

Cain, Michael

From: David Kimo Frankel <davidkimofrankel@gmail.com>
Sent: Friday, June 7, 2024 8:17 AM
To: Cain, Michael; Smull, Kanani F
Cc: Elena Bryant; Wayne Tanaka
Subject: [EXTERNAL] conservation district rule amendments

Michael, Kanani et. al.

Your April 30, 2024 draft of amendments to the conservation district rules include some elegant changes. Your focus appears to be on beach issues, which I haven't spent a lot of time thinking about for years. But I have a few comments on other amendments:

13-5-2 "Management Plan" and Exhibit 4 should include a carrying capacity analysis (i.e., what are the maximum "land uses" that are compatible on the parcel—given that it is a long-term planning document) and a limit on cumulative impacts

13-5-21(b). Agency consultation recommended does not make sense. We discussed that.

13-5-22 P-12. Department approval of 49 kW projects is a pretty radical departure from the existing rules.

13-5-30(e). As I mentioned, I get nervous when some resources are specifically identified and others are left out. Your list is pretty good, but I think the following should be specifically mentioned:

- water quality (whether it be from soil erosion or something else)
- surfsites (before ~1975, a lot of choice surf sites were destroyed; there are too few left, and they are heavily used)
- dark skies (impact on certain birds and star-gazing)
- quiet (in an area free of man-made noises) if the area is accessible to the public

Exhibits. I think it makes it easier for everyone if the exhibits were simply given rule sections. 13-5-__. If they are part of the rules—and they are—calling them exhibits is odd.