

From: [samuel ako](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D8
Date: Saturday, December 14, 2024 6:03:31 AM

I OPPOSE Agenda D8. Act 16 protects our sandy shorelines by banning seawalls and revetments which threatens our public beaches and violates Act 16.

Sharon Ako

Sent from my iPhone

From: [consuelo apolo-gonsalves](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D8
Date: Friday, December 13, 2024 8:07:49 AM

I Consuelo Apolo-Gonsalves Oppose to item Agenda D8 Mahalo

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: [Maui Ocean Friendly Gardens](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Zoom testimony agenda item D-8
Date: Friday, December 13, 2024 8:13:20 AM

Aloha, I am writing 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.

Violations of Act 16 and Public Beach Access

Act 16 prohibits the construction of private shoreline hardening structures, such as seawalls and revetments, on sandy beaches. It was enacted to protect public beach access and preserve Hawaii's natural shoreline ecosystems, which are already under immense threat from climate change and rising sea levels. Granting this right of entry would directly contravene these legal protections, setting a harmful precedent that prioritizes private property interests over public resources.

The proposed revetment would harden the shoreline, further exacerbating 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 is a right, and this project would deprive current and future generations of access to this vital resource.

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. Transitioning to a permanent rock revetment would magnify these impacts, leading to further environmental harm. The applicant, stated to 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 County 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.

Broader Implications for Climate Change and Coastal Management

In the face of climate change, Hawaii must adopt policies that prioritize nature-based solutions to coastal erosion over outdated hardening 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.

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.

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,

Heidi Beltz

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 Revocacable 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: [Jessica Freeman](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Item D8 Testimony
Date: Friday, December 13, 2024 4:56:19 PM

Aloha,

I am writing testimony to oppose Item D8, the building of the Hololani seawall. This project, if allowed, would destroy precious marine resources along the West Maui coast line. Sea walls contribute to erosion and degradation of the near shore environment, with far reaching consequences. In addition to environmental damages, beaches in Hawai'i are a public trust resource. Prioritizing private interests over local community access sets a dangerous precedent, which could allow further destruction of Hawaiian lands for offshore investors. Oppose the construction of the Hololani seawall and instead focus on restoring and preserving Maui's vital marine ecosystems and the local community that utilizes them. Say NO to Item D8!

Mahalo nui loa,
Jess Freeman
Marine biologist and concerned Maui resident

From: [Joe Garavaglia](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Right of entry request - Hololani
Date: Friday, December 13, 2024 6:56:59 AM
Attachments: [Dear Members of the BLNR.docx](#)

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

From: [Hailani Keahi](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] OPPOSE ITEM D8
Date: Friday, December 13, 2024 9:03:38 AM

Aloha, I strongly oppose item D8. Allowing Hololani Condominium to build a 400-foot rock revetment in Kahana would set a harmful precedent that undermines Act 16, a law designed to protect Hawaii's sandy beaches. For over 15 years, temporary sandbags have caused erosion and damaged the natural environment. A permanent revetment will only amplify this destruction. It is time to embrace sustainable, nature-based alternatives that address coastal erosion without sacrificing our beaches. Please reject this proposal and preserve Kahana's coastline.

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.

**From: Albert Perez, Executive Director
Maui Tomorrow Foundation**

To: Chairperson Chang and Members of the Board of Land and Natural Resources

Date: December 13, 2024

Re: Item D.8: Right of Entry & Revocable Permit for the Hololani Resort Rock Revetment

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

Maui Tomorrow Foundation is strongly opposed 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, will accelerate the destruction of Hawaii's fragile coastal ecosystems, and contradicts the protections afforded by Act 16.

Violations of Act 16 and Public Beach Access

Act 16 prohibits the construction of private shoreline hardening structures, such as seawalls and revetments, on sandy beaches. It was enacted to protect public beach access and preserve Hawaii's natural shoreline ecosystems, which are already under immense threat from climate change and rising sea levels. Granting this right of entry would directly contravene these legal protections, setting a harmful precedent that prioritizes private property interests over public resources.

