bill seeking stronger measures to enforce the existing law that prohibits the operation of these resort businesses in non-resort areas. The Planning Commission’s votes on that enforcement enhancement bill hardly support a conclusion that they should serve as support for your proposed option in Policy 10.

IN ADDITION, the proposed change in Economy Objective B - Policy 10 directly contradicts or is inconsistent with a number of policy statements found elsewhere in the General Plan draft revision.

Following are a few of the examples where Policy 10 conflicts with and undermines other policy statements:

PREAMBLE:
Housing: “Obtaining decent, reasonably priced homes in safe and attractive neighborhoods has been a perennial problem for the residents of O‘ahu, and a primary concern of the General Plan.”

The option and strategy offered in Policy 10 hardly present a solution to this problem. Policy 10 would ensure that this perennial problem would get much worse since rents and housing prices would escalate and neighborhoods would become less safe and less attractive.

I. POPULATION
Objective A: “To plan for future population growth in a manner that considers the limits of O‘ahu’s natural resources and that minimizes social, cultural, economic and environmental disruptions.”

Policy 10 does not minimize, but instead maximizes the social, cultural, economic and environmental disruptions. It is oblivious to the carrying capacity of this island and the impacts of the unlimited influx of tourism. The expansion of resort facilities and activities into our residential neighborhoods would change the character of these neighborhoods, disrupt and destabilize the neighborhood social safety net, and negatively impact the environment and the cultural values that are now nurtured in these neighborhoods.

II. THE ECONOMY
Objectives A & B seek the promotion of economic opportunities that enable all the people of O‘ahu to attain meaningful employment, provide a decent standard of living, enhances quality of life, and celebrates the unique Hawaiian sense of place and culture.

Policy 10 negates this noble pursuit. The jobs that would be generated by the proposed option to diversify the visitor experience are not very “meaningful” and do not provide for “a decent standard of living.” They pay low wages and do not provide any of the benefits, such as health insurance, sick leave, and other, that are provided to unionized hotel workers in most tourist establishments in resort zoning. These jobs also lack security and protection. Community hotels and other alternative visitor accommodations in non-resort areas would take away jobs that are more meaningful from present hotel workers.

Policy 10 does not enhance the quality of life for local residents in residential neighborhoods. Much to the contrary. The character of neighborhoods is changed as many homes are converted to resort business use. The sense of community is lost and there is a decline in community participation and volunteerism. There is a loss of the privacy, tranquility, and safety that traditionally are integral parts of residential living. It violates the rights of people who bought into residential zoning because of its qualities. It renders Neighborhood Watch programs meaningless as streams of strangers replace neighbors. (This has been
well demonstrated by the present operations of illegal visitor accommodations in residential neighborhoods here in Kailua.)

Policy 10 also does not celebrate the unique Hawaiian sense of place and culture. There is nothing to celebrate when local Hawaiian people, and other residents, see their neighborhoods exploited for financial gain, which markets them out of their homes and places where they have been nurturing their culture. Their sense of place is destroyed, replaced, and celebrated for financial gains that are reducing their neighborhoods' character and identities to marketable objects, a market in which Hawaiian people and many other local residents can no longer compete, be it for home ownership or for rentals or for places that accommodate the practice of their cultural traditions.

I could not agree more with your rationale under Objective B that tourism should be in balance with residents’ needs. However, Policy 10 fails to ensure that balance. Residents’ needs are for residential neighborhoods in which they can live and bring up their families in wholesome, safe, and peaceful surroundings, away from the eight million visitors that descend on our island annually. These neighborhoods provide protection, a needed refuge, and an opportunity for residents to renew their spirits away from the hustle and bustle of resort accommodations and activities.

III. NATURAL ENVIRONMENT

Policy 1: “Protect O’ahu’s natural environment, especially the shoreline, valleys, ridges and watersheds from incompatible development.” (Also see Objective D - Policy 8 of the Health and Education section).

Community hotels and alternative visitor accommodations in non-resort areas would invariably also gravitate to the shorelines. Policy 10 represents incompatible development as it would further increase recreational activities that adversely impact the natural environment and that result in overcrowding and overuse of beaches, shoreline areas, and the ocean.

IV. HOUSING

Objective A: “To ensure a wide range of opportunities, choices and prices for all residents.”

Policy 10 fails to ensure a wide range of housing opportunities, choices and prices for all residents. On the contrary, it causes the prices of homes and rents to increase, driving local residents out of the market, limiting their choices, and causing them to double and triple up, and live in crowded and undignified conditions, if not in homelessness. A quote from another planning document reads, “any large scale changes which significantly increase rents or property taxes may displace a significant number of lower-income families and workers.”

The change that Policy 10 proposes is large and would significantly increase rents and property taxes, which would displace a significant number of lower-income, as well as middle-income, workers and their families.

The option in Policy 10 would contribute to the exodus of young people who are forced to leave the island because they cannot afford to live and bring up families in the place where they were born. It contributes to an ongoing brain drain that we cannot afford, especially if we are ever to develop alternative industries that reduce our dependency on tourism. In addition, the cost of housing and rents and the declining quality of life in residential neighborhoods hurt the ability of businesses, government agencies, and educational institutions to compete for and attract to this island top talent from elsewhere. Consequently, it also contributes to our steady march towards mediocrity.

Policy 1: “Support programs, policies and strategies which will provide decent homes at the least possible cost.”
Policy 10 does not represent a strategy that would provide decent homes at the least possible cost. On the contrary, its strategy increases the cost of homes and rentals and pushes many local residents who cannot compete with the tourist market into crowded and far less than decent living arrangements and surroundings.

**Objective B:** “To reduce speculation in land and housing.”

Policy 10 does not reduce speculation in land and housing. On the contrary, its proposal to open up the entire island to lucrative resort accommodations fuels speculation by investors to the detriment of affordable housing and quality of life for many local residents.

**VI. ENERGY**

**Objective A:** “To increase energy self-sufficiency and maintain an efficient, dependable and economical energy supply.”

**Policy 1:** “Encourage the implementation of a comprehensive plan to guide and coordinate energy conservation and renewable energy development and utilization programs.”

Policy 10 contradicts this plan. It carries with it a great increase in energy consumption. While most of us in residential neighborhoods rely on the cooling of our homes by the tradewinds and ceiling fans, my observation is that present alternative visitor accommodations, almost without exception, have air conditioners popping out of every bedroom window. This high energy consuming alternative to the natural ventilation of our island homes is an expectation of the vast majority of visitors to our tropical island. That is not energy conservation. (Some neighbors living in close proximity to presently operating short-term vacation rentals have been complaining about the noise of air conditioners and about the hot air from the air conditioners that blows into their homes through their open jalousie windows.)

**Objective B:** “To conserve energy through the more efficient management of its use.”

**Policy 1:** “Ensure that the efficient use of energy is a primary factor in the preparation and administration of land use plans and regulations.”

**Policy 2:** “Provide incentives and, where appropriate, mandatory controls to achieve energy-efficient siting and design of new developments”

In your rationale for change, you name natural ventilation as one of the strategies to reduce energy consumption.

Policy 10 encourages the use of energy rather than conservation. The expansion of alternative visitor accommodations into other than resort zoned areas represents a new land use of our residential neighborhoods. This use carries with it demands by visitors for air conditioned facilities, instead of relying on natural ventilation. This is not efficient management of energy conservation.

**VII. PHYSICAL DEVELOPMENT AND URBAN DESIGN**

**Objective A:** “To coordinate changes in the physical environment of O’ahu to ensure that all new developments are timely, well-designed, and appropriate for the areas in which they would be located.”

