

From: [Lana Albright](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] I oppose agenda item D8
Date: Thursday, December 12, 2024 11:15:25 PM

Aloha, I am writing in opposition of agenda item D8.

Our shorelines will naturally wear and we need to not impose and create further destruction of our coastline and reefs.

Mahalo for your time,

Lana Albright

Sent from my iPhone

From: [Davin Balagso](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the project
Date: Thursday, December 12, 2024 6:37:29 PM

Aloha Board of Land and Natural Resources,

My name is Davin Balagso and I am a fisherman and diver born and raised in Lahaina. My family relies on the healthy ecosystems of West Maui for subsistence, and the proposed Hololani rock revetment will further damage our coastline and restrict access to vital resources. I urge you to reject this project to protect the environment and preserve our cultural practices for future generations.

Mahalo,
Davin

[Sent from Yahoo Mail for iPhone](#)

From: [Natia Barber](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Opposition Item D8
Date: Friday, December 13, 2024 4:27:05 AM

Aloha,

My name is Natia Barber and I'm writing in opposition to item D8.

This project sets a very slippery and dangerous slope that would give private investors the power to destroy more of our public resources. How can we create community if we're relying on the interests of people who don't reside where they'd like to cause mass destruction.

We must protect our public beaches and not continue to put bandaids over issues that need real help. I understand the desire of these foreign investors to protect their investments, however it isn't coming without a price. That price is our precious beaches, our place we call home, our space in which we all come together.

If we allow this project to go through I implore you to think of the foot that will be put in the floodgates to future harmful developments. It's not too late to turn around and choose a different path for our beach's futures. We all know what happens when the floodgates are open and all bets are off, we've already begun to see it and it's heart breaking. Why ruin something so beautiful if we can take charge and preserve it? Keeping its value,

Mahalo nui for taking the time to read my opposition,

Natia

From: [jeff.baucom](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D8
Date: Thursday, December 12, 2024 2:13:40 PM

Hello,

I am writing to share my opposition to agenda item D8, as it violates act 16 prohibiting private shoreline hardening structures. Our oceans are among our greatest resources and only by ensuring the health of our oceans can we have hope for the future health of our community. Allowing private entities to harden shorelines for the purpose of protecting their own private property, we allow these private interests to take priority over the health of our land, ocean and communities. We must send a firm message that the days of simply armoring our shorelines is far past, we must work with nature and not against it, if we stand any chance of resilience in the face of climate collapse and unprecedented weather patterns. Shoreline hardening simply passes the problems of one section of shoreline onto it's neighbors, as well as seriously disturbing our precious marine life.

I urge you to vote no on this item for the sake of our future.

--

Best,
-Jeffrey Baucom

From: [Samantha Campbell](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] oppose item D8
Date: Thursday, December 12, 2024 3:52:13 PM

protect our beaches! these condos should have never been built - it is time to enforce the rules and prioritize private interests over public community access and health

~Samantha Campbell
Haiku, HI

Samantha Campbell, ATC, CSCS, LMT

www.deep2peak.com
Samantha@deep2peak.com
(808) 214-8224
@deep2peak

Dear Members of the BLNR,

As an owner of a Condominium at Hololani, I am writing to request that the Hololani Association be granted a right of entry to proceed with construction on state lands for our Rock Revetment project. We presently have the required permit to construct the Rock Revetment, and we are now seeking to gain the required right of entry to proceed with the project. The project will benefit the community in the following ways:

1. The project will protect the critical and public Lower Honoapiilani road and drainage system from deterioration resulting due to storm surges.
2. The project will improve access to the area for Maui residents and visitors.
3. The project will improve the safety of the area as the existing sandbags are deteriorating, slippery and unstable.
4. Finally, the Natural local rocks will greatly improve the appearance of the existing sandbags and provide an aesthetically pleasing shoreline to be enjoyed by all.

The aforementioned benefits provide the residents and visitors of Maui with tangible benefits to be enjoyed by all. In these tumultuous, post-fire days, many of our owners have opened their hearts and units to the distressed, displaced residents by volunteering and leasing their units to these ill-fated local residents. In this spirit of community comradery, we respectfully request that you grant us this right of entry. We appreciate your consideration in this matter. Thank you.

Sincerely,

Joe Garavaglia
Owner – Hololani B804

Aloha, my name is Heidi Beltz and I am testifying in opposition to agenda item D-8 on behalf of Surfrider foundation.

I am testifying to express my strong opposition to granting the right of entry and revocable permit to the Association of Apartment Owners of Hololani for the construction of a 400-foot-long rock revetment along the shoreline at Kahana Bay, Maui. This proposal threatens the public's access to beaches, accelerates the destruction of Hawaii's fragile coastal ecosystems, and contradicts the protections afforded by Act 16.

I live on the west side, and my family and I are active outrigger canoe paddlers. We do not feel safe bringing our kids to recreate or paddle near or adjacent to Hololani resort. There is zero public interest for a sea wall and even the BLNR staff report recognized the "impact on surrounding coastal environment caused by the sandbag revetment. It makes no sense that they would then grant a permanent seawall.

As a community member and advocate for sustainable coastal management, I urge the Board to deny the right of entry for the Hololani Resort's rock revetment. Upholding the principles of Act 16 and supporting equitable, long-term solutions to erosion is critical to preserving Hawaii's beaches, ecosystems, and cultural heritage.

Thank you for considering my testimony. I trust that the Board will act in the best interest of the public, the environment, and future generations by rejecting this proposal.

Mahalo for your time.

LOG OF BORING NO. 5

ELEVATION: see Plate 2

EQUIPMENT USED: Minuteman/Tripod Assembly

DEPTH OF BORING (FT.): 17.5

DATE DRILLED: August 13, 2010

DEPTH OF GROUNDWATER: 8.1 feet

DEPTH (FT.)	GRAPHIC SYMBOL	SOIL CLASSIFICATION	DESCRIPTION	SAMPLE NO.	BLOW COUNT	COLOR	MOISTURE	CONSISTENCY	DRY DENSITY (PCF)	MOISTURE CONTENT (% OF DRY WT.)	PENETROMETER (TIF)
0		MH	SILT with sand		41	brown	mod. moist to moist	stiff		14.1	
3		SM	silty SAND		7	dark brown		loose		12.4	
6		MH	SILT		7	very dark grayish brown	very moist	soft		26.7	
		SM	silty SAND					loose		34.9	
		cob	COBBLE								
		SM	silty SAND				sat.				
9		SP-SM	SAND with silt		9	dark gray		mod. dense		53.7	
12						grayish brown		loose to very loose		47.2	
		GM	silty GRAVEL with sand		3					35.7	
		SM	silty SAND							41.2	
15					1	very dark grayish brown				39.5	
										31.5	
18			END OF BORING AT 17.5 FEET							40.3	
21											

PROJECT NAME: HOLOLANI ROCK REVETMENT

ISLAND GEOTECHNICAL
ENGINEERING, INC.

