

From: [PRESTON MURRAY](#)
To: [Kariya-Ramos, Suzanne M](#)
Subject: [EXTERNAL] Testimony in Support of SCAP Approval for the Kapa'a Bridge Project Aloha Commissioners,
Date: Thursday, January 15, 2026 12:38:08 PM

Aloha Commissioners,

I am submitting testimony in support of Areté Collective and their development plans as it relates to the Stream Channel Alteration Permit for the Kapa'a Bridge project.

As an employee, I have found Areté Collective to be proactive, responsive, and a good faith partner in supporting sustainable development. From taking care of the golf courses and surrounding areas, to proactively hiring the Hawaii Marine Animal Rescue, to regularly monitoring by AECOS, and providing onsite wildlife education for staff and contractors, Areté has demonstrated a commitment to protecting the environment and natural and cultural resources in the larger development area.

Furthermore, Areté has validated its pledge to engage meaningfully with the community. They have listened to concerns and adjusted the project, including increasing setbacks, reducing the project footprint, and increasing the amount of native plants throughout the entire project.

For these reasons, I respectfully request that the Commission approve the Stream Channel Alteration Permit.

Mahalo,

Donald P. Murray

Donald P Murray

1/15/2026

Re: Agenda # B1

Subject: Testimony in Support of SCAP Approval for the Kapa'a Bridge Project

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Furthermore, Areté has validated its pledge to engage meaningfully with the community. They have listened to concerns and adjusted, including increasing setbacks, reducing the project footprint, and increasing the amount of native plants throughout the entire project.

For these reasons, I respectfully request that the Commission approve the Stream Channel Alteration Permit.

Mahalo,

Printed Name: Ian Hunt


Signature: 

Date: 1/15/2026

From: [Steven Morse](#)
To: [Kariya-Ramos, Suzanne M](#)
Subject: [EXTERNAL] Letter of Support_Employees
Date: Thursday, January 15, 2026 8:20:54 PM
Attachments: [Letter of Support_Employees.pdf](#)

Please accept this email as support for the attached letter. i understand you will take this in lieu of a hard copy.

Mahalo,
Steven Morse

 Haleiwa, HI 96712

Re: Agenda # B1

Subject: Testimony in Support of SCAP Approval for the Kapa'a Bridge Project

Aloha Commissioners,

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As an employee, I have found Areté Collective to be proactive, responsive, and a good partner in supporting sustainable development. From taking care of the golf courses, to proactively hiring the Hawaii Marine Animal Rescue to regularly monitoring by AECOS, and providing onsite wildlife education for staff and contractors, Areté has demonstrated a commitment to protecting the environment and natural and cultural resources in the larger development area.

Furthermore, Areté has validated its pledge to engage meaningfully with the community. They have listened to concerns and adjusted, including increasing setbacks, reducing the project footprint, and increasing the amount of native plants throughout the entire project.

For these reasons, I respectfully request that the Commission approve the Stream Channel Alteration Permit.

Mahalo,

Printed Name: _____

Signature: _____

Date: _____

FROM THE DESK OF

Ka'ōiwi Kurosu

January 15, 2026

Members of the Commission

Subject: Testimony in Support of SCAP Approval for the Kapa'a Bridge Project

Dear Members of the Commission,

My name is Ka'ōiwi McKenzie-Kurosu and as a cultural and lineal descendant of this area with a Kuleana parcel still existing along the projects coastline, I am humbly writing in support of Areté Collective for the approval of their Stream Channel Alteration Permit for the Kapa'a Bridge project.

Areté Collective has continued to demonstrate its commitment to responsible development while validating its pledge to engage meaningfully with the community. They have heard our concerns and made adjustments to include increasing setbacks, reducing the projects footprint, and increasing the number of native plants and trees throughout the entire project. They are improving access to the shoreline, removing invasive ironwood trees that have proved to cause significant erosion, and planted native grasses, shrubs and trees throughout the golf course as well as along the coast. They have also demonstrated a commitment to protecting the environment of natural and cultural resources across much of the development area as well as continuing to honor my Ohana's kuleana parcel with so much aloha.

