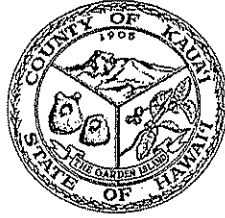


Bernard P. Carvalho, Jr.
Mayor



Michael A. Dahilig
Director of Planning

Gary K. Heu
Managing Director

Dee M. Crowell
Deputy Director of Planning

PLANNING DEPARTMENT
County of Kaua'i, State of Hawai'i

4444 Rice Street, Suite A-473, Līhu'e, Hawai'i 96766
TEL (808) 241-4050 FAX (808) 241-6699

Date: January 16, 2013

To: Dan Orodener, Executive Officer
Land Use Commission

From: Michael Dahilig, Director
County of Kaua'i Planning Department

A handwritten signature in black ink, appearing to read 'Michael Dahilig', written over the printed name in the 'From' field.

Subject: Docket No. DR12-48
Petition for Declaratory Order to Designate Important Agricultural Lands
Petition dated December 3, 2012 and Revision to Exhibit D-2 dated
January 9, 2013 (corrected proposed boundary).

Petitioner: Grove Farm Company, Incorporated

Location: Ha'upu, Kōloa, Kaua'i, Hawai'i

TMK: Portions of (4) 2-8-001:001 and (4) 2-8-002:001

Acreage: 11,026.2 acres of lands in the Agricultural Zone

The Planning Department, County of Kaua'i has reviewed and supports, in general, the Petition for designation of the subject lands as Important Agricultural Lands, pursuant to the requirements of Act 183, SLH 2005.

In 2009 the County of Kaua'i began its IAL Study project. The purpose of the project is to identify candidate lands that meet the criteria of the IAL legislation. The County contracted the University of Hawai'i Department of Urban and Regional Planning to conduct research, data gathering, analysis, and a community process to develop maps showing candidate lands. To date, the project results include updated data about Kaua'i's agricultural lands relating to the IAL criteria (such as lands currently in production, water availability, historic taro lands and unique crops, etc) as well as input from a seventeen-member Stakeholder and Technical Advisory Committee, experts in the field of agriculture and land use, and the community at large regarding the priority of importance of the eight criteria for Kaua'i (the availability of water being of the highest priority). Although the final results of this project and recommendations are not available at this time, the Planning Department is able to ascertain, through new maps and tools, how well parcels of land fit the criteria set forth in the legislation.

The maps provided in the Petition matches preliminary maps developed through the IAL Study process of lands meeting the criteria for IAL. Thus, the Planning Department supports the overall designation of these lands. It is unclear to the department, however, how the designation of Waita Reservoir (approximately 415 acres of TMK (4) 2-8-001:001) will affect use of the water by the surrounding properties.

The Planning Department is supportive of the continuance of ranching and grazing activities. However, recreational uses on IAL may need further evaluation.

The Planning Department would also like to acknowledge that the Petitioner has not concurrently petitioned to utilize the 85/15 reclassification incentive on page 9 of the docket.

Thank you for your consideration of our comments. The Department looks forward to working with the Petitioner in its development of a County IAL Program to consider incentives toward the goal of increasing food and primary resources self-sufficiency.

Should you have further questions for the department regarding this petition, please contact Lea Kaiaokamalie of my staff at 808-241-4061.