PLATE

PROJECT NO.: 101406-FM

Geotechnical Consultants

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LOG OF BORING NO. 4

ELEVATION: see Plate 2

EQUIPMENT USED: Minuteman/Tripod Assembly

DEPTH OF BORING (FT.): 19.75

DATE DRILLED: August 13, 2010

DEPTH OF GROUNDWATER: 8.7 feet

DEPTH (FT.)	GRADING SYMBOL	SOIL CLASSIFICATION	DESCRIPTION	SAMPLE	BLOW COUNT	COLOR	MOISTURE	CONSISTENCY	DRY DENSITY (PCF)	MOISTURE CONTENT (% OF DRY WT.)	PENETROMETER (TSF)
0		MH	SILT with gravel		15	very dark grayish brown	moist	mod. stiff		25.6	
								stiff			
3		SP	SAND with gravel			dark reddish brown		mod. dense		23.3	
		MH	sandy SILT		19			very stiff		23.1	
6		SM	silty SAND			dark yellowish brown		loose		4.6	
		MH	SILT		6			mod. stiff		23.8	
							very moist				
9		SM	silty SAND with gravel			dark grayish brown	sat.	mod. dense		26.3	
		MH	sandy SILT		20			very stiff		16.2	
12		SP-SM	SAND with slit					mod. dense		36.5	
					3			very loose			
15											
18						very dark grayish brown		mod. dense		26.7	
		SM	silty SAND with gravel		16					43.6	
21			END OF BORING AT 19.75 FEET								

PROJECT NAME: HOLOLANI ROCK REVETMENT

ISLAND GEOTECHNICAL
ENGINEERING, INC.

PLATE

PROJECT NO.: 101406-FM

Geotechnical Consultants

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LOG OF BORING NO. 3

ELEVATION: see Plate 2

EQUIPMENT USED: B-59 Drill Rig

DEPTH OF BORING (FT.): 19.5

DATE DRILLED: June 9, 2010

DEPTH OF GROUNDWATER: 8.6 feet

DEPTH (FT.)	SOIL CLASSIFICATION	DESCRIPTION	SAMPLE	BLOW COUNT	COLOR	MOISTURE	CONSISTENCY	DRY DENSITY (PCF)	MOISTURE CONTENT (% OF DRY WT.)	PENETROMETER (TIF)
0	SM	silty SAND with gravel			dark grayish brown	mod. moist to moist	very dense		6.2	
3										
4	MH	sandy SILT			dark brown		stiff		14.9	
5	SP- SM	SAND with silt		27	dark yellowish brown		mod. dense		6.4	
6						very moist				
9	SP- SM	SAND with silt and gravel				sat.				
10				13	dark gray to grayish brown				42.4	
12	SP	SAND							38.5	
15	CL	CLAY			very dark gray to dark gray		stiff		43.8	
16	rock	ROCK: porous	45/2'				soft rock		12.4	
18		Core Run #1: 17.5' to 19.5' Rec. = 46% RQD = 33%					mod. hard rock			
19.5		END OF BORING AT 19.5 FEET								
21										

PROJECT NAME: HOLOLANI ROCK REVETMENT

ISLAND GEOTECHNICAL
ENGINEERING, INC.

PLATE

PROJECT NO.: 101406-FM

Geotechnical Consultants

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LOG OF BORING NO. 2

ELEVATION: see Plate 2

EQUIPMENT USED: B-59 Drill Rig

DEPTH OF BORING (FT.): 21.5

DATE DRILLED: June 9, 2010

DEPTH OF GROUNDWATER: 8.7 feet

DEPTH (FT.)	GRADING SYMBOL	SOIL CLASSIFICATION	DESCRIPTION	SAMPLE NO.	BL. OVER FOOT	COLOR	MOISTURE	CONSISTENCY	DRY DENSITY (PCF)	MOISTURE CONTENT (% OF DRY WT.)	PENETROMETER (TSF)
0		ML	SILT (topsoil)			dark brown	moist	stiff		29.8	
		GM	silty GRAVEL with sand					mod. dense		8.3	
		SP	SAND		19	yellowish brown				9.3	
3		SP	clnder SAND			reddish brown					
		SM	silty SAND with gravel		32	brown		dense		18.1	
6							moist to very moist	mod. dense			
9							sat.				
		SP-SM	SAND with silt			dark gray				47.1	
		SP	SAND		18	olive gray to dark gray brown				37.7	
12											
15						reddish brown				37.6	
		GM	silty GRAVEL with sand		16					46.7	
18		rock	ROCK, weathered			dark gray		soft to mod. hard rock			
			Core Run #1: 19' to 21.5' Rec. = 33% RQD = 30%		23/0'						
21		CL	CLAY			very dark gray		stiff		38.3	
			END OF BORING AT 21.5 FEET								

PROJECT NAME: HOLOLANI ROCK REVETMENT

ISLAND GEOTECHNICAL
ENGINEERING, INC.

PLATE

PROJECT NO.: 101406-FM

Geotechnical Consultants

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LOG OF BORING NO. 1

ELEVATION: see Plate 2

EQUIPMENT USED: B-59 Drill Rig

DEPTH OF BORING (FT.): 20.5

DATE DRILLED: June 9, 2010

DEPTH OF GROUNDWATER: 8.4 feet

DEPTH (FT.)	GRAPHIC SYMBOL	SOIL CLASSIFICATION	DESCRIPTION	SAMPLE NO.	BLOWS/FOOT	COLOR	MOISTURE	CONSISTENCY	DRY DENSITY (pcf)	MOISTURE CONTENT (% OF DRY WT.)	PERMEABILITY (in/sec)
0		ML	sandy SILT with gravel			brown	moist to	very stiff		15.6	
		MH/ML	SILT with sand		58	dark brown	very moist			45.8	
3											
		SM	silty SAND		11	brown	moist	mod. dense		10.6	
6											
9		GM	silty GRAVEL with sand				sat.				
		SP-SM	SAND with silt		13	gray				55.3	
						light yellowish brown				39.6	
12											
					9	very dark grayish brown		loose		45.9	
15											
18											
		rock	ROCK		206	black		mod. hard rock		18.0	
21			END OF BORING AT 20.5 FEET								

PROJECT NAME: HOLOLANI ROCK REVETMENT

ISLAND GEOTECHNICAL
ENGINEERING, INC.