Based on the documentation provided and the studies completed, the application meets all three required components of the Ka Pa'akai framework. There are no traditional Native Hawaiian practices occurring within the area identified, and I have witnessed the conditions of this man-made drainage to have a grassy-sandy floor with no flowing water and no signs of O'pae or O'opu living in this area.

For these reasons, and most importantly because the project is identical in scope and design to the application that the Commission unanimously approved in 2022, I whole heartedly support approval of Areté Collective's Stream Channel permit application for the Kapa'a Bridge project.

Sincerely yours,

Ka'ōiwi McKenzie-Kurosu

Kuleana owner

Subject: Agenda B1, Support of SCAP Approval for the Kapa'a Bridge Project

Dear Members of the Commission,

As a former member of Turtle Bay's Cultural Advisory Committee, I respectfully submit testimony in support of Areté's Collective and their resubmittal of their Stream Channel Alteration Permit to build a bridge over the East Main Drain.

The Cultural Advisory Committee was formed in 2021 by then-owner Blackstone and included both Hawaiian and non-Hawaiian members representing a cross-section of the community. We met regularly for three years until the hotel changed ownership and the committee concluded in 2024.

Because there has been some misunderstanding about the CAC's involvement, I would like to note that Becky and Joey Buchan of Areté Collective invited me for a tour of the area to share their vision and plans. And even after the committee dissolved, Areté continued meeting individually with members to seek cultural guidance.

I also acknowledge that the vision of Turtle Bay has been shaped by decades of studies, reviews, and community consultation including outreach to more than 300 individuals and agencies, a 2024 open house with 250+ attendees, Neighborhood Board presentations, and numerous one-on-one conversations.

Areté Collective has demonstrated its commitment to responsible development and has validated its pledge to engage meaningfully with the community. They are increasing setbacks, reducing the project footprint, improving access to the shoreline, removing invasive ironwood trees, and planting native plants along the coastline and throughout the golf course.

For these reasons and more which are underscored by the knowledge that the East Main Drain is an engineered waterway to support drainage with no traditional or customary practices within the culvert area, I urge the Commission to support this permit application, which is the same project approved by the Commission in 2022.

Mahalo nui,

Mahina Chillingworth



ADDENDUM TO OFFICIAL TESTIMONY OF KŪPA'A KUILIMA

January 17, 2026

Before the Commission on Water Resource Management (CWRM)

RE: SCAP.6438.3 – Wasatch Areté TB Holdings

Proposed Stream Channel Alteration Permit for a Concrete Culvert Across 'Ō'io Stream, Kahuku

Aloha Chair Kanaka'ole and Honorable Commissioners,

This addendum is submitted to supplement Kūpa'a Kuilima's official testimony dated November 29, 2025. It provides additional information relevant to the Commission's consideration of SCAP.6438.3, including newly documented native wildlife impacts and clarification of unresolved regulatory and safety concerns directly enabled by the proposed culvert.

This addendum incorporates and relies upon a written correspondence dated January 13, 2026, from Linda Elliott, President and Center Director of the Hawai'i Wildlife Center, addressed to the U.S. Fish and Wildlife Service and the Hawai'i Department of Land and Natural Resources, Division of Forestry and Wildlife. This correspondence is attached in its entirety as Exhibit A and is incorporated herein by reference.

I. Absence of an Incidental Take License (ITL) and Habitat Conservation Plan (HCP)

There is currently no approved Incidental Take License (ITL) and no Habitat Conservation Plan (HCP) in place for the Turtle Bay property or the broader development that this proposed culvert is intended to serve.

