

Testimony before the Planning Commission
Re the June 13 Draft General Plan
by Councilmember JoAnn A. Yukimura
June 13, 2017

Chair Keawe and Members of the Planning Commission:

Thank you for this opportunity to testify.

Thank you for the way in which you have been exercising your responsibility as Planning Commissioners to carefully review the Draft General Plan and ensure that it fulfills its mission as defined by county law, Chapter 7 of the Kauai County Code (KCC). Sections 7-1.2(b) of the Code reminds us that

"The General Plan states the County's vision for Kaua'i and establishes strategies for achieving that vision. The strategies are expressed in terms of policies and implementing actions. . . ."

I know it must be tempting to just approve the document and send it on. It's already taken so much hard work and there's so much to think about, but the General Plan is the most important planning document you will vote on during your tenure as a planning commissioner. Just as it is difficult, if not impossible, to build a sturdy well-functioning home without a good plan, it is even more difficult to build a beautiful and unique, sustainable, healthy and equitable island community--the vision for Kauai to which we all aspire--without a thoughtful, well-written, clear and integrated General Plan.

Before you vote to approve the current Draft General Plan ("Draft Plan"), please assure yourselves that the Draft Plan states solid, clear, and consistent policies and implementing actions and that the various sectors (e.g. transportation, growth management, housing) are integrated, not by icons, but by policy statements that provide clear guidance for Kaua'i over the next 20 years.

As I see it, there are still two major flaws with the Draft Plan before you today. 1) While by law the General Plan is basically a policy document, the policy statements in Section 1.4 Policies to Guide Growth are incomplete and inconsistent and do not give clear policy direction. There are also disjointed policy statements scattered throughout other sections of the Draft Plan and a lack of connection between policy and implementing actions. 2) There are major disconnects between policy statements and proposed land use map changes and a lack of critical information about proposed map changes.

1. Inadequate Policy Statements

To provide a couple of examples, the **Draft Plan Transportation Policy** statement 1.4.7 (p. 1-22) fails to focus on the main features of the Multimodal Land Transportation Plan (MLTP), omitting mention of mode shift, transit expansion and wise land use as key ways to manage congestion. In using the words "strategic infrastructure improvements," without further clarification, the Transportation policy wording harkens to road widening and bypasses, which alone are not real solutions (witness: Honolulu); nor will such a policy protect the rural character of Kaua'i, which is one of the main goals of the General Plan.

The draft transportation policy statement fails to state clearly the main challenge and goal in land transportation: to transform a car-based system to a multimodal system and how to get there. The action section is stated in the framework of silos (roads, bikeways, transit, etc.) without showing the system goals and correlating action strategies that will build the new land transportation system of the future. It also fails to show the interconnections between a multimodal land transportation system and achieving other goals in the Draft Plan: improved mobility, support for economic development and jobs, improved public health, lower cost of living, and reduced greenhouse gases and fossil fuel consumption, all of which provides powerful validation for a multimodal system.

The **Draft Plan Housing Policy Statement** 1.4.2 (p. 1-20) is also inadequate. The text speaks only of the problem and says nothing of a policy to solve the problem. The subheading suggests some solutions, but they are not convincing: "Increase the amount of housing available by focusing infrastructure improvements in growth areas." While focusing infrastructure improvements in growth areas is part of the solution and will remove one barrier to housing development, it is not clear how, with a worldwide market for lucrative investment opportunities and many people from Oahu and the mainland wanting to move to Kaua'i, simply increasing supply is going to provide housing for local families in the long term, especially when the median price of a home is \$600,000+ and 80% of the 1400 units are needed by families at or below 100% of median income which is about \$80,000 for a family of four.

Given that the average cost of building a housing unit on Kaua'i is \$450,000, what will be needed is very deep subsidies. There is no discussion on how that is to be provided. Nor is there any discussion about the need for a policy of perpetual affordability. Present county policy allows units provided with taxpayer subsidy to be sold in the open market after between 10-30 years, which limits the "return" (number of affordable housing years) that taxpayers get on money invested in affordable housing and gives a windfall to certain qualified families at the expense of other qualified families.

Oddly, Section 2.1 Future Land Use Objectives includes a housing objective that is being used as a basis for future land use designations but is mentioned nowhere in the Draft Plan Housing Policy statement. The objective is: "To meet future housing needs through "missing middle" housing types that are affordable by design and located near jobs centers." This policy

statement on page 2-1 is entirely absent from the Housing Policy statement on p. 1-20. Neither is there any discussion of what "affordable by design" means, nor how, amidst strong market pressures an "affordable by design" unit will remain affordable when, as we know, in times of high market activity on Kaua'i, shacks are rented for exorbitant prices. Neither is there an explanation about how "the missing middle" is the most urgent housing priority for the County. There is no definition of "the missing middle" nor is there data presented to show that the "missing middle" represents the most urgent housing priority for our county. Nor is there discussion about how to provide housing for the bottom group that makes up 80% of the housing need: the families with 100% of median income and below. A coherent housing policy is clearly missing from the Draft Plan.