PLATE

PROJECT NO.: 101408-FM

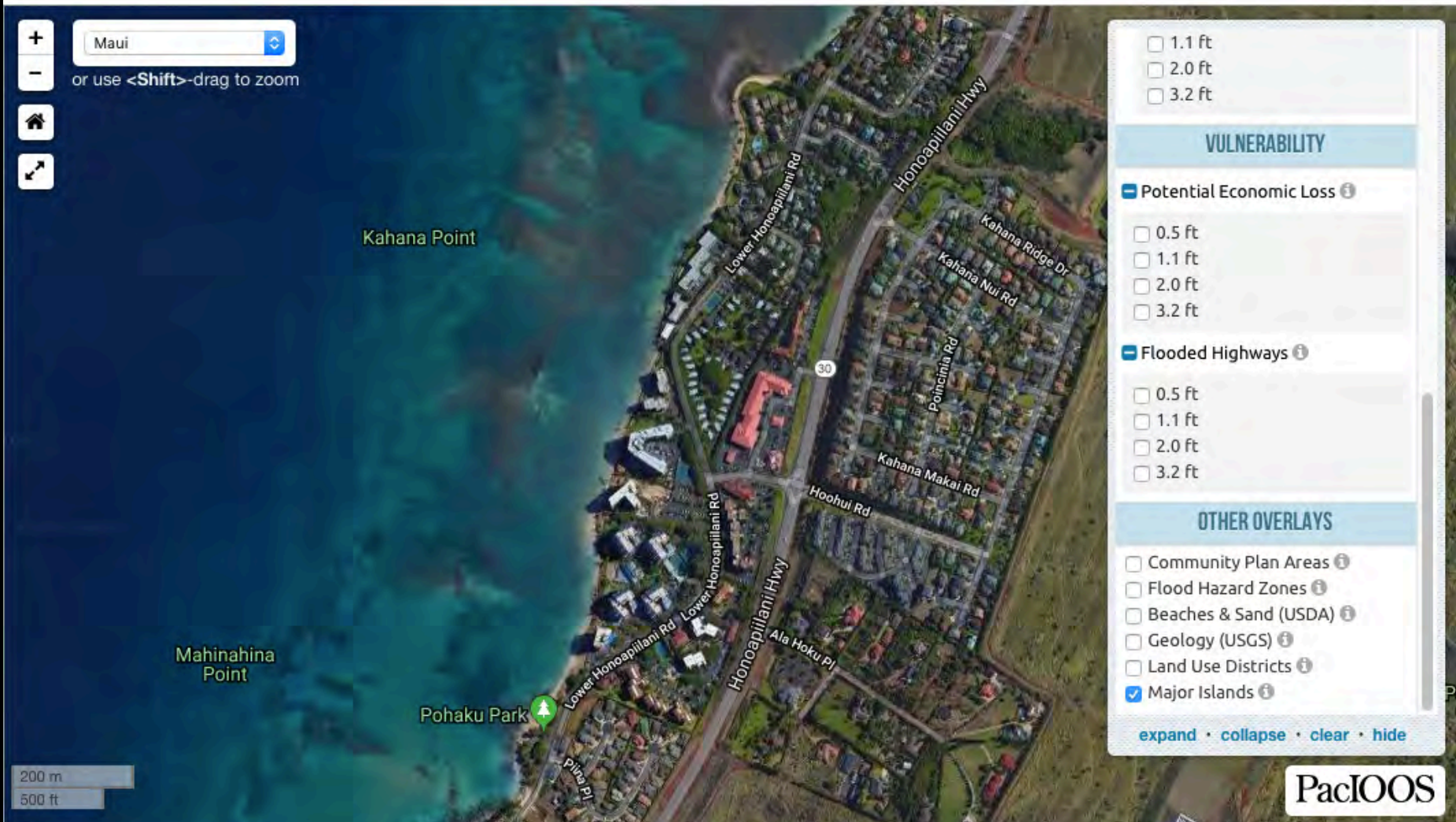
Geotechnical Consultants

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Sea Level Rise : Hawai'i Sea Level Rise Viewer