The proposal in Policy 10 that would allow community hotels and residential homes and investors’ mansions to operate as resort inns represents a new physical development and a new form of land use of residentially
zoned areas. It is a development that is neither timely, nor well-designed, nor appropriate for the areas in which it would be located.

Policy 2: “Coordinate the location and timing of new development with the availability of adequate infrastructure.”

One factor in your rationale supporting this policy is community concerns that public infrastructure investment does not always parallel the pace of private development.

While your rationale is quite correct, Policy 10 ignores it. The whole infrastructure for our old residential neighborhoods is based on single-family use. The present illegal short-term visitor lodgings that operate as resort inns and the influx of tourists in our residential communities are already overwhelming our infrastructure. Policy 10 would greatly aggravate the situation. The infrastructure of residential areas simply cannot accommodate resort development without undertaking significant, and costly, upgrading. Nowhere do you propose that such upgrading would be a prerequisite for the considered option in Policy 10.

Policy 9: “Exclude from residential areas uses which are major sources of noise.”

Policy 10 would bring major sources of noise into our residential areas. Visitors arrive at all hours of the day and night. They are on different time zones and sleeping schedules. They are here to have a good time. They enjoy the swimming pools in the middle of the night, party, and talk on their cell phones to friends living in different time zones, while they sit in patios and backyards that are often located as little as 6-10 feet from single-wall constructed homes with open jalousie windows, and where residents who need to be up early in the morning for work or school are trying to get some sleep. (The City has not been willing or able to address and regulate the noise emanating from present short-term vacation operations.) Policy 10 would further increase the noise from resort operations that are in such close proximity to the homes of local residents.

Objective D: “To maintain those development characteristics in the urban-fringe and rural areas which make them desirable places to live.”

Our residential neighborhoods and rural areas are the desirable places for our resident population to live and raise their families in supportive, quiet, safe, and wholesome surroundings. Policy 10 and the expansion of resort accommodations into these neighborhoods would destroy rather than maintain the characteristics of the neighborhoods and greatly reduce what makes them desirable.

Objective E
Policy 1: “Encourage distinctive community identities for both new and existing communities and neighborhoods.”

Our residential communities and neighborhoods have distinctive identities and characteristics cherished by their residents and which they try to maintain and enhance. Rather than encourage, Policy 10 would destroy the characteristics and distinctive identities of residential communities and undermine efforts of the residents to maintain and nurture them.

Policy 3: “Require developments in stable established communities and rural areas to enhance the existing communities and areas.”

In your rationale for supporting this policy, you stated that it was in response to community concerns about changing neighborhood character.
Indeed, communities are deeply concerned about the ways that resort use of their residential neighborhoods changes their character. Policy 10 flies in the face of the Policy 3 requirement. The expansion of resort development into stable established communities would destroy rather than enhance the existing character of these communities and areas. Policy 10 is the antithesis to this Policy 3.

VIII. PUBLIC SAFETY
Objective: “To prevent and control crime and public order.”

Policy 1: “Provide a safe environment for residents and visitors on O’ahu.”

Policy 10 does not provide a safe environment for residents. It would bring a steady stream of strangers to our neighborhoods, increasing the anxiety of many parents about letting their children walk alone a block from home. (This is already happening here in Kailua due to the proliferation of vacation rentals.) It renders Megan’s Law meaningless. People feel safer when they know their neighbors and know the people who are circulating in their neighborhood.

Policy 10 also attracts the criminal element to our neighborhoods. The present visitor accommodations here in Kailua are well known to criminals, and the visitors are easily identifiable by their rental cars. Resort accommodations in our residential communities and neighborhoods bring criminals close to our homes. Visitors are easy targets and are not here long enough to prosecute. When the criminals targeting visitors are in our neighborhoods they also expose us neighbors to increased risk. (I have personal experience in this matter. I suggest you also follow the crime statistics for Kailua on thefts from visitors.)

Policy 5: “Establish and maintain programs to encourage public cooperation in the prevention and solution of crimes.”

As mentioned earlier, Policy 10 renders the Neighborhood Watch program obsolete. This program encourages public cooperation in the prevention of crime. Neighbors watch each other’s homes and report to each other suspicious activities or the presence of individuals who are not usually part of the neighborhood. With the constant coming and going of strangers, sometimes looking for the address of the vacation rental, we do not know whether they are casing the neighborhood or are innocent users of our illegal short-term visitor accommodations. We no longer know many of our neighbors, and this represents a loss of a sense of security in our own homes and on our neighborhood streets. Policy 10 would compound that loss of safety since it makes neighbor-to-neighbor cooperation in crime prevention almost impossible.

Other related Information
A statement from the City’s Tourism Focus Group Meeting of September 10, 2004, emphasizes that the updated General Plan should “prioritize residents’ needs above tourism”, and “should address tourism from the residents’ perspective, and include a clear objective statement that the “well-being of O’ahu’s residents is paramount.” These statements contrast sharply with a number of other conclusions from that meeting, such as “The perspective of needing to ‘control’ the growth of tourism’s physical plant is no longer needed” and, “small community-based hotels (or inns) may be an appropriate mechanism to accommodate the market”, and further, "other models - such as the community tourism model (where the community becomes part of the visitor experience) should be considered as possible approaches to maintain Hawaii’s viability. The community tourism model is one way to integrate the Native Hawaiian culture with tourism.” Residents are treated here more like pawns, or moveable parts, in the tourist marketing scheme, rather than as people whose welfare should be “paramount”, and whose perspective should be respected and honored. The focus group ignores the fact that much of our island population cherishes the privacy and serenity of their residential neighborhoods and do not desire to become “part of the visitor experience”. I also doubt that many proud Hawaiians concerned with the perpetuation of their culture in an authentic and pure form would embrace the idea of having their culture and neighborhoods used as suggested in the above community tourist model.
The suggestion by the focus group that we use Portland as a good example of a city that balances tourist needs with the needs of the local population is oblivious to the fact that Hawaii is a very different place. Unlike Portland, we are a small island in the middle of the Pacific ocean with limited habitable land, fragile resources, and very different needs. O‘ahu has a population of less than one million people competing for housing and preservation of our quality of life, and the survival of a native culture under the onslaught of more than eight million tourists a year. This is quite a different scenario compared to Portland!

We could also compare the balance of tourist needs with the needs of the local population in the tourist area of Switzerland where I was born and grew up. But again, like Portland, it would not make much sense because the places are very different, and so are the solutions to the problems. This does not mean that we should not look at other areas for ideas. However, we need to recognize that our place is very different and presents unique challenges. Solutions from elsewhere are often not applicable to our unique challenges. The sooner we recognize and accept that fact, the better.

SUMMARY AND CONCLUSION

The above are a few, but by no means all, examples of where Economy Objective B - Policy 10 directly contradicts or is inconsistent with other policies found in your draft revision of the General Plan. Although you have made some good revisions, for which I thank you, my feeling is that the concern for the well-being of the visitor (tourist) and for the interests of the tourist industry outweighs the concern shown for the interests and long-term welfare of much of our island resident population. While concern for the enhancement of the visitors’ experience is repeated again and again throughout much of the draft revision, concern about how the experience enhancements for visitors affects the experience of the well-being of the host culture and its residents is very much secondary. You seem to look for ways to improve the visitor experience and gains for the tourist industry without adequately examining the social, cultural, and other costs that the continued expansion of tourism brings to many local residents. You are increasingly moving away from the concept of protecting the integrity of residential neighborhoods. Doing so has long-term negative consequences that do not bode well for the future of this island, neither for residents nor for the tourist industry. (Note that resentment towards tourists is evident and increasing in residential communities plagued with visitor accommodations. ) There is something wrong with us when we allow our economic policies to negatively impact our quality of life and displace local residents in order to provide alternative experiences for visitors.

