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**[EXTERNAL] Reject K - 1 KA 24-01**

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From Hope Kallai <lokahipath2@live.com>

Date Tue 4/7/2026 10:20 AM

To DLNR.BLNR.Testimony <blnr.testimony@hawaii.gov>

Aloha e DLNR:

Please reject K - 1: a Proposed Rule Amendment KA 24-01 to amend a portion of the existing portion of the Limited Subzone to General Subzone for the residential development of the Estates at Moloa'a Bay on TMK 490090002, Unit 4. This amendment does not serve any conservation needs and establishes a dangerous commercial precedence, allowing development on properties intended for preserving conservation values.

The other units of the Estates at Moloa'a Bay are on agricultural land. It is unknown what kind of agriculture will be performed on these steep slope "estates" or why one housesite was created on Conservation District land, Limited Subzone instead of keeping the residences on agricultural land. This Limited Subzone should not be amended.

The 85-acre bluff top ocean lands (TMK 490090030000), contiguous to this proposed development makai of the Moloa'a Hui lands were retained by the State of Hawaii during the 1932 Moloa'a Hui Partition Action for critical cultural access for fishing and gathering. Project developer was aware of Conservation District Subzone restrictions when creating the Agricultural Condominium lots and other alternatives could have been considered for 8 residences on the ~38 acres of agricultural zoned land, not Conservation District lands.

This property was formerly held by Joseph Luahine Huddy, son of Reverend George Manoa Huddy, as Lot 10-A of the Moloa'a Hui Lands. Both Kupuna were of men of significance on Kauai. Historic trails connect through the Estates at Moloa'a Bay and to a culturally significant, named spring and stream, Maliu. State Plat Map 3027 shows an "old road" through this property. The development of this agricultural condominium will restrict lateral coastal access on known historic cultural byways, just like Hapa Trail did.