Current

1



Sea Level Rise : Hawai'i Sea Level Rise Viewer

Underlying Beaches and Sand

2



Sea Level Rise : Hawai'i Sea Level Rise Viewer

Beaches and Sand Above High Water in 2100

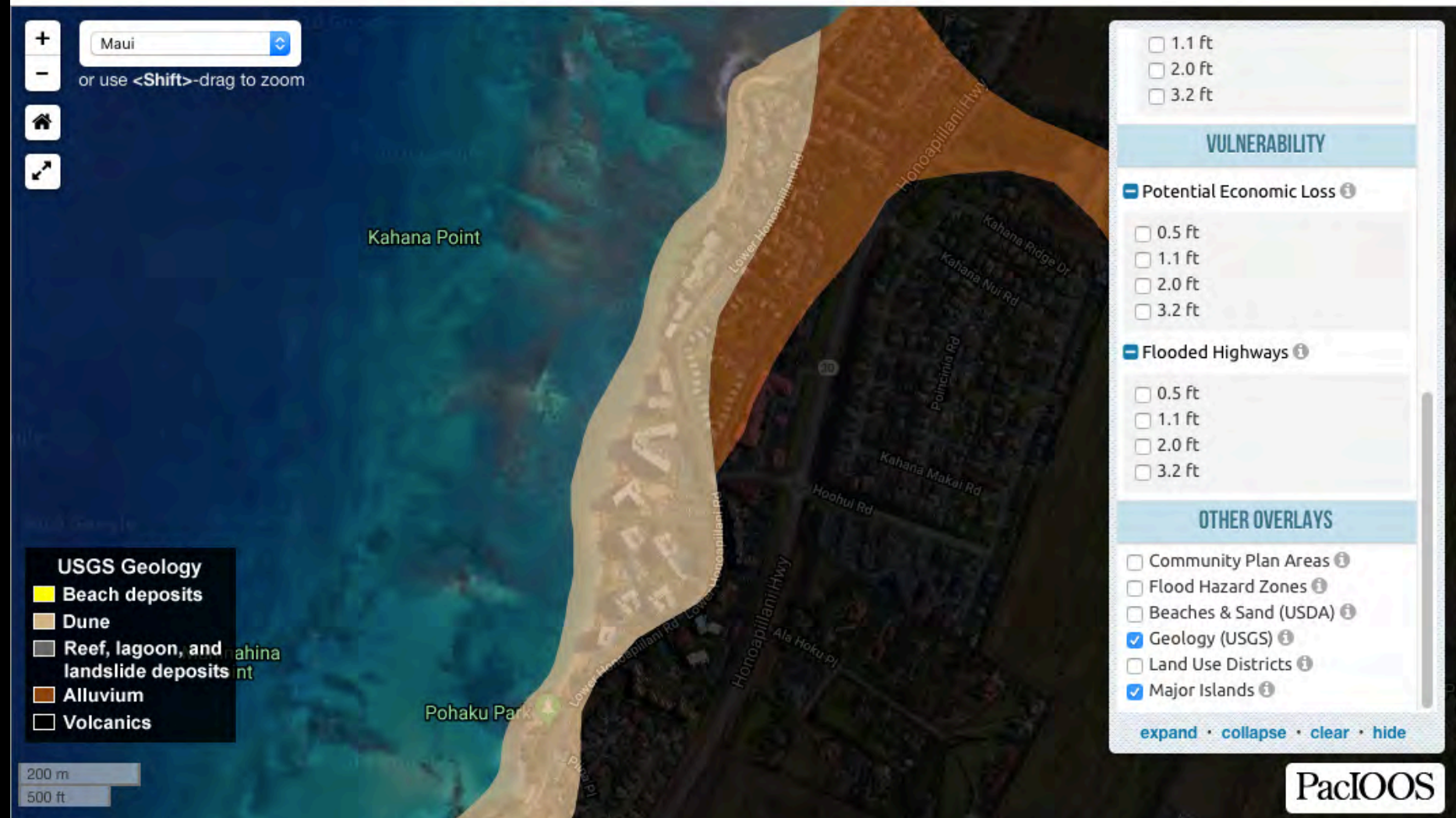
3



Sea Level Rise : Hawai'i Sea Level Rise Viewer

Underlying Dunes

4



Sea Level Rise : Hawai'i Sea Level Rise Viewer

Underlying Dunes Above High Water 2050

5



Sea Level Rise : Hawai'i Sea Level Rise Viewer

Underlying Dunes Above High Water 2100

6



Sea Level Rise : Hawai'i Sea Level Rise Viewer

FEMA Flood Zones

7



Sea Level Rise : Hawai'i Sea Level Rise Viewer

Erosion Line by Foot

8



Sea Level Rise : Hawai'i Sea Level Rise Viewer

Annual High Wave Flooding 2100

9



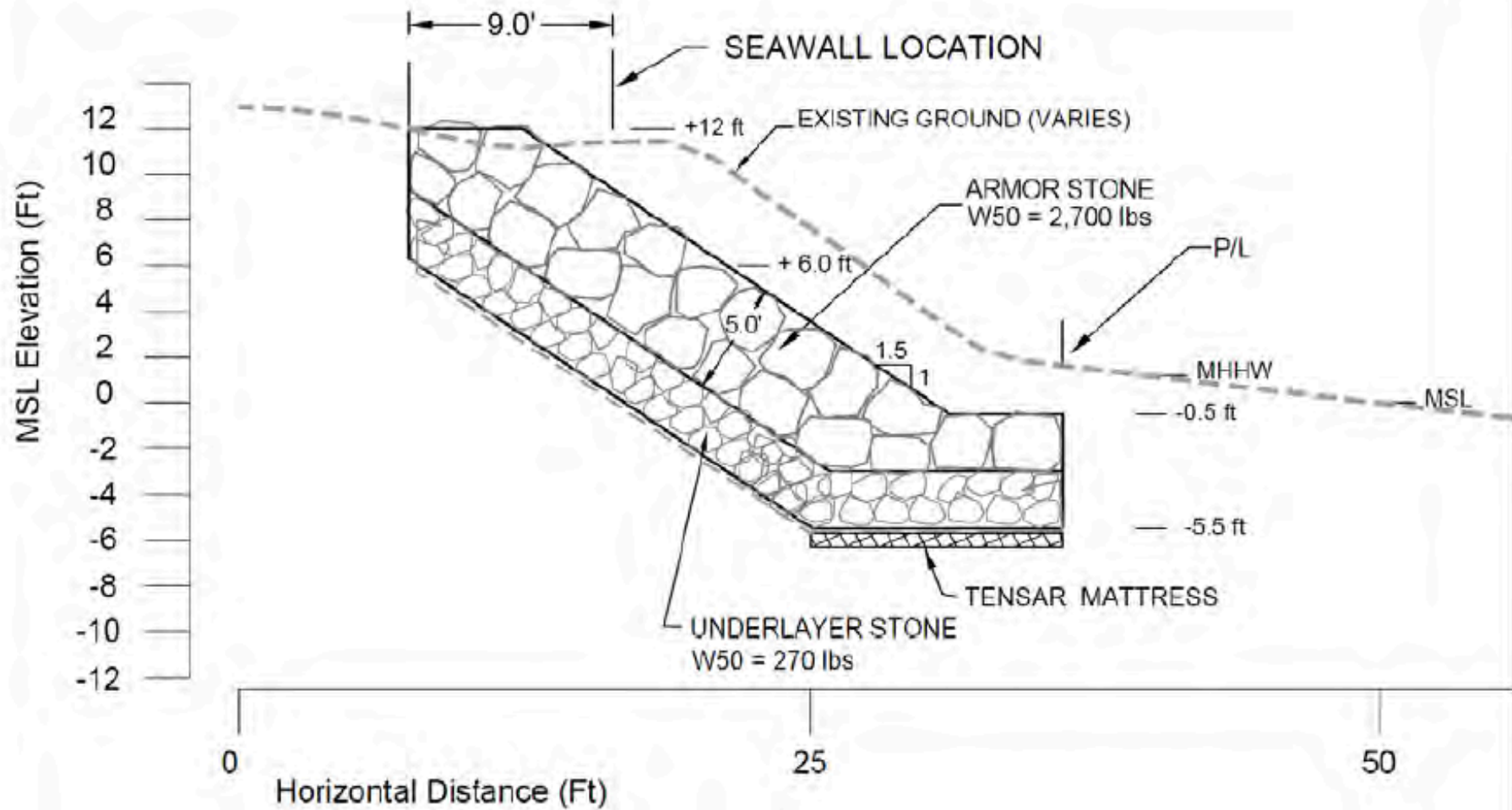


Figure 3-2. Design cross-section for full revetment structure

LOG OF BORING NO. 2				ELEVATION: see Plate 2								
EQUIPMENT USED: B-59 Drill Rig				DEPTH OF BORING (FT.): 21.5								
DATE DRILLED: June 9, 2010				DEPTH OF GROUNDWATER: 8.7 feet								
DEPTH (FT.)	GRAPHIC SYMBOL	SOIL CLASSIFICATION	DESCRIPTION	SAMPLE NO.	BLOWS/FOOT	COLOR	MOISTURE	CONSISTENCY	DRY DENSITY (PCF)	MOISTURE CONTENT (% OF DRY WT.)	PERCENT WATER (WET)	
0		ML	SILT (topsoil)			dark brown	moist	stiff		29.8		
		GM	silty GRAVEL with sand					mod. dense		8.3		
		SP	SAND	19		yellowish brown				9.3		
3		SP	clinder SAND			reddish brown						
		SM	silty SAND with gravel	32		brown		dense		18.1		
6							moist to very moist					
								mod. dense				
9							sat.					
		SP-SM	SAND with silt			dark gray				47.1		
		SM										
		SP	SAND	18		olive gray to dark gray brown				37.7		
12												
15												
		GM	silty GRAVEL with sand	16		reddish brown				37.5	46.7	
18		rock	ROCK, weathered	23/0"		dark gray		soft to mod. hard rock				
			Core Run #1: 19' to 21.5" Rec. = 33% RQD = 30%									
21		CL	CLAY END OF BORING AT 21.5 FEET			very dark gray		stiff		38.3		
PROJECT NAME: HOLOLANI ROCK REVETMENT				ISLAND GEOTECHNICAL ENGINEERING, INC. Geotechnical Consultants							PLATE 4	
PROJECT NO.: 101408-FM												

LOG OF BORING NO. 3

EQUIPMENT USED: B-59 Drill Rig

DATE DRILLED: June 9, 2010

ELEVATION: see Plate 2

DEPTH OF BORING (FT.): 19.5

DEPTH OF GROUNDWATER: 8.6 feet

DEPTH (FT.)	GRAPHIC SYMBOL	SOIL CLASSIFICATION	DESCRIPTION	SAMPLE NO.	BLOWS/FOOT	COLOR	MOISTURE	CONSISTENCY	WET DENSITY (pcf)	MOISTURE CONTENT (% OF DRY WT.)	PENETROMETER (TSI)
0		SM	slity SAND with gravel			dark grayish brown	mod. moist to moist	very dense		6.2	
3		MH	sandy SILT			dark brown		stiff		14.9	
6		SP-SM	SAND with silt		27	dark yellowish brown		mod. dense		6.4	
9		SP-SM	SAND with silt and gravel				very moist				
12		SP	SAND		13	dark gray to grayish brown	sat.			42.4	
15		CL	CLAY			very dark gray to dark gray		stiff		43.8	
18		rock	ROCK: porous		45/2"			soft rock		12.4	
21			Core Run #1: 17.5' to 19.5' Rec. = 46% RQD = 33%					mod. hard rock			
			END OF BORING AT 19.5 FEET								

PROJECT NAME: HOLOLANI ROCK REVETMENT

PROJECT NO.: 101408-FM

 ISLAND GEOTECHNICAL
ENGINEERING, INC.