Suggested Remedy

It is evident that the existing cycle of new drafts, public comments, Planning Commission considerations and amendments every three weeks or so may not be the most efficient or effective way of achieving a coherent and integrated General Plan draft that is ready to be sent to the Council. As I have suggested before, it would be useful to take one subject at a time, to have a format that allows extensive but contained dialogue among the major stakeholders (Planning Commissioners, Planning staff, and citizens) and to have the help of a neutral and trained facilitator to establish a common understanding of the problem and a consensus as to the policies and implementing actions that will best address the problem. It would be the job of the facilitator to then reconcile the wording for the Draft Plan, subject to approval by the Planning Commission.

I don't think it will be necessary to do this to the whole plan, just to key sections of the Draft Plan, say, housing, transportation, growth management as examples. In fact, it would be best to just try one section without committing to anything more and see whether it gets you to a more satisfactory outcome.

2. Disconnect between Policy and Proposed Land Use Map Changes

My comments here are focused on land use changes proposed for the Eleele-Hanapepe community because I have not been able to study all the proposed changes in the Plan Draft and because concerns have been expressed by residents in the Eleele-Hanapepe communities. However, I believe my concerns could be generalized to all proposed changes.

If the special Westside character and lifestyle is to be sustained, even as the West Side grows, expanding residential and commercial areas on the West Side needs to be done with great care. The Draft Plan text adopts for the West Side "incremental" as compared to "transformational" growth, with the latter term referring to large, high-impact growth that could dramatically change the character of a place over time. "Incremental" growth makes sense for the West Side; however, it appears that the proposed map changes are actually transformational. But it is

difficult to determine the impacts when the only information provided is a colored space on a map.

What can be discerned is that the area proposed for Neighborhood General has expanded considerably between the first Draft Plan presented in November, 2016, and the June 13 Draft Plan based primarily on a landowner request with no clear public interest justification. In that time frame, too, the "Provisional Agriculture" designation has popped up and appears to at least double the Lima Ola area, which suggests that with Lima Ola lands, a total of 150 acres of Kaua'i Coffee lands are slated potentially for urbanization. One must ask how is this consistent with our policy to protect and perpetuate agriculture?

All of this is being proposed in an area that is allocated 4% growth. (see p. 1-4, Fig.1-4, Draft Plan) A 4% growth allocation to Hanapepe-Eleele applied to 9,000 needed units islandwide, means that 360 housing units will be needed in the Hanapepe-Eleele district over the next 20 years. Lima Ola's 550 units plus Habitat's 125 units together will provide 675 units, almost double the 20-year allocation for Hanapepe-Eleele. Adding what appears to be more acreage for housing on the Hanapepe Heights side of the district, plus another 75 acres for potential housing on "provisional agricultural land" seems completely unreasonable and is dramatically inconsistent with Draft Plan policies.

A similar analysis needs to be made of the proposed Neighborhood General to the east of Port Allen, but not enough information is available. We need to know how many acres are being proposed for that designation, what housing and commercial uses are projected for those acres, what lands are already zoned for such uses in the Hanapepe-Eleele area, what the existing uses are and their importance to the community and the island, and what alternative expansion sites exist in the area and how they compare in terms of suitability for that designation and how each site aligns with the Draft Plan policies.

Suggested Remedy

1. Remove the "Provisional Agriculture" designation proposed for coffee lands east of the Lima Ola site.
2. Remove the Neighborhood General Designation to the east of Port Allen, subject to updating the Hanapepe-Eleele Community Plan which would provide the proper analysis and community input required for such a change. In the alternative, request specific information from the Planning Department that will enable you to better assess the proposal. You can also ask the Planning Department to do the kind of analysis they do when similar general plan amendments are proposed by application. That might, of course, require an Environmental Assessment.
3. Defer final decision-making on the Draft Plan and ask the Planning Department to provide you with analysis and justification for all the land use changes proposed in the Draft Plan.

Thank you for not allowing yourselves to be rushed into approving something, the implications and ramifications of which you do not understand. Please do not hesitate to ask questions--of citizens as well as the Planning staff--if you feel things are not clear. Remember that the planning staff of the City and County of Honolulu, which is presently updating its General Plan, has laid out a 6-year time frame for their General Plan Update process. Taking the time to understand and make sure the Kauai Draft Plan is in good shape, even if it delays your approval for 2 or 6 months more, is not unreasonable.

With respect and appreciation,

JoAnn Yukimura
Councilmember
Planning Committee Vice Chair
Public Safety and Transportation Committee Chair