The 'Ō'io Stream area and surrounding landscape provide habitat for multiple protected native species, including seabirds and the endangered Hawaiian gallinule ('ālae 'ula), as well as the Hawaiian coot ('ālae ke'oke'o), Hawaiian stilt (ae'o), and Hawaiian duck (koloa maoli), all of which utilize freshwater, wetland, and stream-associated habitats in the area. Stream channel alteration, roadway construction, increased lighting, expanded vehicle access, and higher traffic volumes substantially increase the likelihood of incidental take. Without an ITL and HCP, there is no legally enforceable framework identifying anticipated take, avoidance and minimization measures, mitigation commitments, monitoring requirements, or adaptive management obligations.

Approval of a stream channel alteration that facilitates development-related access and infrastructure, in the absence of these required protections, would expose native species to increased risk while leaving the State without enforceable safeguards or accountability mechanisms.

II. Culvert as Enabling Infrastructure for Increased Traffic and Speed

The proposed culvert is not a standalone project. Its function is to support roadway connectivity and future development. Approval of the culvert will directly enable:

- Increased vehicle traffic volume associated with new roads and expanded access;
- Higher vehicle speeds resulting from roadway design and alignment;
- Increased likelihood of wildlife-vehicle collisions, particularly for ground-dwelling and wetland-dependent species.

These impacts are not speculative. Traffic volume and speed increases are foreseeable consequences of roadway expansion and must be evaluated as part of the cumulative impacts of the project. No such analysis has been provided to the Commission. Traffic impacts in this context are directly tied to public safety, wildlife



protection, and resource stewardship and therefore fall squarely within the Commission's public trust considerations.

III. Documented Native Bird Injury and Mortality at Turtle Bay (Exhibit A)

As documented in the Hawai'i Wildlife Center correspondence attached as Exhibit A, native bird injury and mortality at Turtle Bay is not hypothetical, it is ongoing.

The correspondence details, among other things:

- Years of seabird fallout data (2013–2025) demonstrating significant impacts in the Turtle Bay–Kahuku region, with acknowledgment that available records likely underrepresent actual take due to unreported or mishandled incidents;
- Multiple public reports of shearwaters colliding with illuminated resort structures, including glass doors and pool facilities, resulting in injury and death;
- Confirmed instances of deceased shearwaters found on resort beaches and property, reported to state and federal agencies;
- A documented incident involving an endangered Hawaiian gallinule struck by a golf ball, left without timely intervention and later found dead;
- Repeated delays, non-responses, and incomplete coordination between the resort, developers, and wildlife professionals despite years of outreach;
- The continued absence of a finalized, transparent, and coordinated wildlife response protocol with enforceable agreements and clear procedures for handling injured or deceased native species.

These documented incidents underscore the real and ongoing risks to protected species at the project site. Expansion of infrastructure, lighting, traffic, and increased human activity, without an ITL, HCP, or enforceable wildlife response plan, will predictably increase these impacts.

IV. Relevance to the Commission's Public Trust Obligations

The Commission cannot responsibly evaluate the proposed Stream Channel Alteration Permit without considering the cumulative impacts enabled by the culvert. The absence of an ITL and HCP, the documented record of native wildlife injury and mortality, and the foreseeable increase in traffic volume and vehicle speeds collectively represent significant unresolved issues.

Approving SCAP.6438.3 under these conditions would undermine the Commission's duty to protect Hawai'i's water resources, native species, and public safety for present and future generations.

V. Request

In addition to the requests listed in our November 29th 2025 testimony, Kūpa'a Kuilima respectfully requests that the Commission deny, or, at least, continue to defer action on SCAP.6438.3 until:

- An Incidental Take License and Habitat Conservation Plan are completed, approved, and publicly reviewed;
- Traffic volume, speed, and safety impacts enabled by the culvert and associated roadway are fully disclosed and analyzed;
- Wildlife response protocols are finalized, enforceable, and coordinated with appropriate state and federal agencies;
- The cumulative impacts of the culvert as enabling infrastructure are properly evaluated.



Mahalo nui for your careful consideration of this supplemental information and for your continued commitment to upholding the public trust.