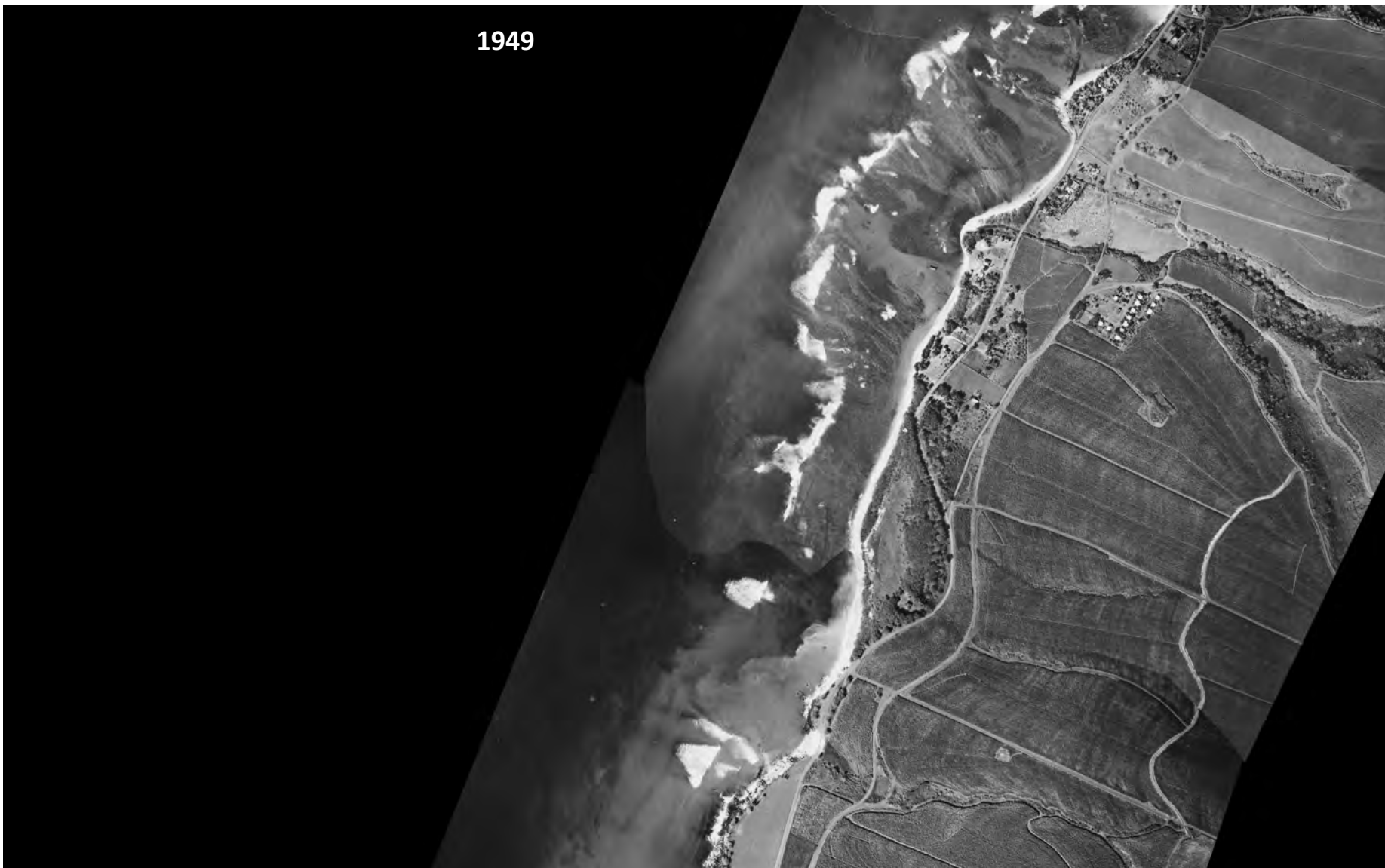
Geotechnical Consultants

PLATE

5

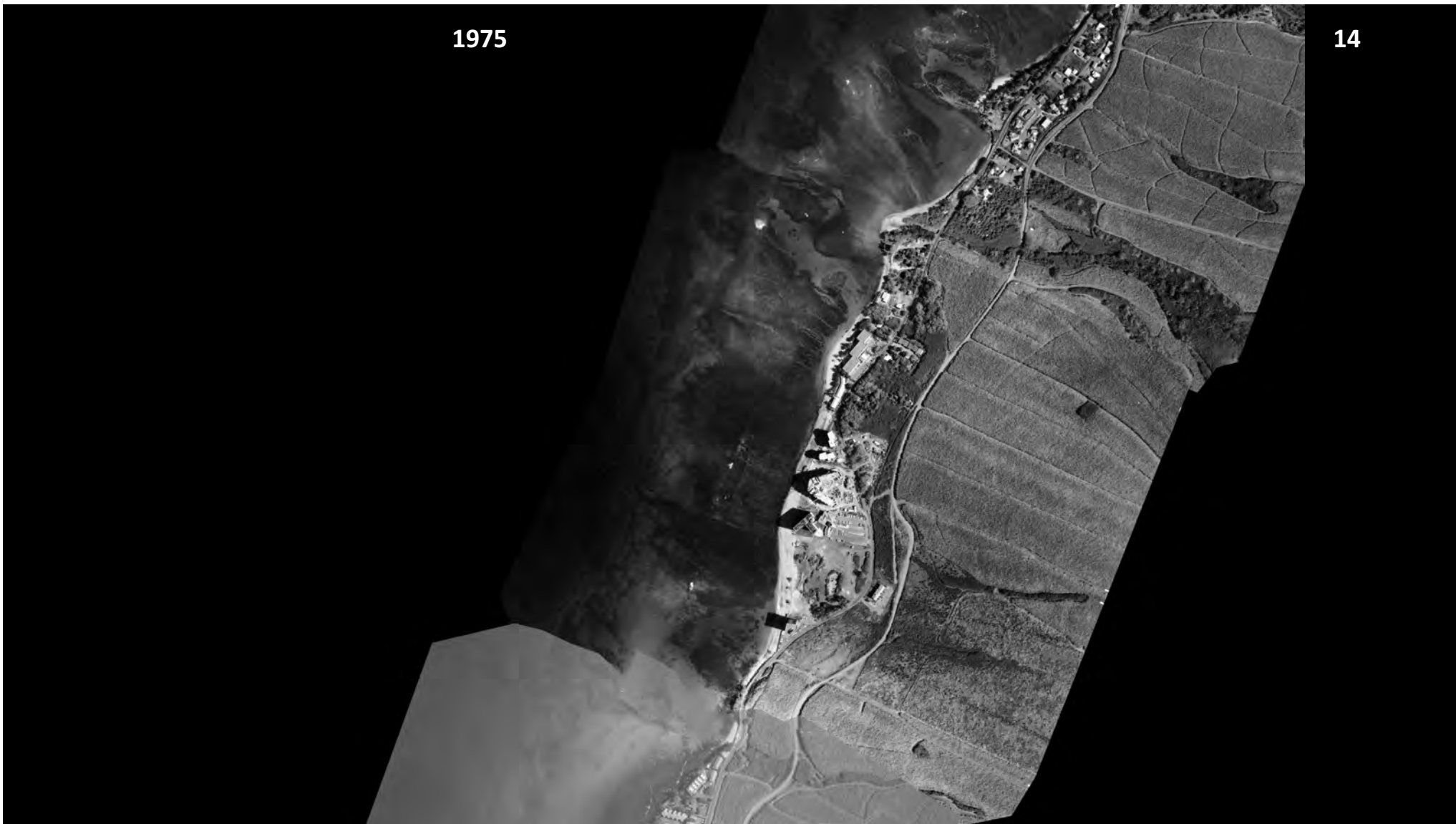
1949

13



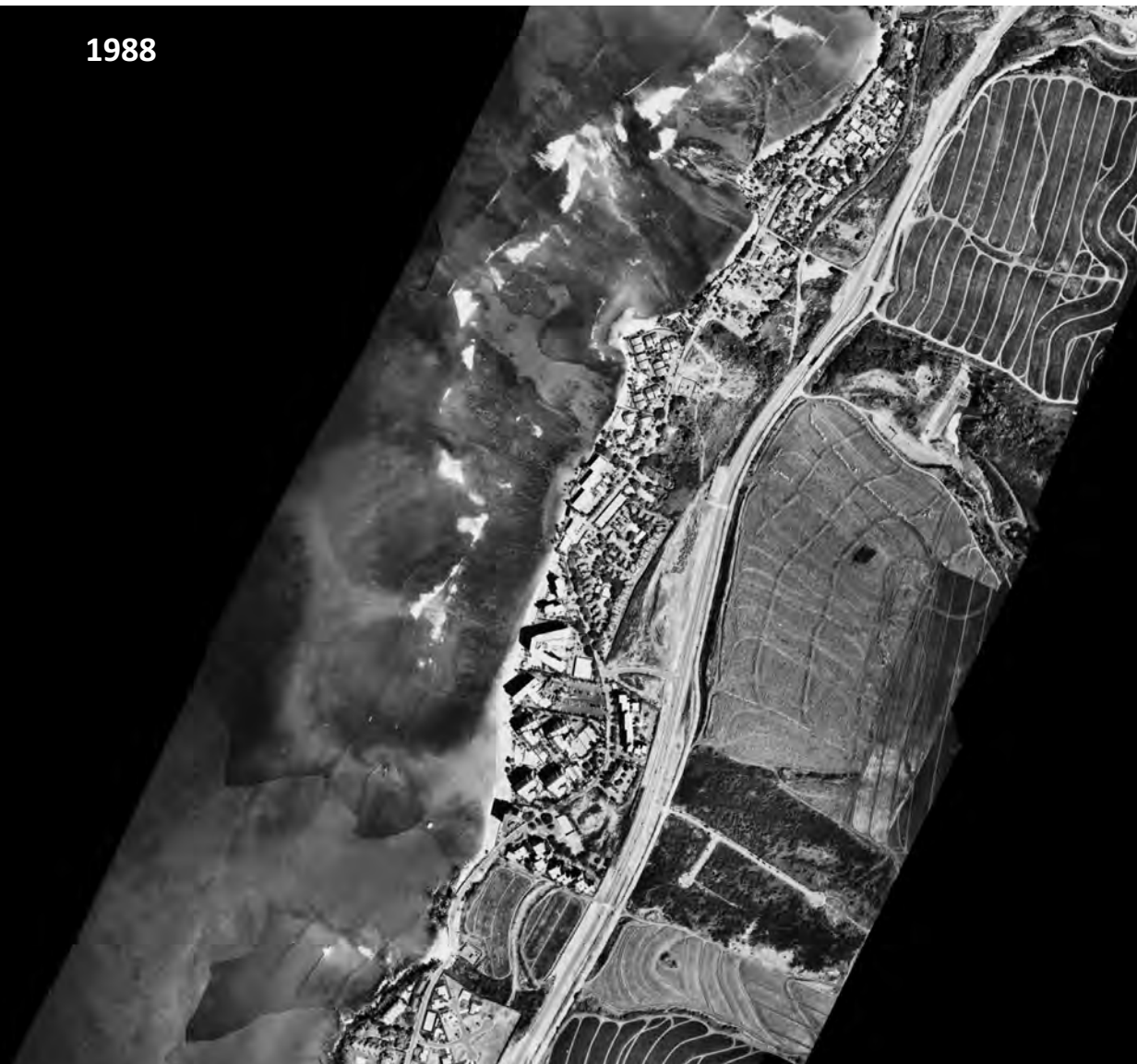
1975

14



1988

15



1987

16



1988

17



1997

18





Figure 1-1. Project site location

From: [Kailipeleuli Hopkins](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony against sea walls
Date: Thursday, December 12, 2024 8:46:39 PM

Aloha, my name is Ka'ili Hopkins, and I was raised on Maui. I oppose item D8 because shoreline hardening projects like Hololani's rock revetment destroy our beaches, which are vital for our culture, recreation, and environment. Please save our beaches for future generations and prioritize sustainable solutions that protect our island's natural resources. I oppose for the following reasons:

1. Shoreline hardening destroys public beaches, impacting cultural practices, recreation, and ecosystems.
 2. Sustainable, nature-based solutions should be prioritized to address coastal erosion without sacrificing public resources.
- Stay blessed

From: [Leslie Jaramillo](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Hololani condos
Date: Thursday, December 12, 2024 10:05:59 PM

Act 16 was created to protect sandy shorelines by banning private shoreline hardening structures like seawalls and revetments. Allowing this project would set a harmful precedent, prioritizing private property over the public's right to access and enjoy our beaches.