With my due respect to you as planners, what seems to be missing in parts of the draft revision of the General Plan, especially in Economy Objective B - Policy 10, is a greater understanding and better analysis of social, cultural, economic, and environmental impacts, and the apparent lack of input by experts in the social science and related fields.

The established policy of restricting visitor accommodations to specific areas of the island zoned for resort use was thought out wisely and has served our island well. It protects our agricultural land, our residential housing supply, our rural and residential communities’ character, our culture, and the social elements that help generate the prized commodity of our tourist industry, the Aloha spirit. Please do not change this established policy.

The proposed change in Economy Objective B - Policy 10 is not a compatible land use of residential and other non-resort designated areas. As evidenced in a number of your community briefings, there is great community concern and unhappiness about this proposed change. My strong recommendation is that you delete this contradictory policy change from your draft revision of the General Plan lest it monopolize future hearings at the expense of other important aspects of the revision that deserve and need to be discussed.

Thank you very much for considering the points I have made in this lengthy commentary.
With my Aloha,

Ursula Retherford

Kailua, HI 96734

cc: George I. Atta, Director of the City Department of Planning and Permitting
Wednesday, December 17, 2008

The Honorable Mufi Hannemann,
Mayor, Honolulu County
Honolulu Hale
530 South King Street
Honolulu, Hawai‘i 96813

RE: Council Bills 6 & 7

Dear Mayor Hannemann,

We are troubled to see the Honolulu City Council advance legislation that would permit commercial lodging facilities in residentially zoned neighborhoods. How and why can this be happening? It flies in the face of overwhelming public opposition, including the unanimous "no" vote from the Honolulu County Planning Commission, the written opposition of eight of the currently most impacted Neighborhood Boards and of numerous community associations on Oahu, 1,700 petition signatures from citizens, and similar opposition as voiced by both O‘ahu hotel worker’s unions and by elected state officials. The growing list of entities that have thusfar voiced opposition to this proposed legislation include:

NEIGHBORHOOD BOARDS
Kuli‘ou‘ou/Kalani Iki Neighborhood Board No.2
Waialae/Kahala Neighborhood Board No. 3
Diamond Head/Kapahulu/St. Louis Neighborhood Board No. 5
Waianae Neighborhood Board No. 24
North Shore Neighborhood Board No. 27
Koolauloa Neighborhood Board No. 28
Kailua Neighborhood Board No. 31
Waimanalo Neighborhood Board No. 32

ORGANIZATIONS
ILWU Local 142
Unite Here Local 5 AFL-CIO Hawai‘i League of Women Voters-Honolulu

The Institute for Human Services
Punalu‘u Community Association
Waimānalo Beach Lots Association
Livable Hawai‘i Kai Hui
Save Oahu’s Neighborhoods Hawai‘i
Lanikai Community Association
LaniKailua Outdoor Circle
Keep it Kailua

ELECTED OFFICIALS
Senator Carol Fukunaga
Senator Fred Hemmings
Senator Ken Ito
Representative Lyla Berg
Representative Michael Magnoay
Representative Cynthia Thielen
Representative Gene Ward

Please note that No Neighborhood Board and no community association has come out in support of the proposed legislation.

It is perfectly clear to those being forced to live with the many negative ramifications of this proliferation of illegal B&B establishments in our neighborhoods that such a careless
change in the law would forever and negatively alter the character of Oahu's residential neighborhoods. Therefore, we are appealing to you as the Mayor of the City & County of Honolulu to oppose allowing commercial lodging businesses to operate in our residentially zoned communities, and that you request the City Council to reject the current Bills 6 & 7.

We were pleased to hear that you support better enforcement of the existing law because we know from our firsthand experience that your Department of Planning & Permitting (DPP) can do the job. They have done it before in some neighborhoods with great success. We would suggest that you support giving them the easily-applied additional enforcement tools proposed in Bill 8. As background, in 2005, Bill 8 proposed to give the Honolulu DPP more enforcement power over these scofflaw businesses now operating in neighborhoods zoned "residential" by requiring that a permit number and street address be published in all Vacation Rental and B&B advertising. Because of the added ease of tracking such ads that this simple amendment would enable, far less enforcement efforts would be expended by the arguably overworked DPP. Had Bill 8 been passed three years ago, none of us would again be wasting our precious time on the matter. However, for whatever reasons, the Honolulu City Council has instead chosen to try and legalize all of these illegal mini-hotel businesses via Bills 6 & 7.

We have included, below, a brief list of why the Council's proposed changes in the existing law should not occur:

- Bill 6 and 7 breach the promise made by the City Council to the community in 1989 that there would be no more permits issued in the future for the operation of Bed & Breakfast and Transient Vacation Units in residential neighborhoods.
- Bill 6 and Bill 7 would reduce Oahu's already critical residential housing inventory and the supply of affordable rentals for residents.
- Bill 6 and Bill 7 represent massive spot zoning and fly in the face of sound planning. They are inconsistent with the public policies of the General Plan and many of the Sustainable Communities Plans.
- Bill 6 and Bill 7 force neighbors to live next to commercial businesses and violate their rights under the residential zoning into which they bought.
- Bill 6 and Bill 7 compromise the safety of our residential neighborhoods by undermining security watch programs and Hawaii's neighborhood sexual predator registration (Megan's) law.
- Bill 6 and Bill 7 contribute to a growing resentment of residents who believe Oahu is run for tourists at the expense of locals. This causes increasingly unfriendly attitudes towards visitors that are harmful to our entire tourist industry.
- Bill 6 and Bill 7 cause unfair tax assessments for homeowners because income-producing visitor accommodations in the neighborhood sell for higher prices. At the time of sale the homes near undesirable commercial activities suffer an unfair loss.
• Bill 6 and Bill 7 would change our neighborhoods forever, threaten the survival of our local culture and way of life, and undermine the aloha spirit.

• Bill 6 and Bill 7 are counter to the public interest.

For these, and other important reasons, we respectfully ask you, Mr. Mayor, for your assistance in rejecting Bill 6 & 7 and we look forward to your kind response to.

Elizabeth Reilly at:

Sincerely,

Diane Anderson
Jean Aoki
Larry Bartley
Marilyn Bornhorst
Don Bremer
Kathy Bryant-Hunter
Rich Carvill
Tom Cestare
Susan Cummings
Phil Estermann
Sam Fisk
Philip R. Foti, MD
Reid Fujita
Grace Furukawa
Karen Geary
Bob Hampton
Rev. John Heidel
Larry Johnson
Piilani Kaopuiki
Peter Kay
Harvey King

Al Lewis
Lisa Marten
Janet Mason
Michelle S. Matson
Elizabeth G. Matthews
Dennis McEerath
Art Mori
Jim Monier
Creighton Mattoon
Wilmer C. Morris
Rev. Bob Nakata
Kathleen M. Pahinui
Lunsford Phillips
Richard Port
Lucinda Pyles
Elizabeth Reilly
Claire A Shimabukuro
Stuart Simmons
Jojo Watumull
Donna Wong
Sally Youngblood

And the attached list of islandwide residents.
January 30, 2015

The Honorable Ikaika Anderson  
Chair, City Council Committee on Planning and Zoning  
530 S. King Street  
Honolulu, HI 96813

Subject: Transient Vacation Rentals

Dear Councilmember Anderson,

This is in response to the Star-Advertiser article (1/3/15) in which you solicited public input regarding transient vacation units operating in our residentially zoned neighborhoods.

