

**From:** [alohasunandsurf](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] April 25th AGENDA item J2 (OPPOSED)  
**Date:** Thursday, April 24, 2025 8:51:41 AM

---

Aloha BLNR, Chair Dawn Chang,

My interest in writing you today is regarding agenda item J-2. I'm not fully familiar with the business activities of the person behind this initiative, but I noticed a few things this project is requesting that prompted me to reach out with my concerns. It's my understanding that this project is operating on a revokable permit (discretionary) on a State land lease, and doing various activities that seem to be subject for environmental review, or at the very least, not exempt from it. My main contention is the issuance of HEPA 343 exemptions as one-offs to private businesses when they clearly meet the HEPA triggers, and other businesses or even public activities that operate in similar circumstances have had to do HEPA or have fully disclosed why they do not.

For example, one aspect of this project is "aquaculture including coral propagation"

There's only a small handful of facilities where this has been allowed. One is at the bio secure park, OTEC (Natural Energy Lab of Hawaii Authority) in Kailua Kona or the Anuenue Fisheries Research Center at Sand Island. Both of these places are operated by the State. Neither one were exempt from HEPA and in fact, OTEC has an EIS that is regularly supplemented. All of the needed infrastructure to conduct such a project is all spelled out and accounted for. Water source, delivery system, containment, and most importantly, discharge and testing of used water. Anuenue uses old wells that were drilled 80 feet down to supply water and these wells were installed decades ago. OTEC uses some sort of pipe system. They both discharge into pits that are monitored and tested regularly. There's protocol for all of this set forth by HEPA and their permit conditions. Anuenue has a very comprehensive coral restoration project and it's all viewable on their website <https://dlnr.hawaii.gov/coralreefs/hcrn/>

Where is all of this for this private sector project?

If the BLNR is inclined to grant an exemption despite all the clear HEPA triggers will this be the standard going forward? Will any and ALL private industry that wants to conduct such projects be given the same latitude? I believe that our community has the expectations that the BLNR applies discretion with some sort of uniformity and coherence.

I'm not suggesting this project be forced into HEPA compliance, but I am suggesting

that it shouldn't be treated special and given an exemption. Thank you for your time and consideration!

Mahalo,

Jake Richards

Kihei, Hawaii

Sent with [Proton Mail](#) secure email.

**From:** [Nonie Sores](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Opposing J-2  
**Date:** Thursday, April 24, 2025 8:23:00 AM

---

Board Members,

I am writing in strong opposition to J-2

Environmental review has been a center point on many issues in Hawaii recently.

HEPA(Hawaii Environmental Policy Act) has triggers, with the first being, is State land being used? In the J-2 proposal, it is.

Next, does it pertain to endangered or protected species? In the J-2 proposal, it is. Coral is not only protected state-wide, but federally and internationally so additional environmental review could possibly be necessary on a federal level.

Most, if not all aquaculture projects have come to a halt due to the Umberger ruling. All other aquaculture projects have an EIS. I would say a coral project asking for an exemption is in direct violation of the umberger ruling.

Regardless of the impacts of the project(positive or negative) environmental review must be done.

I oppose giving environmental review exemptions with this project and suggest you remove the "coral" aspect in J-2. In my opinion, a storage baseyard is hardly a place our precious resources like coral should be held, especially without environmental review.

Nonie