This rock wall is a violation of Act 16.... I DO NOT support this project as a native of Lahaina....

From: [Cienna Kaholokula](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] OPPOSE ITEM D8
Date: Thursday, December 12, 2024 3:43:00 PM

Hello, my name is Cienna,

I am writing to oppose Item D8, Hololani Seawall. I am born and raised from the island from the Island of Maui, I have been active in local activity since the age of 15 and have seen the negative impact of greed and I'm tired of seeing investors being put before the natives of the island. The reason I oppose item D8 it's because I believe it would do more destruction onto public resources surrounding and at the beach, and it will give the investors more of an opportunity to privatize the public beaches by making beach access impossible to get to.

From: [STK](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Opposition to Hololani Seawall
Date: Thursday, December 12, 2024 2:32:14 PM

Aloha Board Members,

I strongly oppose item D8. The construction of a 400-foot rock revetment in Kahana is a violation of Act 16 and a direct threat to Maui's beaches. Shoreline hardening projects like this have already resulted in the loss of over 4 miles of sandy beaches on Maui. The temporary sandbags in Kahana have degraded the coastline, and a permanent revetment will only worsen the erosion and environmental harm. Hawaii must adopt policies that prioritize sustainable, nature-based solutions over outdated methods. Please reject this proposal and protect Kahana's coastline.