I have been involved in this issue since 1989, and over the years I have testified on the subject numerous times. As you therefore are already aware, I believe these resort activities are incompatible with residential zoning and the needs and rights of permanent residents. They impact the very core values of residential living. In the Cummings versus Roth case, Judge Sabrina McKenna (now a Hawaii State Supreme Court Justice) referred to the fact that Roth’s illegal bed-and-breakfast operation altered the residential character of a residential neighborhood and ruled that “the public interest clearly supports the granting of injunctive relief.”

The demand by the transient vacation rental industry, the Star-Advertiser, and seemingly also some members of the City Council, that the moratorium on new permits be lifted, clearly does not support the public interest, nor does it grant relief to the impacted neighborhoods. These resort activities have the same negative impacts on residents and their communities whether they are legal or illegal. They belong in resort zoning.

The Star-Advertiser editorial of 1/4/15 stated that “Technology has made it all but impossible for the city to enforce the ban that’s been on the books – for more than 25 years, since a moratorium on new permits for vacation rentals was enacted.” I would first like to correct the notion that there never was a moratorium. A “moratorium” is a temporary suspension of activity, which is not what the 1989 legislation was about. The reason for issuing Non-Conforming Use Certificates (NUCs) in 1989 to operators who could show that they had been in business since 1986 was that, because there was no specific language in the law forbidding such rentals at that time, the City feared legal action if it closed them down. The City Council, however, acknowledged the negative impacts of these short-term visitor accommodations on residential neighborhoods and promised us that no more NUCs would be issued in the future, and that those issued at the time would be phased out by attrition. This is a far cry from a moratorium.

Contrary to the claim that technology (internet advertisements) has made it more difficult for the City to enforce the ban, in reality it has made it easier by better enabling the City to trace and apprehend violators. The City, however, opted not make use of the help offered by the new technology. It ignored proposed legislation which would have required that the Non-Conforming Use Certificate number and the address of the vacation rental unit be listed in internet advertisements. Such a listing would have been a great help to the City in sorting legal operations from illegal ones and effectively enforcing the law. The City lacked the political will to enact this helpful legislation and to make use of still other available tools to successfully
prosecute violators. Instead it let the industry proliferate. It closed its eyes and ears and ignored the pleas and complaints of residents and the deterioration of their neighborhoods. While lamenting the lack of housing for our local people, it stood by, watching the selling out of thousands of housing units in our neighborhoods to higher-bidding visitors in search of alternative vacation experiences and thereby contributing to soaring rents for local residents.

Although acknowledging the supposed impotence of the City to enforce its own laws, the Star-Advertiser in its January 4th editorial calls for a pathway to give the “scofflaws” legal status, “one that emphasizes strict rules about how these accommodations should be maintained and supervised.” I strongly disagree with this proposal. What would make anyone think that the City would do a better job in enforcing future laws than it does present laws? Where would the strong supervision come from? An e-mail from an impacted resident, who has provided DPP with proof of at least twenty-five illegal stays, illustrates the present degree of enforcement. It reads in part, “Between the photographic evidence and our testimony in the past, we have given them a clear case served up on a silver platter, and they never do anything about it. I’m not optimistic that they ever will.” There are, indeed, no indicators that would justify thinking that the City would do a better job in enforcing future laws, especially given the City’s financial predicament and budget constraints looming on the horizon. The adherence to rules and regulations would, as in the past, be left to the vacation rental operators (i.e., to the “hoteliers”, as the Star-Advertiser calls them). It would be self-regulation with the same kind of benefits to themselves and negative consequences for the community that we have seen, to our sorrow, with the so-called “self-regulating” Wall Street financial industry.

While the City has not enforced the law on illegal operations, neither has it enforced the law pertaining to legal operations with 1989 NUCs, which have been violating the conditions of their certificates right and left, and this in spite of complaints by neighbors. Given the City’s abysmal record of enforcement, it is clear that no matter how many illegal operations the City would legalize in the future, even more illegal ones would spring up as our residential neighborhoods continue to be advertised world-wide as playgrounds for tourists.

What seems to be uppermost in the minds of government officials is the possible lack of payment of appropriate taxes, such as TAT, by transient vacation rental operators. The Star-Advertiser editorial of 12/29/14 agrees with the statement by the president and CEO of the Hawaii Lodging and Tourism Association who said, “We aren’t trying to put anyone out of business. If people want them, I say give them to them. However, they need to pay their fair share of fees and taxes. We want a level playing field.”

This statement is troubling. Does the payment of fees and taxes confer the right to alter and negatively impact residentially zoned neighborhoods without going through the legally required rezoning process that must take into account infrastructure and other social, economic, environmental, and cultural impacts? This issue is about much more than fees and taxes. It is about the rights of people who bought into residential zoning and their quality of life.

On the issue of potential revenue, I believe the projected amount of GET and TAT that would be collected if illegal operations were legalized is exaggerated. The projected collections naively assume trust and honesty, qualities that do not seem to be in great abundance in an industry that has been taking the law into its own hands for many years. Just as in the past, be it a legal or an
illegal operation, the operator would decide the amount of income on which he or she would pay taxes. An illustration: As some vacation rental units are located only a few feet from neighbors with jalousie windows, a friend of mine overheard an operator discuss what portion of the collected revenue he would declare and pay taxes on. I do not believe this to be an isolated discussion. In other cases, who would check the validity of claims that the visitors were simply non-paying friends? When I found a stolen cell phone in my yard and tracked it to a family in California who had stayed at an illegal vacation rental around the corner from me, the operator of the vacation rental assured me that these were “just friends” who stayed with him. The California family informed me, however, that they were not friends and had found the rental on the internet and had payed $2400 for a five-night stay. I believe that far more TAT would be collected if these “friends” stayed at traditional hotels, virtually all of which have rigorous accounting systems entailing honest collection and payment of the TAT. Let us also not forget that the same rental units if rented long term to local residents would assure a far more reliable source of the GET. They would also be rented to people who would be able to reside and work here and pay state income tax.

A myth that seems to persist and apparently convince some Council members that we should legalize more transient vacation rentals in residential neighborhoods is that the operators of these businesses need our help with their mortgages. Of the many illegal vacation rental operators that I know of, not a single one seems to be needing our help. In my neighborhood these illegal rentals are owned by real estate professionals, a restaurant owner, a contractor, investors, and other well established persons. On the whole, illegal vacation rentals do not tend to be located in neighborhoods where the biggest help with mortgages is needed, but rather in neighborhoods where people are already doing pretty well and do not need the City to help them do even better. That is, unless they bought a property that they knew they could not afford without running an illegal vacation rental, and bought it anyway because they were confident, given the City’s enforcement record, that they could get away with it. I am familiar with some fine examples of such behavior by leaders in the illegal vacation rental industry.

One also hears of cases where owners, especially older owners, allegedly cannot afford the high taxes on their properties without operating a vacation rental business. Therefore some think we should help them by legalizing their operations. But these same older people could rent out the same units longer term to local residents. A reverse mortgage is also an option. And in any case it is not the City’s responsibility to safeguard inheritances by sacrificing the quality of life of our residential neighborhoods.

There is concern by some about the effect on retail businesses if the many illegal vacation rentals were not allowed to continue. Yes, there probably would be some effect. But then, are we in the business of subsidizing with our quality of life businesses that speculated by setting up shop based on income from illegal vacation rentals? Anybody who after 1989 started a tourist-dependent business in the high impact areas of Kailua and the North Shore knew, or should have known, what the law was and the risks involved. Unless, of course, they too knew that they could out-smart the City. The City officials should feel, if not angry, at least embarrassed to be taken for fools so often.

Another justification cited for allowing more vacation rentals in our residential neighborhoods is that it creates jobs. Yes, it creates some jobs, mostly jobs without benefits of any kind, while
taking away many good and stable hotel jobs that provide workers with health insurance, sick leave, vacation time, employer contributions to Social Security, and other benefits.

