

**Bernard P. Carvalho, Jr.**  
Mayor



**Michael A. Dahilig**  
Director of Planning

**Wallace G. Rezentes, Jr.**  
Managing Director

**Ka'aina S. Hull**  
Deputy Director of Planning

**PLANNING DEPARTMENT**

**County of Kaua'i, State of Hawai'i**

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

Date: August 4, 2016

To: Dan Orodener, Executive Officer  
State of Hawai'i Land Use Commission

From: <sup>for</sup> Michael Dahilig, Director   
County of Kaua'i Planning Department

2016 AUG 10 A 8:49  
LAND USE COMMISSION  
STATE OF HAWAII

**Subject: Docket No. DR16-56**  
**Petition for Declaratory Order to Designation Important Agricultural Lands**  
Petition dated June 27, 2016

Petitioner: Robinson Family Partners

Locations: Portions of Makaweli, Kaua'i, Hawai'i

TMK and Acreage:

TMK	ACREAGE (APPROXIMATE)
(4) 1-7-001:001 (portion)	10,678.16
(4) 1-7-001:009	3.00
(4) 1-7-005:002 (portion)	2,816.47
(4) 1-7-005:009 (portion)	67.59
(4) 1-7-006:004 (portion)	1,733.96
(4) 1-7-006:005	192.48
(4) 1-7-006:006 (portion)	3,983.07
(4) 1-8-001:001 (portion)	1,413.11
<b>Total</b>	<b>20,887.84</b>

Pursuant to Hawaii Revised Statutes (HRS) §§205-41 through 205-44 and Article XI, Section 3 of the Hawaii Constitution, and having reviewed the available information and the Petitioner's representations, the County of Kaua'i Planning Department submits its comments in support of the Petition for designation of the subject lands as Important Agricultural Lands (IAL).

The petitioner declares intention to continue and expand current agricultural activities into the foreseeable future, including expansion of water infrastructure to an additional one-thousand (1,000) acres of field to support cattle ranching and seed corn production activities.

The maps provided in the Petition match preliminary maps developed through the County of Kaua'i IAL Study (August 2015) of lands and meets the criteria for IAL (HRS §205 Part III). The Kaua'i IAL Study provided for a "threshold" score of 28 as a guide for identifying candidate agricultural lands for a *County-led designation process*. However, pursuant to HRS §205-44, agricultural lands that meet *any of the eight criteria of IAL* will be given consideration provided that its designation meets the purposes of the State Constitution and objectives and policies provided in HRS §§205-42 and §205-43.

The Kaua'i IAL Study provides a discussion of the mapping analysis conducted by the University of Hawai'i to identify lands with the potential for increasing food and energy security on Kaua'i (see IAL Study pages 24 to 40). Although the subject lands do not rate highly for food crop production, it shows potential for the development of other crops, including but not limited to energy crops. In addition, the Kaua'i IAL Study discusses the Potential of Beef Production (page 39-40) and identifies subject lands as contributing to the largest portion of beef production in West Kaua'i. Pursuant to HRS §205-4.5, cattle ranching and seed corn production are permissible uses within the State Agricultural District.

Finally, the Planning Department acknowledges that the Petitioner has voluntarily waived any and all rights to assert, claim, or exercise the 85/15 reclassification incentive (page 16 of petition).

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 Staff Planner, Lea Kai'aokamālie at 808-241-4061.