Susan Kanehailua

From: [Alyssa Kuwana](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Opposing Item D8
Date: Thursday, December 12, 2024 9:26:22 PM

To whom it may concern:

Aloha, my name is Alyssa Kuwana, and I am writing to state that I oppose item D8. I believe that passing it will cause too much environmental damage and it is wrong to pass for the welfare of the community.

Mahalo for hearing my thoughts.

Alyssa Kuwana

From: [Jana-Nicole Laborte](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Hololani Shoreline Hardening project
Date: Thursday, December 12, 2024 7:06:31 PM

Aloha,

My name is Jana Laborte. No Lahaina, Maui mai au (I belong to Lahaina, Maui, I am of Lahaina, Maui, I from Lahaina, Maui.) As a Kanaka Maoli (Native Hawaiian) and kupa o ia aina nei (a native of this here land), I feel a deep responsibility to protect our aina and ensure its future for our keiki (children) and na hanauna e hiki mai ana (the generations yet to come.) I want my child to enjoy the same beaches I grew up on, but I have personally witnessed our beaches disappear due to shoreline hardening projects like the one proposed by Hololani. These actions prioritize private interests over public resources, destroying our environment and limiting access to cultural practices. He alii ka aina, he kaua ke kanaka. Land is chief, man is the servant. Aina will always survive without man, but man will not survive without aina. I urge the board to reject this proposal and protect the beaches that are central to our community and way of life.

Me ke aloha,
Jana-Nicole Laborte



**Testimony on item D-8 in Opposition to Right of Entry & Revocable Permit for the Hololani
Resort Rock Revetment**

Board of Land and Natural Resources

State of Hawai'i

Hearing on December 13, 2024

Re: Opposition to Item D-8, Amend Prior Board Approval of Item D-8, January 12, 2018: "Grant of Term, NonExclusive Easement to the Association of Apartment Owners of Hololani for Steel Sheet Pile Seawall and Rock Revetment Purposes; Issuance of Management Right of Entry; Kahana, Lāhainā, Maui, Tax Map Key: (2) 4-3-010: Seaward of 009," which would approve a construction and management right of entry and revocable permit to the Association of Apartment Owners of Hololani for steel sheet seawall and revetment purposes.

Dear Chairperson Chang and Members of the Board of Land and Natural Resources,

On behalf of the Surfrider Foundation, Maui Chapter, I offer my testimony against the Right of Entry (ROE) and Revocable Permit for Hololani Resort Rock Revetment.

The Surfrider Foundation is a national nonprofit organization dedicated to the protection and enjoyment of our ocean, waves, and beaches for all people. We advocate at federal, state and local levels to protect our shorelines on every coast and ensure beach access and coastal conservation.

Shoreline armoring, like the proposed 400 foot rock revetment at Hololani, exacerbates erosion on an already chronically eroding shoreline, impedes beach access and public trust recreational uses, and accelerates harm to and destruction of Hawai'i's fragile coastal ecosystems. Decades of scientific research demonstrate that shoreline armoring causes "flanking" erosion, undermining adjacent properties and accelerating the loss of public beaches. Public access is a right, and this project would deprive current and future generations of access to this vital resource.

Granting the Hololani Association of Apartment Owners the easement, ROE to approve construction of steel sheet seawall and proposed revetment flies in the face of the purpose and

principles of Act 16. In 2020, recognizing the chronic erosion facing Hawaii and the adverse harms caused by shoreline armoring and prioritizing the protection of the coastal ecosystem, the Hawaii Legislature passed Act 16, which strengthened protections in Hawaii's Coastal Zone Management Act, and prohibits the construction of private shoreline hardening structures including seawalls and revetments at sites with sand beaches, or where artificially fixing the shoreline may interfere with existing recreational and waterline activities, unless the clearly demonstrated to be in the interest of the general public. Here, there is absolutely zero public interest in covering and thereby destroying the beach, a public trust resource, with a rock revetment; such proposal is *solely* in the private interest of the applicant. granting this right of entry would violate this important legal protection, and prioritize private property interests over public resources.

Heightened Environmental Impacts and Lack of Accountability

The temporary sandbags currently in place since 2007 have already demonstrated the harmful effects of shoreline armoring - contributing to the degradation of coastal ecosystems and erosion. The staff report itself recognizes the "impact on the surrounding coastal environment caused by the continued presence of the sandbag revetment" and notes that it was never intended to serve as a long-term solution. However, transitioning to a permanent rock revetment would only serve to magnify these impacts, continuing to adversely impact the coastal community and environmental resources, by killing the beach. Additionally, while the sandbags are not a permanent solution, neither is a rock revetment.

Respectfully, the agencies, tasked with protecting Hawai'i's shorelands and the public trust, must follow Hawai'i's coastal laws and prioritize our public trust beaches over private development when determining appropriate long term solutions, such as requiring the inland relocation of at-risk development rather than destructive armoring.

It is Surfrider's understanding that the applicant has represented to the Board of Land and Natural Resources (BLNR) that they do not intend nor is there a clear or enforceable plan for restoring the shoreline or removing the revetment and seawall as required by the County as a condition of permitting. Additionally, the bond proposed for removal is insufficient to address the potential costs and environmental damages associated with dismantling such a structure.

Importance for Smart Coastal Management in the Face of Rising Seas

In the face of climate change, Hawaii must adopt *and follow* its existing coastal protection policies, such as Act 16, that prioritize nature-based solutions to coastal erosion over outdated hard armoring techniques. The approval of this revetment contradicts global best practices for adaptive shoreline management, which emphasize living shorelines, dune restoration, managed retreat, and other sustainable methods, as well as several state policies.

Haw. Rev. Stat. § 183C-1 provides, "The legislature finds that lands within the state land use conservation district contain important natural resources essential to the preservation of the State's fragile natural ecosystems and the sustainability of the State's water supply. It is

therefore the intent of the legislature to *conserve, protect, and preserve* the important natural resources of the State through appropriate management and use to promote their *long-term sustainability* and the public health, safety and welfare.” Approving this project contradicts the law’s clear purpose to conserve, protect and preserve the long-term sustainability of the beach.

Haw. Rev. Stat. § 171-35 regarding lease provisions, provides that every lease issued by the BLNR shall contain, where applicable, adequate protection of public beaches. The proposed revetment would not adequately protect the public trust beach at Hololani, but instead would guarantee its elimination.

By approving this project, the Board risks undermining community trust and Hawaii’s reputation as a global leader in environmental stewardship. This decision would send a signal to other property owners that shoreline hardening is acceptable, despite its well-documented harms. Further, the applicant does not have a vested right to construct the project; it has not obtained all required authorizations there for, and should be considered for compliance with Act 16.

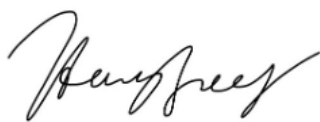
A Call for Leadership and Stewardship

The Board of Land and Natural Resources has an obligation to uphold the public trust and protect Hawaii’s natural resources. Act 16 was a landmark achievement in coastal preservation, reflecting a collective commitment to safeguarding Hawaii’s beaches for future generations. Allowing this project to move forward would erode the very foundation of that commitment.