Kūpa'a Kuilima
Jessica dos Santos
Lillie Makaila
Melissa Ka'onohi-Camit
Ramsey Calimlim

EXHIBIT A

Correspondence Regarding Native Bird Incidents at Turtle Bay

From:

Linda Elliott
President & Center Director
Hawai'i Wildlife Center

To:

U.S. Fish and Wildlife Service
Hawai'i Department of Land and Natural Resources
Division of Forestry and Wildlife (DOFAW)

Re:

Native Bird Injury and Mortality Incidents at Turtle Bay Resort, Kahuku

Date:

January 13, 2026

Attached to:

Addendum to Official Testimony of Kūpa'a Kuilima
Before the Commission on Water Resource Management (CWRM)
RE: SCAP.6438.3 – Wasatch Areté TB Holdings
Proposed Stream Channel Alteration Permit for a Concrete Culvert Across 'Ō'io Stream



Subject: [EXTERNAL] Turtle Bay native bird incidents



Linda Elliott <[REDACTED]@hawaiiwildlifecenter.org>



Tue, Jan 13, 4:46 PM (2 days ago)

Per your request here is some info on the incidents and communications we have had that I can track down for the last year regarding the Turtle Bay property and native wildlife incidents and concerns.

Jan 30, 2025 we provided [REDACTED] data on downed seabirds at Turtle Bay included all birds from Hale'iwa to Kualoa Ranch 2013-2025. It shows significant seabird fallout in that area. We also noted that we have gotten reports that they have released birds on their own or there have been ones that have been reported but then "disappeared" or "flew away" (possibly released by someone), which no longer needed a pick up. So the birds we have in our records don't show the full picture. Also, it's very possible that Feather and Fur has received birds from that location that died and didn't make it to us/into our records.

On July 22, 2025 a guest at the Ritz Carlton Turtle Bay contacted us reporting "In the span of less than 30 minutes starting at approximately 9pm we saw about 15 of the albatross (caller called them albatross but we're thinking they were shearwaters) crash into the lighted pool or the Sunset Bar hut that was brightly lit. The ones that crashed into the glass doors of the bar hit very hard. The staff seemed to say it was a common occurrence and just moved them to the bushes. Some appeared to be quite injured." "I'd say we saw likely 20 injured (shearwaters) in a very short time period. They tend to get placed by the workers in the bushes to the left of the sandbar hut (as you face the ocean)." We gave the reporter the wildlife agencies contacts and we forwarded the information our selves to [REDACTED], [REDACTED] and [REDACTED] as well.



On September 7, 2025 a public person by the name of [REDACTED] sent pictures of 4 dead shearwaters by Turtle Bay on the beach with a GPS point. That was shared with DOFAW— [REDACTED] and [REDACTED]. And also with [REDACTED].

On Oct. 13, 2025 We were included in an email from [REDACTED] to [REDACTED] of Turtle Bay Resort/ Host Hotels. The introduction per [REDACTED] was so "we can coordinate better for any birds that may fallout this year at Turtle Bay Resort during the fall out period" "[REDACTED] it would be great if you can connect with [REDACTED] to work out how TBR can ensure proper care and assessment is provided by HWC if birds are found on property.". I followed up with a reply to the email on October 14th, 2025 and let her know we are looking forward to setting up an efficient process to get downed, sick/injured or orphaned native birds from the Turtle Bay Resort to rehabilitative care at Hawai'i Wildlife Center, both for fallout and for any native birds throughout the year and I asked for a phone meeting. No Response received from [REDACTED]

On October. 28, 2025 I sent another email request to [REDACTED] and [REDACTED] and [REDACTED] replied: "[REDACTED] just finished up her response protocol so hopefully, you folks can work together to make sure birds are getting the best care without delays." No response from [REDACTED]

On Oct. 31, 2025 [REDACTED] replied. "Thanks again for reaching out. We are very close to finalizing our fallout plan which [REDACTED] has reviewed and provided feedback. I have cc'd our Director of Security from



The Ritz Carlton Turtle Bay, [REDACTED] who will be the contact if there are any downed birds on the property in the future. He now has your contact for any questions he might have.” We have yet to receive that fallout plan as of 1/13/26.

