
[EXTERNAL] OPPOSE J-5, and grant Kate Thompson a Contested Case Hearing

From Maggie Hallahan <maggie@mhpv.net>

Date Fri 6/26/2026 4:23 AM

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

I am asking to be able to give testimony by zoom to oppose J-5

Aloha Chair Kanaka'ole and Members of the Board of Land and Natural Resources,[Introduce yourself here. For example:]My name is [Y1. I oppose Item J-5 -- DOBOR's request to deny Kate Thompson a Contested Case Hearing (CCH). I ask the Board to reject that request and grant the hearing.

2. 9,323 vehicles towed, only 34 citations issued at Ala Wai Small Boat Harbor -- a 99.64% tow rate. (source: government records, 2022-2025; see K. Thompson testimony)
3. DOBOR's plan for the new LPR camera car: "warning, warning, tow." No fine. No citation. The LPR vehicle should enforce parking like the Enterprise Services contract with ProPark at the Honolulu Zoo: "ticket, ticket, tow."
4. A small fine -- such as \$35.00 -- should be the first financial penalty, not a tow of \$165 or more. Hawaii law (HRS §200-14(b)) caps the first parking fine at \$100 -- yet the first financial penalty here is a \$165+ tow.
5. DOBOR says it cannot issue fines because it lacks the HARs -- yet it has never created them and the Board has never directed it to. The Legislature told them to fix it (SCR 58, 2026). Still no action.
6. DLNR should not tell the Legislature DOCARE issues citations at state harbors -- then average only 9 DOCARE tickets per year at Ala Wai Small Boat Harbor, fail to staff the harbor with DOCARE officers, and create an enforcement vacuum that led to more than 2,000 vehicles per year being towed. (source: government records, 2022-2025; see K. Thompson testimony)
7. Under Act 163 (2022), the Board retains the power to Amend the parking contract and could require a citation step before any tow. It never has. No one has explained why -- on the formal legal record.
8. A CCH is exactly how the public gets those answers -- under oath, on the record, with the Attorney General able to weigh in. Please grant Kate Thompson's petition.
9. Kate Thompson's formal analysis of DOBOR's denial recommendation identifies 12 specific failures -- including a misquoted statute, ignored Hawaii Supreme Court precedent (*Sierra Club v. BLNR*, 2025), withheld citation data, and DOBOR's own in-house attorney testifying before the Legislature that only the Attorney General can determine whether a law is needed to reinstate a citation step in sub-contracted parking management concessions. There seems to be no valid basis to deny this hearing, and I hope the Board sees this as an opportunity to formally define the law and set a fair enforcement standard for the future.

Maggie Hallahan

maggie@mhpv.net

[EXTERNAL] OPPOSE J-5, and grant Kate Thompson a Contested Case Hearing

From Sue Tamon <tamonx2@yahoo.com>

Date Thu 6/25/2026 8:41 PM

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

Aloha Chair Kanaka'ole and Members of the Board of Land and Natural Resources. My name is Greg Tamon. I oppose Item J-5 -- DOBOR's request to deny Kate Thompson a Contested Case Hearing (CCH). I ask the Board to reject that request and grant the hearing.

2. 9,323 vehicles towed, only 34 citations issued at Ala Wai Small Boat Harbor -- a 99.64% tow rate. (source: government records, 2022-2025; see K. Thompson testimony)
3. DOBOR's plan for the new LPR camera car: "warning, warning, tow." No fine. No citation. The LPR vehicle should enforce parking like the Enterprise Services contract with ProPark at the Honolulu Zoo: "ticket, ticket, tow."
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5. DOBOR says it cannot issue fines because it lacks the HARs -- yet it has never created them and the Board has never directed it to. The Legislature told them to fix it (SCR 58, 2026). Still no action.
6. DLNR should not tell the Legislature DOCARE issues citations at state harbors -- then average only 9 DOCARE tickets per year at Ala Wai Small Boat Harbor, fail to staff the harbor with DOCARE officers, and create an enforcement vacuum that led to more than 2,000 vehicles per year being towed. (source: government records, 2022-2025; see K. Thompson testimony)
7. Under Act 163 (2022), the Board retains the power to Amend the parking contract and could require a citation step before any tow. It never has. No one has explained why -- on the formal legal record.
8. A CCH is exactly how the public gets those answers -- under oath, on the record, with the Attorney General able to weigh in. Please grant Kate Thompson's petition.
9. Kate Thompson's formal analysis of DOBOR's denial recommendation identifies 12 specific failures -- including a misquoted statute, ignored Hawaii Supreme Court precedent (Sierra Club

v. BLNR, 2025), withheld citation data, and DOBOR's own in-house attorney testifying before the Legislature that only the Attorney General can determine whether a law is needed to reinstate a citation step in sub- contracted parking management concessions. There seems to be no valid basis to deny this hearing, and I hope the Board sees this as an opportunity to formally define the law and set a fair enforcement standard for the future. (see K. Thompson testimony).