As a community member and advocate for sustainable coastal management, I urge the Board to deny the right of entry for the Hololani Resort’s rock revetment. Upholding the principles of Act 16 and supporting equitable, long-term solutions to erosion is critical to preserving Hawaii’s beaches, ecosystems, and cultural heritage.

Thank you for considering my testimony. I trust that the Board will act in the best interest of the public, the environment, and future generations by rejecting this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read 'Hanna Lilley', written in a cursive style.

Hanna Lilley
Hawaii Regional Manager
Surfrider Foundation

From: [Don Mcleish](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D8
Date: Thursday, December 12, 2024 4:39:36 PM

To whom it may concern, I am of the opinion that in light of sea level rise and the decay of our reefs that we need to be proactive about armoring our shoreline and protecting infrastructure and shoreline developments within reason and hopefully go offshore with T-groins and artificial reefs to counter the ocean's energy and keep sediment from eroding and silting out the nearshore reefs. Most important is that you decision makers listen to the best sources of current science and factor in the various conflicts with an understanding of what the vested interests stand to lose or gain and not let inexperienced vocal objections have sway over science and pragmatic and realistic solutions. All viable solutions and paths should be considered but not wishful thinking or fantasy.

Sincerely,

Don McLeish
62 Haku Hale Pl.
Lahaina, HI 96761

Cell - 510-388-2127
Cell - 808-280-0737
<http://dmcleish.com>

From: [Leila Morrison](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony to OPPOSE Item D-8
Date: Thursday, December 12, 2024 6:42:14 PM

Aloha,

I strongly oppose item D-8 as it violates Act 16 which protects Hawai'i's coastlines. Building a 400 ft rock revetment in Kahana will ONLY protect PRIVATE property and PRIVATE interests, NOT the interests of the general public and community of Kahana. Public beaches for all of their inherent value as ecosystems, public spaces, and cultural significance MUST be protected -- not altered and degraded in the interest of protecting and preserving private property. Public beach access and the existence of public beaches must be protected for both their casual enjoyment by residents and visitors alike, but also for the cultural significance and connection they provides for Hawaiians and kama'āina. Beaches make Hawai'i Hawai'i. To allow their further degradation and destruction, which is what this item will enable, is contradictory to the protection of land and natural resources that BLNR is charged with. Again, I strongly OPPOSE item D-8 and I hope you will too. Mahalo for your time.

Leila Morrison

From: [j.p](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony opposing item D8
Date: Thursday, December 12, 2024 8:38:10 PM

Aloha, I am writing today to express that I strongly oppose item D8. I've lived in Kahana my entire life and am very concerned about the current shoreline hardening project that is being proposed. The damage witnessed from the shoreline projects of the past are very apparent in our community here, every bit of erosion problem that already is occurring stems from after effects of attempts from the past to harden the coast for roads, hotels and condos. There's no amount of money paid for rent to the county worth causing further damage and destroying any more of the already greatly affected reef. Future generations don't deserve any more of a mess than has already been created. Kahana needs new approaches such as urgent retreat and coastal plant restoration to finally start to fix what we still can. Please realize that the Hololani owners are mostly outside investors who care more about their wallets than the health of our precious island. It's time to do right in this generation, please don't repeat the same mistakes that were made before us!

Sincerely, John Pitzer

From: [Kathleen Roberts](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] oppose Agenda item D8
Date: Thursday, December 12, 2024 9:13:09 PM

Aloha DLNR

I oppose giving approval to Hololani condo to build a 400 foot rock revetment in Kahana. This would threaten our public beaches and violate act 16.

Mahalo

Kathleen Roberts

5180 Kupele Pl Apt F

Lahaina HI 96761

Sent from my iPhone

From: [lucienne denaie](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] D-8 Testimony from Sierra Club Maui
Date: Friday, December 13, 2024 12:17:52 AM

Testimony from Sierra Club Maui Group Re. Item D-8 BLNR DEcember 13, 2024 agenda

Subject: Opposition to proposed Right of Entry and Revocable Permit for Hololani Resort Rock Revetment

DEAR CHAIR CHANG AND BLNR MEMBERS

It is the policy of Sierra Club, Hawai'i Chapter, to support actions that will protect the land, water, and ocean resources of Hawai'i from environmentally damaging and other inappropriate uses, and actions that will preserve those resources for future generations. We stand in opposition to the right of Entry and Revocable Permit being requested by the Association of Apartment Owners of Hololani. You are being urged today to grant the landowner /investors of a two 50 year old eight story vacation rentals crammed onto lot a little under 1.5 acres the right to construct a 400 ft long rock revetment along the shoreline of Kahana bay, Maui.

Kahana Bay is a beloved public resource. The construction of the Hololani resort building in 1974 had little environmental review and the property owners were allowed to replace a dynamic shoreline ecosystem of sandy beaches with two towering buildings, a swimming pool and cement deck and a lawn. Naturally, when the sandy beach along Kahana bay tried to follow its natural processes of sand depletion and sand accretion, there were two large concrete structures in the way.

The Hololani has been fighting against nature for many years. Even its guests frequently comment that they are surprised to see only sandbags, and not beach in front of the resort. There does not appear to be any education given to guests about the trade offs of having their nice place to stay with lovely views of playful whales come at the price of the longterm disruption of a natural coastal ecosystem and the rights the public enjoys to access public beach lands and waters in our state of Hawaii.

We already see the damage the tempoary sandbags that have fronted the property for more than 15 years have done -contributing to the degradation of coastal ecosystems and erosion along the shoreline. There also seems to be no clear assurance that the shoreline will be restored or the revetment eventually removed- even though the county permit condition requires that action to be taken.

Act 16 offers important protections for our fragile coastal ecosystems by prohibiting the construction of private shoreline hardening structures, such as seawalls and revetments, on sandy beaches. The proposed RoE and permit would allow activities that directly contradict Act 16. The Honolani revetment might be great for the Apartment owners, but it comes with longer term impacts, since it would harden the shoreline, further accelerating erosion and permanently diminishing public beach access. Decades of scientific research demonstrate that

shoreline armoring causes “flanking” erosion, undermining adjacent properties and accelerating the loss of public beaches. Public access to our shoreline has been greatly diminished along the coast of west Maui. Public beach access is a right, and we urge the Land Board members to deny this proposed RofE and permit and stand to protect that access for current and future generations.

Act 16 was a landmark achievement in coastal preservation, reflecting a collective commitment to safeguarding Hawaii’s beaches for future generations. Allowing this project to move forward would erode the very foundation of that commitment. Please deny this request and follow the intent of our State Constitution and our state laws.

Mahalo nui loa

Lucienne de Naie

Chair, Sierra Club Maui Group

From: [Barney Stephenson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] OPPOSE Agenda item D8
Date: Thursday, December 12, 2024 8:34:03 PM

Aloha,

I am writing to oppose any and all hardening of our shorelines. I am currently a resident of Hololani. I am a Lahaina fire survivor and am here until my home is rebuilt. This is not about resorts or homes. We need to protect our island. For generations. Please deny this and all future requests to harden the Maui shoreline and ruin the natural flow.

Say no to Hololani. Say no to Kahana Sands. So no to Kaanapali. So no to everyone.

Mahalo,

Barn
Hololani Temporary FEMA Resident