On Nov. 19, 2025 we received a call from a golfer/public person, [REDACTED] reporting a gallinule that was hit by a golf ball and was alive and struggling, was told to capture and report it to the golf staff and it needed to be transported to Feather and Fur ASAP. After no response and a long delay our team followed up and were told the gallinule had been left and was later found dead.

On Dec. 3, 2025 I mentioned in an email to [REDACTED] we have not yet heard anything from Turtle Bay. On Dec. 4 2025, [REDACTED] said she was reaching out to Turtle Bay and Arete. And asked for our data from fallout in that area when we can get to it.

On Dec. 16 2025 [REDACTED] sent a list of golf course maintenance staff and their emails but no contact phone #s or what the SOP is for injured, orphaned, downed or dead native birds and how we are going to coordinate with them.

On Jan. 2, 2026 I replied to [REDACTED] list of golf maintenance guys with a request for how HWC fits in to their response plan and in what capacity are we are included. I also sent a sample service agreement similar to what other resorts or utilities have done. I have not heard back from [REDACTED] or anyone else.

Jan. 6, 2026, We received pictures of signage on the Fazio, Turtle Bay Golf course and also that our info was shared in a presentation to a community conservation group she was attending from [REDACTED] We had not been contacted by the Resort on the use of our info or how this works with any SOP they may have.



Today, Jan 13, 2026, [REDACTED] called around 12:30PM said the staff found a dead gallinule this morning on the Palmer Course, hole #6. I called and left messages for [REDACTED] and then called [REDACTED] and [REDACTED] to see if anyone knows the SOP that Turtle Bay Resort supposedly developed on dead endangered species on their property. We also gave [REDACTED] info on how to collect the carcass and store it until [REDACTED] could arrange to have it picked up and taken to [REDACTED]. [REDACTED] returned my call late afternoon and we reviewed the information we had and what is the possible next steps. It seems the carcass was left outside for hours before they contacted us and at that time [REDACTED] asked for it to be collected, not the best policy if there is to be a necropsy.

A lot of time was spent on these responses to native wildlife that would have been more efficiently handled and better for the birds if there is an actual response plan with agreements in place with all relevant parties.

Hope this is helpful in moving wildlife response forward for the native wildlife and in partnership with the resort and developers.

Aloha,
Linda

Linda Elliott

2/3

[REDACTED]

[REDACTED]

President & Center Director
HAWAI'I WILDLIFE CENTER
PO Box 551752
Kapa'au, HI 96755
(808) 884-5000 Office

E pūlama i nā manu Hawai'i
Cherish the birds of Hawai'i





FOR YOUR REFERENCE:

OFFICIAL TESTIMONY OF KŪPA'A KUILIMA

November 29th, 2025

Before the Commission on Water Resource Management (CWRM)

RE: SCAP.6438.3 - Wasatch Areté TB Holdings

Proposed Stream Channel Alteration Permit for a New Concrete Culvert Across 'Ō'io Stream, Kahuku

Aloha Chair Chang and Honorable Commissioners,

Kūpa'a Kuilima submits this testimony in strong opposition to approving Stream Channel Alteration Permit SCAP.6438.3. The Commission's decision to defer the permit at the November meeting was both appropriate and necessary, and we mahalo you for recognizing many of the same concerns that our community has been raising. This project simply cannot be evaluated responsibly without a complete Ka Pa'akai Framework Analysis, updated environmental and hydrologic data, and a transparent explanation of the broader development this culvert is intended to support.

Below, we highlight the major deficiencies that must be addressed before the Commission can lawfully or ethically consider approval.