The Star-Advertiser (1/4/15) points out that as a result of the vacation rental industry, communities have changed, and goes on to say, "Their permanent residents, who deserve some measure of control over their own living conditions, are powerless to act against it." This is a sad commentary on a City government that, by its lack of political will and inaction, has rendered its citizens powerless against the forces that destroy their quality of life and taken away needed housing from them.

Many of us do not intend to remain powerless. We, too, want a level playing field. We do want a measure of control over our living conditions. We do not want additional transient vacation rentals beyond those presently holding Non-Conforming Use Certificates. We do not want our neighborhoods to be tourist industry market places and playgrounds. We do not want mini hotels and "hotels". We want neighborhoods where we have neighbors, a social safety net, a safe place to bring up our children, and a place of respite from the impacts of the 8+ million tourists that descend on our small island every year. We want to retain some sanity. We want nurturing, neighborhoods of caring and engaged citizens. We want cohesive, neighborhoods that provide our communities with volunteers, not profiteers. We want harmonious neighborhoods that don't pit neighbor against neighbor. We want rentals in our neighborhoods that provide homes for our local people. We do not want our housing inventory eviscerated in order to accommodate the wishes of the tourist industry and associated interests, while relegating our local people to crowded living conditions or living on the street.

The above can be accomplished by simply enforcing existing laws. This would free up thousands of rental units at lower rents for our local people, serve the public interest, and bring relief to our impacted neighborhoods and communities.

We should pay far greater attention to the cultivation of positive experiences for our visitors in our resort-designated areas, such as Waikiki. It is no wonder that many visitors seek to have a Hawaiian experience by seeking alternative accommodations in our residential neighborhoods, as they cannot find it in the overbuilt, crowded, and depersonalized Waikiki. But we do not want our residential communities to become the next victims and before too long be stripped similarly of our Hawaiian sense of place and identity.

Much thought and work by good men and women of long-range vision went into our development plans that divide the island into zoning categories and call for the protection of our residential communities. The spot zoning, the "laissez faire" attitude, and the "if people want them, give them to them" philosophy fly in the face of our development-guiding documents and sound planning. In fact, they represent no planning at all, which for a small island of limited and fragile resources is not a wise path to take.

B&Bs/Short term vacation rentals make sense in many parts of our country and the world. However, we are not like any other place. Hawaii's many unique characteristics and differing circumstances and needs make resort accommodations in our residential neighborhoods incompatible with the quality of life that local residents deserve and that is mandated by current
Our quality of life, the very quality of our citizens, and the survival of native culture and its aloha spirit all depend on safe, healthy, and wholesome neighborhoods and communities. It is not the exploitation for financial gain, but the protection of our residential neighborhoods and investments in their social capital that will promote the general welfare of all of us on this island, including the tourist industry.

I believe that it would behoove all of us to pause and examine more carefully the long-term benefits of the relentless push for more and more visitors versus concomitant social, environmental, and cultural losses.

I shall close with excerpts from an e-mail to DPP, a copy of which I received this morning:
“Today another group of renters from Canada, approx. 14-16 people checked in... The owner is becoming more bold in his defiance of the law having had 4 separate renters since Xmas. I have been at this for a number of years, with no results and would love to have my neighborhood back.”

I hope that you and the other members of the Council and our Mayor will have the vision, wisdom, and political will to return our neighborhoods to the residential use for which they are zoned and confine transient vacation rentals to resort-zoned areas.

Thank you very much for considering my input.

With my aloha,

Ursula Retherford

Kailua, HI 96734

cc: The Honorable Councilmembers:
  Ernie Martin, Chair
  Kimberly Pine
  Trevor Ozawa
  Ann Kobayashi
  Carol Fukunaga
  Joey Manahan
  Brandon Elephante
  Ron Menor

  Honolulu Mayor, the Honorable Kirk Caldwell
  George Atta, Director of the City Planning and Permitting Department
  Editor of the Honolulu Star-Advertiser

5
Comments Regarding
General Plan 2035 Draft 2
submitted by Cynthia K.L. Rezentes

**Other Offshore Islands and Marine Waters (page 12)**

- Miles should be referred to as nautical miles as the distance measurement is not the same for both (1 mile = 0.869 nautical miles therefore 3 nautical miles = 3.4523 miles) and the Bureau of Ocean Energy Management refers to their jurisdiction (the Outer Continental Shelf or OCS) as 3 – 200 nautical miles

**Population (page 18)**

- Policy 4 – I am concerned that this plan continues to identify that the Waianae Policy Area will continue to host 5% of the population (no matter the number of residents on the island). That along with the `Ewa numbers equates to 21% of the total island population that will be in the relatively isolated areas that are also part of the drier areas of the island.

Currently, the Waianae Coast imports potable water as there is not enough water to pump from groundwater sources within the area to satisfy the needs of the population. With continuing to allow the increase of numbers of residents within the area, the importation of water becomes continually challenging to access potable groundwater or would probably, eventually require desalination facilities to provide enough water for the region.

In addition to allowing the population to continually increase in the Waianae Policy Area, the plan does not acknowledge the continuing challenge for transportation access during times of emergencies or even for normal day-to-day access.

There should be a study performed for the carrying capacity of the various Policy Areas and the Distribution of Residential Population should be identified accordingly.

**The Economy (page 22)**

- Policy 10 – To this date, the City and County of Honolulu has not demonstrated the ability or willingness to “enforce effectively” non-approved visitor accommodations in non-resort areas. What will be done to rectify this situation so that this Policy becomes meaningful for residents?

**(page 24)**

- Policies 1 and 3 appear to be contradictory. While encouraging the fishing industry to maintain its viability that does not degrade or damage marine ecosystems we are also encouraging the expansion of ocean recreation activities for residents and visitors. We already know that over the years, with the increase of ocean recreation activities (e.g. dolphin watching) that the boaters behavior actually does impact the ability of the fishing industry to maintain their viability much less not degrade or damage the marine ecosystem. With the continuing pressures to provide visitor experiences such as dolphin tours, swim with the dolphins, snorkeling offshore, etc. the inherent ability to access these activities cross fishing grounds disturbing patterns of fish behavior thus impacting the ability of local fishermen to continue with their trade in providing us fish to consume. There needs to be further evaluation of the impacts of expanding ocean activities for residents and visitors.
Natural Environment and Resource Stewardship (page 28)

- Objective B – Provides for the preservation and enhancement of natural landmarks and scenic views. This statement should be re-examined as we are losing many of our famous/recognizable landmarks through the developments approved within Honolulu proper. For example, Diamond Head used to be visible from various vistas in Honolulu and today it is mostly blocked by high-rises. Even when viewing Diamond Head from various locations along the H-1 Freeway, you can see a noticeable change in the visible landscape, including Diamond Head. Another example includes the drive from the Westside towards Honolulu and the landscape changes visible due to the KoOlina Resort development. This statement should be re-visited and worded more appropriately.

- Policy 4 – Promoting public access to natural environment for recreation, educational and cultural purposes is commendable but how to manage is the concern. With the increase in visitors wanting more “natural” experiences and the preponderance of information on social media sights, many of our locations are under stress and attack from look-sees. A stronger statement regarding protecting these resources and managing them under the critical damage load is required.

Housing and Communities (page 29)

- Policy 9 – Where does this apply? Is this for the PUC and SUC or all areas of the island? Does this include Waianae, Hau’ula, Kahaluu? What is the intent here and where will this be applicable?

Transportation and Utilizes (page 34)

- Objective B – Is Waimanalo Gulch Sanitary Landfill an environmentally sound system of waste disposal? What about the effects of rising sea levels on our wastewater treatment facilities located near coastal waters? You provide no statement regarding whether this plan is supposed to address our wastewater treatment facilities’ locations before it becomes a critical issue.

