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Statement of  
**MARY ALICE EVANS, Director**

before the  
**HOUSE COMMITTEE ON WATER AND LAND**

Tuesday, March 25, 2025

9:40 AM

State Capitol, Conference Room 411

in consideration of

**HR 59/HCR65**

**REQUESTING THE LAND USE COMMISSION TO COORDINATE WITH COUNTY  
PLANNING COMMISSIONS AND COUNTY COUNCILS TO CONDUCT  
CONCURRENT REVIEWS OF GENERAL PLAN AMENDMENTS, DISTRICT  
BOUNDARY AMENDMENTS, AND ZONING AMENDMENTS WHEN  
RECLASSIFYING LAND.**

Chair Hashem, Vice Chair Lamosao, and Members of the House Committee on Water and Land.

The Office of Planning and Sustainable Development (OPSD) appreciates the intent of the resolutions and offers **comments with concerns** on HCR 65 and HR 59, which ask the Land Use Commission (LUC) to coordinate with each county planning commission and county council to conduct concurrent reviews of general plan amendments, district boundary amendments, and zoning amendments by ensuring that each decision is made in the appropriate sequence but scheduled as close together as practicable. The LUC, county planning commissions, and county councils are also asked to develop administrative procedures or memoranda of understanding to facilitate shared hearings, joint public comment opportunities, and synchronized timeline to reduce unnecessary delay and duplication of effort.

OPSD supports the objective of the resolution to coordinate and streamline the LUC and county land use review processes. However, OPSD notes that coordinated alignment may not result in time or cost savings because key elements of LUC proceedings are prescribed by statute in Hawai'i Revised Statutes (HRS) Chapter 205. Unless submitted by a county planning department, OPSD also has concerns about a concurrent review of a district boundary amendment, plan amendment, and zone changes. A "spot" plan amendment is not subject to the complete review or meaningful public input afforded by the broad-based studies and community deliberation on future land use policy that is provided in a county's periodic comprehensive plan revision process. Ad hoc amendments reduce certainty and predictability for the county and

communities as to the character and timing of not only planned growth, but also public investments in infrastructure and services to support that growth.

For these reasons, OPSD suggests that the effort requested in the resolution would be more impactful if directed to a collaborative effort between State and county agencies to develop an alternative process to the LUC's quasi-judicial district boundary amendment process for regional district boundary amendments that align State district boundaries with the county plan land use designations in county general or development plans adopted pursuant to a periodic comprehensive plan revision process. This would be the most efficient means to streamline development, including housing production, in areas where the counties can and wish to support growth.

Thank you for the opportunity to testify on this resolution.



# LAND USE COMMISSION

*Komikina Ho'ohana 'Āina*

DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM

*Ka 'Oihana Ho'omōhala Pā'oihana, 'Imi Wai wai a Ho'omāka'ika'i*

JOSH GREEN, MD  
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Statement of  
**Daniel E. Orodener**  
**Executive Officer**  
State Land Use Commission

Before the  
**House Committee on Water and Land**

Tuesday March 25, 2025  
9:40 AM  
State Capitol, Room 411 and Video Conference

In consideration of  
**HCR65/HR59**

**REQUESTING THE LAND USE COMMISSION TO COORDINATE WITH COUNTY  
PLANNING COMMISSIONS AND COUNTY COUNCILS TO CONDUCT CONCURRENT  
REVIEWS OF GENERAL PLAN AMENDMENTS, DISTRICT BOUNDARY AMENDMENTS,  
AND ZONING AMENDMENTS WHEN RECLASSIFYING LAND**

Chair Hashem; Vice Chair Lamosao; and members of the House Committee on Water and Land:

The proposed resolution requests the Land Use Commission ("LUC") to work with county planning commissions and county councils to develop administrative protocols or memoranda of understanding that lead to better coordination and towards concurrent reviews of general plan amendments, district boundary amendments, and zoning amendments.

The LUC has and will continue to work closely with county agencies to consolidate timelines where possible while still preserving the integrity and thoroughness of each review.

Thank you for the opportunity to testify on this matter.