I. Ka Pa'akai Framework Analysis Has Not Been Completed

The Ka Pa'akai Framework Analysis for this project has not yet been completed. The existing Cultural Impact Assessment (2012) and SEIS (2013) were improperly accepted by the Department of Planning and Permitting in 2022 as fulfilling Ka Pa'akai. The current DPP Director has chosen not to revisit or overturn that determination, leaving the department open to legal challenge. Regardless of the DPP's position, this Commission has its own legal obligation to determine whether the documents provided by the applicant meet the threshold of fulfilling Ka Pa'akai Framework Analysis.

To date, the applicant has not been able to identify which document, or combination of documents, fulfills Ka Pa'akai. If they are referring to the CIA (2012) and SEIS (2013), then these two documents clearly do not meet the three-part framework. These documents fail to adequately answer the three core questions required under Ka Pa'akai:

- 1) What traditional and customary Native Hawaiian rights and practices exist in the vicinity of the proposed action?
- 2) What impacts would the proposed action have on those practices? And,
- 3) How does the applicant intend to mitigate those impacts?

At the November 2025 meeting, Areté representatives seemed to imply that the Turtle Bay Cultural Advisory Committee was consulted as a part of Ka Pa'akai for this project. But that committee did not exist until 2021 and was disbanded in 2025. If the CIA is supposed to be the document demonstrating Ka Pa'akai compliance, that committee did not exist during the supposed consultation process.

Additionally, proper consultation under the Ka Pa'akai Framework requires far more than the applicant has shown. It includes signed disclosures of consent from consultees, transcripts of interviews, opportunities for practitioners to review and correct those transcripts, and ultimately, the publication of a complete report. None



of this has been provided to the Commission. The applicant has not produced evidence demonstrating that they completed these steps.

Substantively, the existing CIA (2012) and SEIS (2013) also do not satisfy Ka Pa'akai, firstly because it does not answer the three-part framework for analysis mentioned above. And additionally, much of the consultation in the CIA (2012) relied on paid employees of the then-developer, which undermines the validity of the process.

As people of this place, we know who the cultural practitioners are who should be consulted. There are today native practitioners who engage in hula, limu picking, shoreline and subsistence fishing, including casting, throw net, lay net, and diving, lei making, gathering coastal resources such as pa'akai, collecting lā'au lapa'au, and recreate, 'au'au kai in these places. These practices will be directly affected by alterations to 'Ō'io Stream. If Areté had completed a Ka Pa'akai Framework Analysis, then their project team should be able to show evidence of the completed analysis. At the very least they should be able to clearly explain how each of these practices may be impacted and what measures they intend to take to mitigate those impacts. Based on the responses given by the Areté team at the November 2025 CWRM meeting, it appears they are unable to provide this information and that is because an adequate Ka Pa'akai Framework Analysis has not been completed.

II. Outdated Flood and Sea Level Rise Modeling

In a meeting with the Honolulu Department of Planning and Permitting, the flood risk modeling presented by the applicant in the SEIS (2013) was reviewed by subject-matter experts from the University of Hawai'i and found to be inadequate. As highlighted in the report prepared by Dr. Haunani Kāne and Sara Kahanamoku-Meyer, the analysis failed to incorporate potential **groundwater flooding**, one of the most critical and well-documented drivers of backshore inundation. Instead, the applicant relied on a minimal scenario that does not represent present or projected flood risk. This incomplete assessment leaves significant gaps in understanding how flooding may impact 'Ō'io Stream, surrounding ecosystems, and nearby communities. This analysis is publicly viewable here:

https://drive.google.com/file/d/1h_zV_a6_bxf0zUN6BA9liwq4-CM3ZrUc/view?usp=sharing

Climate change has already intensified flooding events across Hawai'i. Without comprehensive and current flood risk modeling—including groundwater emergence, passive flooding, and sea level rise dynamics—any culvert, stream crossing, or channel alteration risks increasing flooding, erosion, and damage to both ecosystems and community infrastructure.