- Policy 4 – While this policy is commendable, until you address the above (wastewater treatment plant locations) this will be difficult to accomplish on a large scale basis. The Waianae Wastewater Treatment facility was evaluated to be able to provide non-potable water to our beach parks but was rejected due to the high salinity level in the treated wastewater and the high costs of removing the salts in the water.

(Page 35)

- Objective D – Is this for the entire island? Seems like this is done on an as demanded request. Utility systems that will be impacted by rising sea levels do not seem to be addressed proactively. It appears that it will be addressed when it must be addressed versus advanced planning.

Energy (pages 37-38)

- Policy 3 – Is this really needed considering the State target for 100% renewable energy? Will there be any action taken on this before it becomes “obsolete”. How much is adequate fossil fuel supplies, i.e. one days’ worth of power generation, one days’ worth of fuel for vehicular traffic, etc.?

- Objective C – At what point will it become more costly to conserve energy than to use it? Today we use compact fluorescent light bulbs (CFLs) or LED bulbs to reduce waste and energy use at a higher cost than incandescent bulbs. At what point will it become more costly for residents and businesses to attempt to “save” energy at the higher cost of equipment (whether consumer cost
or cost to manufacture.) Will this take into account the actual cost of “saving energy”? How much does it cost to manufacture an energy saving device versus one not designated as such? For example, does it take more energy to make an LED bulb than an incandescent one? What is the true energy cost trade-offs for the products and the consumer?

**Physical Development and Urban Design (pages 39-40)**
- Objective A/Policy 2 – Jobs should also be included in the review of coordinating the location and timing of new developments. Other items should include property availability for schools.
- Objective C/Policy 6 – How is this to comply with Objective B earlier in this section to plan and prepare for the long-term impacts of climate change?

**(Pages 41-42)**
- Objective D/Policy 6) Does this include boat repair facilities included in the maritime commercial center? May need further clarification as to what is meant by this statement?
- Objective E/Policy 3 – Is this not a goal for other communities on the island but only for `Ewa and Central O`ahu? (You talk about maintaining not establishing...maintenance not required elsewhere?)
- Policy 5 – Talks about giving people the choice to continue to live in the community that they were raised in? How will you do this since it means potentially increasing the population of that community (more kids, grandkids, etc?) How do you keep expanding the population to meet this statement and when does it “break” the system? I understand the desire of many people to have their kids live and work in the same community they grew up in but with large family sizes. especially in some communities, this may be unreasonable.
- Objective F/Policy 1 – This has not been done even though there are these types of visions for various communities that have been in existence for years. Is this primarily for the newer developments to establish “communities” in these new developments?
- Policy 3 – How committed is the City to this? There are instances where this has not been followed because the City Council or Administration believes they know what is best for a specific community without even living there or knowing the specific situation.

**Public Safety and Community Resilience (page 45)**
- Objective B – Nowhere is there any discussion regarding communication to the residents or visitors regarding natural disasters or other emergencies. There should be some acknowledgement that this needs to be managed not just on a State level but a City level.

**Health and Education (pages 47-48)**
- Objective A – Nowhere in this section is there mention of providing better services than ambulances from remote areas of the island. In the past, there was an agreement with DOD to provide air helicopter service for severe emergencies where ambulances where marginal in being able to transport individual(s) to better medical care, quicker. This should be explored and considered again.
- Objective B/Policy 3 – While commendable this is not something the City controls...should it even be in here unless the City is going to work with the State to make something like this happen, without additional cost, for the community?
Culture and Recreation (pages 49-50)

- Objective B/Policy 5 – Currently, the City has a funding source via the Clean Water and Natural Lands Fund. Should this policy recognize that the “public” is already participating?
- Objective D – Again, how much is enough? As more of the recreational “facilities” are opened up (I am mostly concerned with our natural resources), how do we protect and balance access while continuing to protect that area beyond the short-term dollar?

(page 51)

- Objective D/Policy 11 – Again, schools are under State control...what does the City think it can do to increase use of public school facilities for recreation, without charge to the community?

Government Operations and Fiscal Management (page 53)

- In general, I would encourage a statement regarding better, more open communication of policies, plan modifications, information regarding transparency in government operations before plans are implemented within a community so the community is not caught blind-sided by City operations/plans.
I agree with the proposed policy 10 to allow for short term vacation rentals in neighborhoods.

Allison Shadday
Kailua HI 96734
To: gp2035@hhf.com

From: Ben Shafer

Hauula, Hawaii 96717

RE: 2017 O‘ahu General Plan 2010-2035

Aloha mai kakou,

After reviewing Ka‘āawa Community Associations statement, I will also add my name.

I oppose changing the focus of the General Plan from directed growth areas of Honolulu to all of O‘ahu. Tax monies for infrastructure have gone to Ewa/Second City for many years now and all Ko‘olauloa Community Associations,(except Laie), the Kahalu‘u, Kailua, North Shore, Manoa, Millani/Waipio/Melemanu and Makakilo/Kapolei Honokai Hale Neighborhood Boards, have made Resolutions against developing a ‘Third City’ in Ko‘olauloa.

The O‘ahu Metropolitan Planning Organization’s (OMPO) Oahu Regional Transportation Plan 2040 (ORTP) has only long range projects slated from Haleiwa to Kahalu‘u in the 2029-2040 time frame. Temporary emergency fixes to Kamehameha Highway Route 83, that sole single access road, are being overwhelmed by rapid high wave erosion. Sea level rise is to only make these conditions worse and is being adjusted upwards currently per SOEST and/or NOAA (Chip Fletcher of UH’s study).

The Department of Emergency Management has advised area residents to have 30 days food and water supply for natural disaster preparedness. The DEM estimates 5.2 to 6.2 hours to evacuate the area. The tsunami from the Aleutian Islands in Alaska (potentially Extreme Tsunami besides) will get here in 4 hours. This road carries about 3.5 million tourists annually now in addition to portions of the de facto resident population of 1,029,798. 1% population growth goal in Ko‘olauloa is nearly 11,000 people; plus there is a partial DPP count of 4,356 already zoned urban vacant lots under 20 degree slopes mostly privately owned towards infill of nearly 22,000 population increase. The 2010 census was 16,732 and traffic is already fully saturated much of the time per OMPO. This is also the furthest vehicle miles traveled area from the Primary Urban Core jobs, etc. Responsible and sustainable Planning should not include this ‘more people, more problems’ situation. There has been only deferral and deletion of most work on this highway corridor so far.

I oppose detaching TOD from the Honolulu rail corridor and allowing TOD in every community, especially Ko‘olauloa.

I oppose the promotion of higher density and mixed use development as a policy for all areas regardless if the community is rural and not in the Sustainable Communities Plan.

I recommend that Housing and Communities Page 10, #20 be deleted. It implies that Transit oriented developments are desired and appropriate for all communities on O‘ahu. The bus stops are our only transit’ stations in Ko‘olauloa. Island-wide there are 3,837 bus stops. Route 83 has few places appropriate for TOD, and definitely increased density is not desired in remaining rural areas.

I oppose all changes to the Urban Growth Boundaries at Malaekahana Ahupua‘a in Ko‘olauloa in particular, and in this Plan generally. The Development Plans and SCP’s defined those for stakeholders already island-wide. Directed growth to the PUC and Ewa area is all that we support within 2035 time frame.

There are 4,356 partial DPP count of privately owned lots/lands in Ko‘olauloa will provide the Plan’s “organic fashion” for generations to remain in their home towns: adding “where infrastructure is existing and not before” where feasible in reference to Physical Development and Urban Design section p.11.

