



September 3, 2024

Honorable Mitchell Roth, Mayor, County of Hawai'i  
Honorable Heather Kimball, Chair, Hawai'i County Council  
Mr. Zendo Kern, Director, Hawai'i County Planning Department

*Coming soon...  
to a park near you!*

Dear Mayor Roth, Chair Kimball and Director Kern:

Thank you for the County's effort in finalizing the Hawai'i County General Plan 2045 (GP 2045). The refinements, expansions and modernizations in the proposed goals, objectives and actions relative to the 2005 Plan set a good course for managing the actions of our County to improve the life of its citizens and protect what is important to us.

Hilo Bayfront Trails, Inc.  
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The Board of Hilo Bayfront Trails, Inc., appreciated the opportunity to comment on the draft GP 2045. Our non-profit is now 12 years old, and we meet nearly every month to advance the Trail and extensions of it. We are pleased that over half of the ambitious Trail project has already been built, and we look forward to assisting the County on the remainder. As you know, we have expanded our mission beyond completing the Trail to advancing the utility and safety of pedestrian and bicycle facilities throughout East Hawai'i, in keeping with Complete Streets, Vision Zero and Smart Growth principles. We know from talking with each of you as well as the projects this administration advances that you share our basic goals.

We also know you would agree that there is ample room for improvement. We have very little in the way of urban multimodal trails. Most of our County's streets lack bike lanes and many lack even sidewalks. Our streets are unappealing and hazardous to bike or walk. There are also very few safe pedestrian or bicycle facilities connecting our scattered communities. The vicious circle of no facilities ⇔ no walking/biking contributes to Hawai'i's epidemic of obesity, poor cardiovascular health and diabetes, along with isolation of the large proportion of the population that does not drive. The national surge in speeding and aggressive driving during the pandemic has not abated, and drivers in Hawai'i are killing or injuring pedestrians and bicyclists at alarming rates. While we cannot control the attitudes of individual drivers, through thoughtful design we can greatly influence their behavior. It has been demonstrated throughout the world that funneling cars is not the primary way that city streets contribute value to a community. Instead, the great social and economic wealth of our streets is because they host homes, foster businesses, and support people on the ground walking and biking, accessing parks and services, shopping and patronizing restaurants. If town streets are designed like highways, with the goal of moving cars as fast as possible, i.e., if they have wide lanes, uniform profiles, large turn radii, timed signals, no street trees, no curb extensions, and

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inadequate or missing sidewalks and bike lanes, they become the hazardous, unappealing hybrid called a “stroad”. These detract from the wealth of our streets and by extension, our towns. We need to avoid the bad design that leads to stroads and to convert existing ones to safe, vibrant streets that protect our citizens and promote real community value.

Back to the General Plan. Upon review, we see that many of our suggestions were taken, and some were not. We appreciate the wording that you added in various places at our suggestion to move the Plan towards better accomplishing multi-modal goals. Rather than detail each section where we feel the Plan could have further advanced these goals, we would like to discuss the implementation actions in Section 6.4.4. After all, these are the most important part of the plan. We are intimately familiar with the fate of most government plans, which sit on the shelf or are very unevenly implemented. We urge the County to emphasize implementation of the following, **AND WE WOULD LIKE TO HELP**:

*16a. Develop a comprehensive, island-wide multimodal transportation plan that identifies the location and operation of automobile, mass transit, bicycle, and pedestrian systems, in coordination with appropriate federal and state agencies.*

This is a critical element of any future transportation planning. It will be crucial to incorporate and build on the **Downtown Hilo Multimodal Master Plan** as part of this effort.

*16c. Amend the County Code, Chapters 22, 23, and 24 to increase active transportation and accommodate emerging micro-mobility solution.*

Micromobility devices such as E-bikes, E-scooters, E-skateboards, etc. are rapidly increasing on the Big Island, as they are throughout the country. It will be good to get ahead of regulatorily accommodating this generally positive trend.

*17.a Develop and adopt a program to establish public access to historic and modern active living corridors and facilities that provide an island-wide route and connect to major destinations.*

We strongly support this for residents and as part of sustainable tourism.

*17.b Explore the potential of multimodal trails to serve as evacuation routes during emergencies.*

We are pleased that the GP 2045 was amended to incorporate this measures, as suggested by our partner Saman Dias of the Maui Bicycling League in her comment letter. It is unfortunate that long-planned multi-modal infrastructure was not yet ready during the August 2023 fire in Lahaina. The Maui wildfires have much to teach us, including how multi-modal trails can contribute to safety and resilience to disasters. These lessons are readily applicable to communities such as Waikoloa,

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Hāmākua and Lower Puna. (Please see <https://www.westmauigreenway.org/wmg-call-to-action.html>)

*19.a Continue to adopt the County Street design manual as the County's complete street design program/policy.*

We will be reminding our County's administration and council to adopt this so that consideration of complete streets is mandated prior to the design of County new road and road rehabilitation projects.