The proposed revetment would harden the shoreline, further exacerbating erosion and permanently diminishing public beach access. Decades of scientific research demonstrate that shoreline armoring causes "flanking" erosion, undermining adjacent properties, encouraging their owners to also want to harden their shorelines, 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. The BLNR has a responsibility to protect the beach as a public trust resource – not to protect private property that was unwisely place in harm's way in what has been well known for decades to be a dynamic environment.

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. Placing a permanent rock revetment here would magnify these impacts, leading to further environmental harm. The applicant, stated to 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 Maui County 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.

Broader Implications for Climate Change and Coastal Management

In the face of climate change, Hawaii must adopt policies that prioritize nature-based solutions to coastal erosion over outdated hardening techniques. The approval of this revetment would contradict global best practices for adaptive shoreline management, which emphasize living shorelines, dune restoration, managed retreat, and other sustainable methods.

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.

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 an advocate for sustainable coastal management, Maui Tomorrow Foundation urges 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. We trust that the Board will act in the best interest of the public, the environment, and future generations by rejecting this unwise proposal.

Mahalo.

From: [David Rickard](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Re: Support for Rock Revetment and Beach Nourishment in the Kahana Bay Area
Date: Friday, December 13, 2024 9:05:31 AM

Aloha Members of the Hawai'i Board of Land and Natural Resources,

I am writing to express my strong support for the proposed rock revetment along the oceanfront of the Hololani Condominium, as well as the beach nourishment and T-groin installation project in Kahana Bay, as put forward by the Kahana Bay Steering Committee. While I acknowledge that this solution may not be popular with everyone, it is a necessary measure to protect not only the Hololani Condominium but also other nearby structures, which are vital to the local economy and community.

These condominiums provide much-needed housing and employment opportunities, particularly in light of the recent devastation caused by the Lahaina wildfire. Many residents now rely more heavily on the Kahana Bay area for their livelihoods, and the preservation of these properties is essential to maintaining that support. Without a concerted effort to protect these buildings from further erosion, there could be lasting harm to the local economy and the people who depend on it.

The planned beach nourishment and T-groin projects offer not just a way to safeguard the area, but also a chance to enhance the environment. These efforts will create recreational spaces for residents and visitors, boost local tourism, and foster educational opportunities for future generations about the island's cultural and natural resources. The revetment and groins will help restore habitats for marine life and provide safe areas for fishing and other ocean activities. The cultural significance of these resources cannot be overstated, and I am confident that these projects will help preserve and celebrate our Hawaiian heritage.

As a member of the Bechert family estate, the original owners of this land, I speak on behalf of my family members who still reside on Maui and Oahu and own property along Kahana Bay. Our family has deep ties to this land and to the traditions and values of the Hawaiian people. We understand the importance of preserving our heritage while also adapting to the realities of the modern world. The proposed rock revetment and beach nourishment project represent a balanced approach to achieving that goal.

I respectfully urge you to approve these projects to protect the structures in the Kahana Bay area, restore the shoreline, and create sustainable, educational spaces for the community. Doing nothing risks further harm to the environment and the people who depend on it. Let us take action now to preserve this precious land for future generations.

Mahalo for your consideration of this important matter.

Sincerely,

David Rickard

From: [Athena Roebuck](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] D8
Date: Friday, December 13, 2024 2:17:04 PM

Aloha,
Please stop the crazy!!
I OPPOSE agenda item D8!!!!
Mahalo,
Athena Roebuck

Sent from my iPhone



Testimony in Opposition to Right of Entry & Revocable Permit for the Hololani Resort Rock Revetment

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

We, Lahaina Strong, strongly oppose the proposed right of entry and revocable permit for the Association of Apartment Owners of Hololani to construct a 400-foot-long rock revetment along Kahana Bay's shoreline. With one of our main missions being Heal the 'Āina we cannot stand for projects like this as it will do the exact opposite. This project threatens public beach access, will accelerate coastal erosion in the area, puts the environment that we all depend on at risk, and violates protections established under Act 16.

Violations of Act 16 and Public Beach Access

Act 16 was passed to stop projects exactly like this one. It also prohibits shoreline-hardening structures like seawalls and revetments on sandy beaches to preserve public access and protect Hawaii's coastlines. Building a massive seawall would speed up erosion, shrink our beaches, and block public access. Beaches in Hawaii aren't just scenic—they're cultural, environmental, and community gathering spaces. Scientific research has repeatedly shown that such structures worsen erosion through "flanking," destroying neighboring beaches and limiting public access. Allowing this project would set a dangerous precedent that prioritizes private interests over public rights.