I support a carrying capacity study for O‘ahu population. Population Objective A, policy 2. Since none exists and sea level rise is threatening much low lying housing, shoreline setbacks need to increase for
all new construction so that population potential is also adjusted, growth discouraged, and thereby safety is emphasized regarding the people who live here.

I support that the words ‘to prevent urban sprawl’ be added after the word boundaries = “Development is contained within the growth boundaries: to prevent urban sprawl” in Population, Policy 3.

I oppose designating all of Laie a Resort area. This was a 49 unit motel designation nodule area zoned Resort that would now allow large scale development in Laie. There are already 725 visitor units to be allowed at Turtle Bay Resort with an additional daytime population add of 4,400 per their SEIS. That is an estimated 12 year build out on our 2 lane road that is eroding into the sea now. It is being a one lane road frequently as it is now due to emergency and scheduled bridge repairs, etc. Delete from the Economy, policy 10 please. All resort development additional populations do not count in the OGP’s 1 or 1.4% growth for Ko‘olauloa. Only what is considered permanent residential housing is counted.

I oppose allowing short term vacation rentals in residential zoned non-resort areas. There is possibly ‘demand’ for these, but in Ko‘olauloa 69% of all rentals are these illegal unpermitted transient vacation units already. (Our former State House Rep a year ago = this source).

That did not include the nearly thousand students of BYUH that are in rentals. More than 5 unrelated people in housing is also illegal, with 10 being common in Laie area. This mainly has contributed to a lack of lower cost rentals. Of the 4500 Air B & B units on Oahu, 2500 are owned by 500 people or companies (Air B & B included). There are many more TVU rental sources than them. The DPP has not shown the ability to enforce the rules on offenders, only 7 citations in District 23 which has over 1100 known TVUs’. More of them is not desirable whether visitors want them or not is our position. The as yet not passed Ko‘olauloa Loa Sustainable Communities Plan has BYUH doubling its student body (plus staff), if allowed, this should be on-campus housing only (100 acre campus).

I recommend language supporting farms and farming along the windward, North Shore, Waianae coast that was in the original OGP. We support the protection of all farms from urbanization, not just IAL designated land.

I recommend deleting Policy 12 of Housing and Communities Objective A. Preventing residential development outside the PUC and Second City areas should remain/ become the over-riding policy.

I recommend that Energy Objective A section, policy 6 eliminate d. geothermal energy from being considered in all areas on O‘ahu – the hotspot areas of O‘ahu at Kailua, Kaneohe, and Waianae are not good places for the fracking methods for this type of energy. No place on O‘ahu is as long as that is the method.

I support Deletion of Physical Development and Urban Design Objective E, #320, Policy 6 (page 54) in its entirety. No growth boundary adjustments are desired, not large or modest ones; nor changes to Land Use Ordinances that would allow them. The same Deletion is recommended for #319/Policy 5 (page 53). It is NOT sustainable development to take everything and develop it for this generation’s wants. We must consider future generations needs and the removal or use of resources this much development already is having on O‘ahu. Affordable housing and all infrastructures is in Ewa by design of directed growth. It may very likely NOT be in the community we were raised in on O‘ahu. People need to plan for this reality.

I support changing Cultural and Recreation Objective A, Policy 1 ‘encourage the recognition’ with: “Recognize” the Native Hawai‘ian host culture, including its customs, language, history and close connection to the natural environment as a dynamic, living culture and as an integral part of Oahu’s way of life. The Association of all the Hawaiian Civic Clubs supported no development of a ‘Third City’ in Ko‘olauloa by Resolution also. The OGP needs language to support the Hawai‘ian sustainable planning to the 7th generation … of having a beautiful natural rural, agricultural (and scenic open space) is an integral part of this culture.

Mahalo for any changes made to accommodate our ideas on the O‘ahu General Plan.

Respectfully submitted,

Ben Shafer
Dear HHF,

I am opposed to the General Plan draft language of Economic policy 10 and request it be removed.

"Economic Policy 10: Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively."

As written, this policy implies visitor lodging could be allowed in "non-resort" parcels such residential, agriculture and conservation land.

Economic Policy 10 would clearly contradict other policies in the General Plan that are designed to protect residential, agriculture and conservation zoning and their respective purposes.

Our current general plan was intently designed to control tourism sprawl, but Economic Policy 10 throws controlling tourism sprawl out the window. It's dangerous and a slippery slope to start introducing visitor lodging into every part of the island. Especially, at a time when Oahu is facing a housing shortage of over 25,000 homes in the next 10 years. I am very concern this policy could increase our severe housing shortage even more by converting homes and long-term rentals into mini-hotels! We need to decide what our priorities are; Providing housing opportunities for local residents or increasing tourism to unsustainable levels?

Please remove Economic Policy 10.

Sincerely yours

Stu Simmons
Oahu
The current enforcement of the rules has been ineffective to date. It makes no sense to allow a revisement that implies effective enforcement will take place. I suggest the DPP should be given greater powers to enforce the current laws now. See if they can reign in the thousands of illegal renters now, and then we can discuss changes.

Policy 10: Enforce the current ban on short term rentals and illegal B&Bs for a prolonged period of time to determine its potential benefit on the current house shortage. Confirm a robust enforcement mechanism is in place. Consider changes later on.

Regards.

Paul Spriggs
I am writing to voice my support of the Oahu General Plan with regards to permitting certain types of vacation rentals in residential areas such as Kailua and the North Shore.

As you know, we already have many non-permitted vacation rentals in these neighborhoods but what is important to understand is that there is a great need for this type of accommodation in these areas as seen by the demand. I understand that some of these short term rentals are causing problems for neighbors and those rentals should be dealt with by using the laws already in place. I would also like to point out that there is a huge difference between rentals where the owner is living on the property and provides on-site parking and rentals where the entire house is rented out and the owners and managers live off-site or on the mainland. The latter is where problems arise. Neighbors are unable to contact the owners or have a face-to-face meeting with them regarding the issues. These types of situations give every short term rental a bad name.

Please understand there are several families who are able to own a home in Kailua and pay their mortgage because they are able to rent out a room in their house to a tourist who does not wish to stay in Waikiki, or to a traveling nurse or military person or to a couple who has come to visit their children who live in Kailua. So, please understand the differences in the types of vacation rentals and permit those who are doing it right and paying their fair share of taxes. Do not give into hotel industry lobbyists or the vocal minority who are against every type of vacation rental. Your job is to find balance, to be fair and to understand that there is a huge demand that cannot be met by the hotels.

Make it legal to operate a vacation rental with restrictions such as:
- owner or manager needs to live on the property.
- owner needs to provide on-site parking for guest vehicles.
- no more than two rooms in the house can be rented out.
- taxes will be collected by airbnb or some other third party (no under the table cash deals).
- owners need to renew their license every other year or something similar.

In other words, there are ways to make this work for all concerned, including the City.

I'm not sure if this is the right place to voice this, but I was appalled to hear that Council Member Ron Menor wants to allow neighbors to file civil suits against their neighbors who operate vacation rentals. This is a terrible idea as there is already so much anger and division on some streets. Neighbors can and should call the police if there is a problem. They can and should also report to DPP any neighbor that is causing them distress. But throwing in the option to file lawsuits is a copout and it shows cowardice and a very hands-off approach by the City. Please do not follow through with this terrible idea.

Thank you for your time.

Sincerely, Shiyana Thenabadu
Kailua resident and community volunteer
I oppose the new “Economic Policy 10” as now written. We need to keep our neighborhoods commercial free. No “small-scale community-oriented visitor accommodations in non-resort areas.” The current laws which ban vacation rentals and bed & breakfasts in residential neighborhoods need to be enforced in a more timely manner than currently is done.