*19.c Develop an active transportation plan to guide where complete street improvements should be focused and replace previous pedestrian and bikeway plans.*

We support this and also wonder how it dovetails with Item 16a.

*19.d Identify all roles for interdepartmental collaboration in delivering a truly multimodal transportation system.*

Breaking down the silos is extremely important for implementing the GP 2045. It is very easy to forget this on a daily basis and we hope you incorporate collaboration in all decisions. **Please include the public as partners when appropriate.**

*19.e Update traffic impact analysis requirements to include alternative evaluations to the level of service outcomes, such as vehicle miles traveled and alternative transportation metrics.*

We want to emphasize that the era of unquestioned priority of Level of Service (LOS) are truly over in progressive communities throughout the land, and it should be here as well. Moving cars as fast and efficiently as possible to achieve LOS A through Downtown Hilo is the exact opposite of what we need for safe, accessible and vibrant streets. Please require alternative evaluations in all TIARs reviewed by the Planning Department.

*19.f Increase community engagement and education around active transportation and alternative transportation options.*

The CIP process and every County substantial road project should adopt this as a mantra, at the very beginning.

*20.b Amend the County Code to promote connectivity and discourage neighborhoods with only one inlet or outlet.*

We strongly support this. Even where it may seem infeasible to provide additional vehicular access, pedestrian and bicycle access should be increased.

*20.c Establish a corridor planning/management program that is data-driven and uses performance-based targets and outcomes.*

We encourage this and want to see the data available to the public.

*20.e Adopt a Complete Streets ordinance.*

This is a critical requirement for complete streets to be advanced in the County in reality, rather than just proclamation.

*22.a Amend the County Code to incorporate Vision Zero safety principles and Complete Street design principles.*

We encourage this.

*35.c Partner with government, private and nonprofit agencies, and other stakeholders to increase funding sources for park, recreation, and trail development and maintenance.*

As a group that has authored four non-County grants along with private donations totaling more than \$2 million to help build Hilo Bayfront Trails, we pledge to continue assisting the County and we applaud the commitment to partnering.

*35.cc Expand active open recreational opportunities at the Pana'ewa Rainforest Zoo and Equestrian Center properties such as bike/walking trails, horse trails, dog-friendly trails, and other outdoor recreation that would complement the Pana'ewa complex.*

We support this.

One important implementation item that we believe is missing from the GP 2045 is a commitment to an Urban Development Plan (UDP) for Hilo. Why is this important? The town of Hilo is unique of all regions on the island in that it lacks a modern CDP (the last Hilo CDP dates from 1975). There is thus no mechanism to accomplish the intended functions of the CDP, which the GP 2045 says are to:

1. Translate the General Plan's broad statements and community development guidelines to actions specific to the planning area to address regional issues and opportunities.
2. Improve and advance communities and community resilience through the acknowledgment and development of community capacity.
3. Provide a process for citizens to engage in civic dialogue and contribute to the identification of community priorities.

Citizens in Hilo frequently feel left out of the planning and project review process because of the lack of an Action Committee to monitor implementation of the

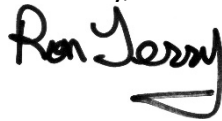
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General Plan. Again, we request that the County develop a Hilo UDP and that it be formulated to include an Action Committee. Just as with CDPs, nine volunteer residents from the Hilo area should serve as stewards of the UDP through facilitating implementation and recommending plan updates as needed.

Thank you for the opportunity to comment on the Final GP 2045. Perhaps it is not too late to make some adjustments to improve our urban trail infrastructure and make our streets safe, inclusive and more effective for all.

Sincerely,

A handwritten signature in black ink that reads "Ron Terry". The signature is written in a cursive, slightly slanted style. Below the name, there is a small, simple horizontal line that serves as a decorative flourish or underline.

Ron Terry, Secretary  
Hilo Bayfront Trails, Inc.

Cc: U.S. Representative Jill Tokuda; Amy Ford-Wagner, FHWA; Ed Sniffen and Laura Ka'akua, HDOT; DLNR Chair Dawn Chang and Na Ala Hele Advisory Council; State Representatives Chris Todd, Richard Onishi, Greggor Ilagan and David Tarnas; State Senator Lorraine Inouye and Joy San Buenaventura; Hawai'i County Councilmembers Jenn Kagiwada, Sue Lee Loy, Michelle Galimba and Ashley Kierkiewicz; County of Hawai'i Windward and Leeward Planning Commissions Hawaii Bicycling League; PATH; Hawai'i Island Chamber of Commerce; Japanese Chamber of Commerce and Industry of Hawai'i; Kona-Kohala Chamber of Commerce; Hawai'i Public Health Institute; Ulupono Initiative