Environmental Harm and Lack of Accountability

The sandbags currently in place since 2007 have already caused severe erosion and environmental damage. Replacing them with a permanent rock revetment would worsen these impacts. The applicant has also failed to present a clear, enforceable plan for restoring the shoreline or removing the structure as required by county permits. The proposed bond is insufficient to cover the environmental and financial costs of future removal.

A Call for Leadership and Stewardship

Hawaii must adopt climate-resilient solutions such as dune restoration, managed retreat, and living shorelines. Approving this project would undermine Act 16's protections, weaken public trust, and damage Hawaii's environmental legacy.

On behalf of the Lahaina Strong community, we urge the Board to DENY this permit and uphold its responsibility to protect public beach access, coastal ecosystems, and Hawaii's future.

With respect and aloha,

Lahaina Strong

From: [Lisa Santos](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] D8
Date: Friday, December 13, 2024 12:41:23 PM

Testimony:

Aloha, my name is Lisa Lopez, and I strongly oppose item D8. Projects like Hololani's proposed rock revetment destroy our public beaches and limit access for local families. These shorelines are not only recreational spaces but also vital to our culture and identity. The state must prioritize sustainable solutions that protect our environment and ensure future generations can enjoy our beaches.

Lisa

Sent via the Samsung Galaxy S23 Ultra 5G, an AT&T 5G smartphone

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From: [Jennifer Wirth](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Hololani Condo
Date: Friday, December 13, 2024 12:29:36 PM

Aloha

My name is Jennifer, and I'm emailing as a concerned resident of Maui. Please do not allow Hololani Condos in Kahana build a rock revetment on our public beach. It would be a violation of act 16. Taking their offer to pay rent to the state for the PUBLIC beach would set a dangerous precedent. What would stop any other resort or condominium complex along the shore to try the same thing? Imagine if every resort along Ka'anapali paid rent to the state for the beach in front to be private use. What would be left for residents to enjoy? Beaches are public and should remain that way.

Mahalo for your consideration

Jennifer Wirth

From: [Adam Zarro](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Support for Agenda Item D-8
Date: Sunday, December 15, 2024 8:51:56 PM

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

As a full-time resident of Hololani, I am writing to express my strong support for Agenda Item D-8, the Right of Entry request for constructing the proposed rock revetment. This project offers a practical, environmentally responsible, and community-focused solution that aligns with the Board's mission to serve the public good and protect state lands.

The proposed revetment addresses several critical concerns:

1. Enhanced Public Access and Safety:

The current shoreline is unsafe and difficult for lateral and vertical access due to erosion and deteriorating sandbags. The rock revetment will improve accessibility for beachgoers by creating a safer and more stable environment along the shoreline.

2. Aesthetic and Environmental Improvements:

The deteriorating sandbags are not only unsightly but also harmful to the marine environment. Replacing them with natural rock will enhance the visual appeal of the area and promote a healthier ecosystem by reducing debris and disruption caused by frequent maintenance.

3. Long-Term Reduction in State Land Disruption:

The sandbags currently require replacement every 3 to 7 years, necessitating repeated access to state lands for repairs. The rock revetment provides a permanent solution, eliminating the need for these ongoing disruptions and preserving the integrity of state lands.

4. Protection of Public Infrastructure:

The project will offer greater protection for Honoapiilani Road at the drainage easement, an area prone to flooding. It also safeguards the county drainage lines that run through this easement, ensuring these critical systems remain functional and reliable for the community.

By addressing these points, the proposed revetment strikes a thoughtful balance between environmental preservation, public safety, and the responsible management of state resources. Approving this request will benefit not only Hololani residents but also the broader community that relies on safe access, functional infrastructure, and a vibrant coastal environment.

I respectfully urge the Board to approve this application, recognizing the long-term benefits it will bring to the shoreline and the public.

Thank you for your time and consideration of this important matter.

Sincerely,
Adam Zarro
Maui Resident

[808 600 9123](tel:8086009123)

Sent from my iPhone