

From: [DBEDT LUC](#)
To: [Quinones, Natasha A](#)
Cc: [Hakoda, Riley K](#); [Derrickson, Scott A](#)
Subject: FW: [EXTERNAL] testimony item III STVRs June 8
Date: Tuesday, June 7, 2022 8:01:13 AM

From: Cory <333cory@gmail.com>
Sent: Monday, June 6, 2022 7:31 PM
To: DBEDT LUC <dbedt.luc.web@hawaii.gov>
Subject: [EXTERNAL] testimony item III STVRs June 8

testimony on agenda item III Short-Term Vacation Rentals
for Hawai'i State Land Use Commission
9 AM Wednesday, June 8, 2022
from Cory Harden, Hilo, Hawai'i Island

Aloha Commissioners,
Thank you for your volunteer service.

Allowing short-term vacation rentals (STVRs) on agriculture land means doubling down on risk and unsustainability—with less local food, and more tourism.

When you open the door to STVRs, numbers seem to explode. At Kapoho Vacationland, before the lava flow wiped it out, there were vacation rentals in an estimated 4 out of every 5 houses. In 2019, close to half of the 4,000 STVR applications in Hawai'i County were for nonconforming use certificates, mostly for agriculture land. Hawai'i Island has over one million acres of agriculture land, so we could get huge numbers of STVRs.

STVRs have serious impacts

- less food self-sufficiency
- the huge carbon footprint of importing food and transporting tourists
- noise/ light pollution and traffic that disturb neighbors
- higher rents and property taxes for neighbors

It is unlikely the Legislature intended to have a loophole allowing STVRs in agriculture districts, by just calling them “farm dwellings.”

The primary use of agricultural land must be agriculture. The Hokuli'a project was shut down for three years because the court ruled that one-acre properties with agriculture activities in the easement or building envelope was not sufficient. Hokuli'a was supposed to go to the LUC to have its Ag designation changed to Rural, but never has, and so has been allowed by the County to develop and get variance for roads and other infrastructure under less restrictive rules and regulations than it should. Each Hawai'i County building permit applicant must sign a form that they are aware of the Kelly v Oceanside Partners ruling that requires homes to be farm dwellings.

Mahalo for your consideration.