Please help us keep our neighborhoods as commercial free neighborhoods.

Thank you.

Sincerely,
Claudia L. Webster
Kailua, HI 96734
Please make sure the General Plan tightens up the language on vacation rentals and adds "teeth" to the enforcement. Neighbors are the best first line of defense and they should be able to instigate enforcement. Penalties should be very stiff. Vacation rentals do not belong in residential neighborhoods as they negatively impact the residents.

I also support the newer hotels in Laie and Kapolei--they fill an important need and should be considered in other communities. They should be in commercially zoned areas so as to minimize the impact on neighborhoods.

Mahalo for your consideration,

Derek Whetten
Laie, HI  96762
From: Ronaelee
Sent: Sunday, May 07, 2017 6:01 PM
To: info@honoluludpp.org; General Plan 2035
Subject: OPPOSE ECONOMIC POLICY 10

"Economic Policy 10: Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively."

**NO NO NO**

Oahu has thousands of illegal short-term rentals which have not been investigated and not stopped. Please do not propose added accommodations when we cannot enforce existing codes and regulations. Let the hotel industry take care of the market demand. This is our community input - stop the intrusion of vacation renters in our residential, family neighborhoods.

Thank you.

Hank and Ronaele Whittington

Kailua, HI 96734
From: Joe Wilson  
Sent: Monday, May 08, 2017 10:10 AM  
To: General Plan 2035  
Subject: COMMENTS: SECOND PUBLIC REVIEW DRAFT O'AHU GENERAL PLAN

I am writing to submit comment about the Second Public Review Draft of the O'ahu General Plan dated February 2017.

While I am comfortable with many of the updates regarding the focus on resource stewardship, affordable housing, urban design, sustainable energy, health and education, culture and recreation, I have serious concerns about any attempts to use this update as a way to extend the Urban Growth Boundary beyond that established in the 1992 General Plan or to allow for the rezoning or repurposing of existing agricultural lands.

I have particular concerns about this update's adjustment to the Distribution of Residential Population on the North Shore - from 1.7% to 2% - where the infrastructure is already at the breaking point and seriously overburdened by the ever-increasing flow of visitor traffic and commercial activity.

Similarly, I am strongly opposed to any attempts to facilitate further development of secondary resort areas at Turtle Bay Resort or in Lāʻie. Rather, we need to strengthen the emphasis of the preservation of existing agricultural lands and preservation of rural spaces and character, with a focus on the need for affordable housing for local residents.

Therefore, it is essential that Policy 5 (on Page 28 in section II: The Economy) is NOT removed. It states: "Maintain agricultural land along the Windward, North Shore, and Wai'anae coasts for truck farming, flower growing, aquaculture, livestock production, and other types of diversified agriculture."

Any attempts to reduce, rezone or repurpose existing agricultural lands will be met with strong opposition.

Joe Wilson  
Haleiwa, HI
Oahu General Plan 2017, 2nd DRAFT
Recommendations

Comments to:
HHF Planners
733 Bishop Street, Suite 2590
Honolulu 96813
gp2035@hhf.com

From: Linda Wong: Diamond Head
Note: These comments were prepared by a Permitted Interactive Group (PIG) by the Diamond Head Neighborhood Board 5 and failed to pass recommendation due to not being in a "Resolution" form by a vote of 6 'yea', 6 'abstain' and 0 'nay' votes.

The General Plan consists of general statements, objectives and policies for each of 11 sections: population; economic activity; Natural Environment; Housing; Transportation and Utilities; Energy; Physical Development and Urban Design; Public Safety; Health and Education; Culture and Recreation; Government Operations and Fiscal Management.

Major changes proposed for the first time in the General Plan

- 1) Transit-oriented-development (TOD) is proposed in several sections which means that TOD will not have to be connected to a rail line or rail station but can be developed around any bus stop, which is considered a transit station.
- TOD is defined as a mixed-use residential and commercial area designed to maximize access to public transport. A typical TOD neighborhood has a center with a transit station or stop (train station, metro station or bus stop) surrounded by relatively high-density development with progressively lower-density development spreading outward from the center.

  TODs generally are located within a radius of ¼ to ½ mile from a transit stop.

- opposes detaching TODs from the Honolulu rail corridor and allowing TOD in every community throughout the island with a bus stop.

- Opposition to the promotion of higher density and mixed-use development as a policy for all areas regardless if the community is rural or suburban and not in the district Development/Sustainable Communities Plans.

  p. 2

- 2) Short-Term Vacation Rentals
• Opposition to allowing short-term vacation rentals in residential/apartment zoned non-resort areas.

VII. PHYSICAL DEVELOPMENT AND URBAN DESIGN

• Opposition to Policy 6 which advocates transit-oriented-development around bus stops, which are considered transit stations throughout the island. Neighborhood Board 5 opposes facilitating transient-oriented development in transit station areas to create live/work/play multi-modal communities that (supposedly) reduce travel and traffic congestion which are in residential areas.

THE ECONOMY

• Opposition to Objective B; Policy 10, pg. 27.
• Permit small-scale community-oriented visitor accommodations (short-term vacation rentals) in non resort areas as warranted by market demand, community input and the ability to enforce effectively.

TRANSPORTATION AND UTILITIES

• Recommends omitting the word Evaluate and replacing it with Developing a strategy to prepare for… in Policy 5. This change acknowledges the General Plan's recognition of climate change and is an objective that can and must be met.
• Policy 5 – Develop a strategy to prepare for impacts of sea level rise on existing public infrastructure, especially sewage treatment plants, roads, and other public and private utilities located along or near Oahu’s coastal areas.
Aloha. As a tax-paying citizen who values individual freedom and the free market, I support a variety of legal, regulated visitor accommodations as stated in your proposed policy:

_Economic Policy 10: Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively._

The hotel lobby wants to keep island residents as low-paid workers for their profit. Hawaii relies on tourism and many visitors do not like staying in hotels and are looking for more authentic experiences outside of tourist zones. If we ignore this demand, we will lose out as a state.

Mahalo!
Nerissa Wong-VanHaren,
Kailua resident
Aloha,

I am a renter in Kailua, and I object to the Policy 10 attempt to open the door to ILLEGAL BnBs. I believe that enforcement of Illegal BnBs should occur. My entire street (Kuualia, Kailua) is illegal BnBs (most of them separate structures, landlords off-island, & properties removed from the long-term rental inventory). Result: impossible to find rentals here.

I live here, and I vote in all elections!

Best,

Susan J. Wurtzburg

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Susan J. Wurtzburg, Ph.D.
* * *
Owner/Editor, Sandy Dog Books LLC (editing books & articles)
Kailua, Hawaii
"Let me live, love, and say it well in good sentences" (Sylvia Plath).
To Whom It May Concern:

I am absolutely opposed to the following change to the O'ahu General Plan regarding permits for additional visitor accommodations in non-resort areas.

"Economic Policy 10: Permit small-scale community-oriented visitor accommodations in non-resort areas as warranted by market demand, community input and the ability to enforce effectively."

In fact, the City must effectively enforce the exiting ban on vacation rentals and shut down the thousands of illegal rentals already operating in our neighborhoods. Vacation rentals destabilize our neighborhoods and drive up the cost of housing for O'ahu's residents. The citizens of O'ahu cannot afford to allow vacation rentals in residential neighborhoods.

Policy 10 should be restated as follows:

"Policy 10: Effectively enforce the current ban on vacation rentals and bed & breakfasts in residential neighborhoods to encourage stability in our neighborhoods and bring down the cost of housing for O'ahu's residents.

Thank you for considering my comments.

Theresa Yamanoha

Waialua, HI