Compounding these deficiencies, the flood and sea level rise analysis submitted by the applicant does **not incorporate the most recent State of Hawai'i—endorsed modeling updates**, including the **2025 passive flooding model release** and the updated guidance provided through the State's 2022 Hawai'i Sea Level Rise Vulnerability and Adaptation Report. These updated models—now required for State and County planning—include refined passive flooding layers, backshore inundation projections, and the Sea Level Rise Exposure Area (SLR-XA), all of which are directly relevant to the project area.

State guidance is explicit: planners and applicants must evaluate a minimum of **4 feet of sea level rise**, and up to **6 feet for low-tolerance-for-risk infrastructure**, such as culverts. NOAA's updated 4–8 foot passive flooding scenarios, PacIOOS layers, and revised SLR-XA projections were released in support of these requirements.

However, the applicant's analysis relies instead on **older "low" and "intermediate-low" scenarios** that UH researchers have already deemed obsolete. By failing to incorporate the newly released 2025 data, the applicant's modeling does not reflect current exposure conditions, projected flooding pathways, or the State's



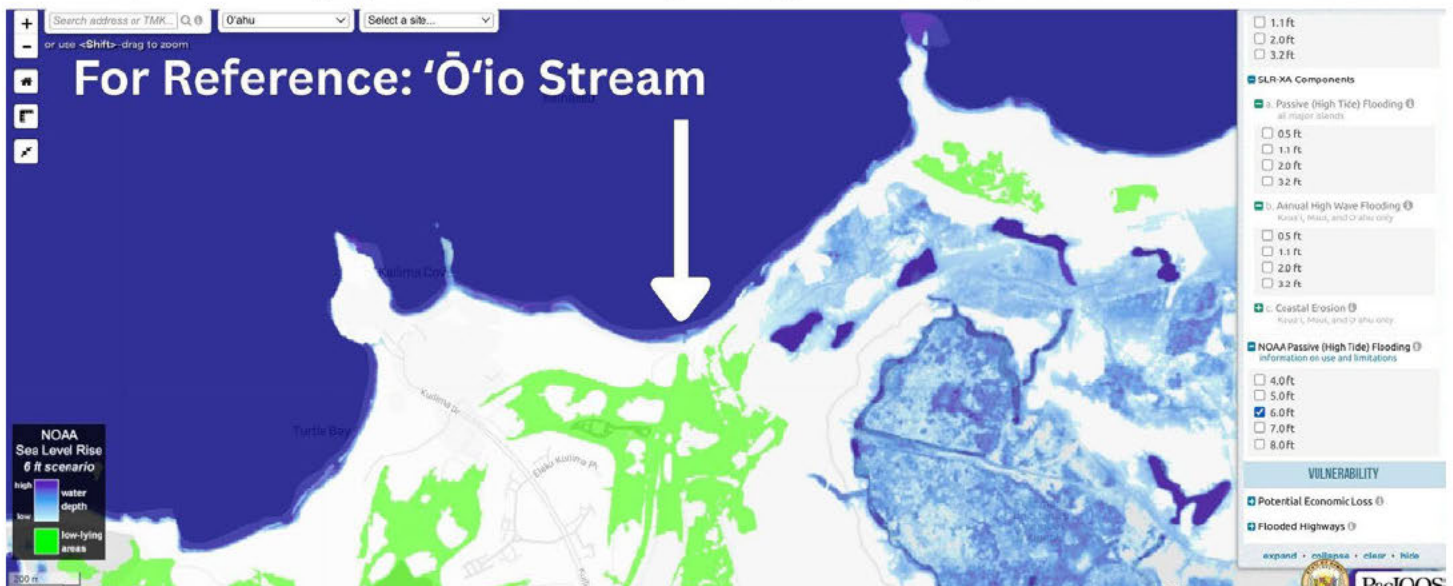
required planning thresholds. As a result, the analysis cannot be considered aligned with best available science and cannot support responsible decision-making.

Given the accelerating pace of sea level rise and recent statewide updates to coastal hazard modeling, approving a culvert based on outdated or incomplete data would expose both the Commission and the public to unnecessary and preventable risk.



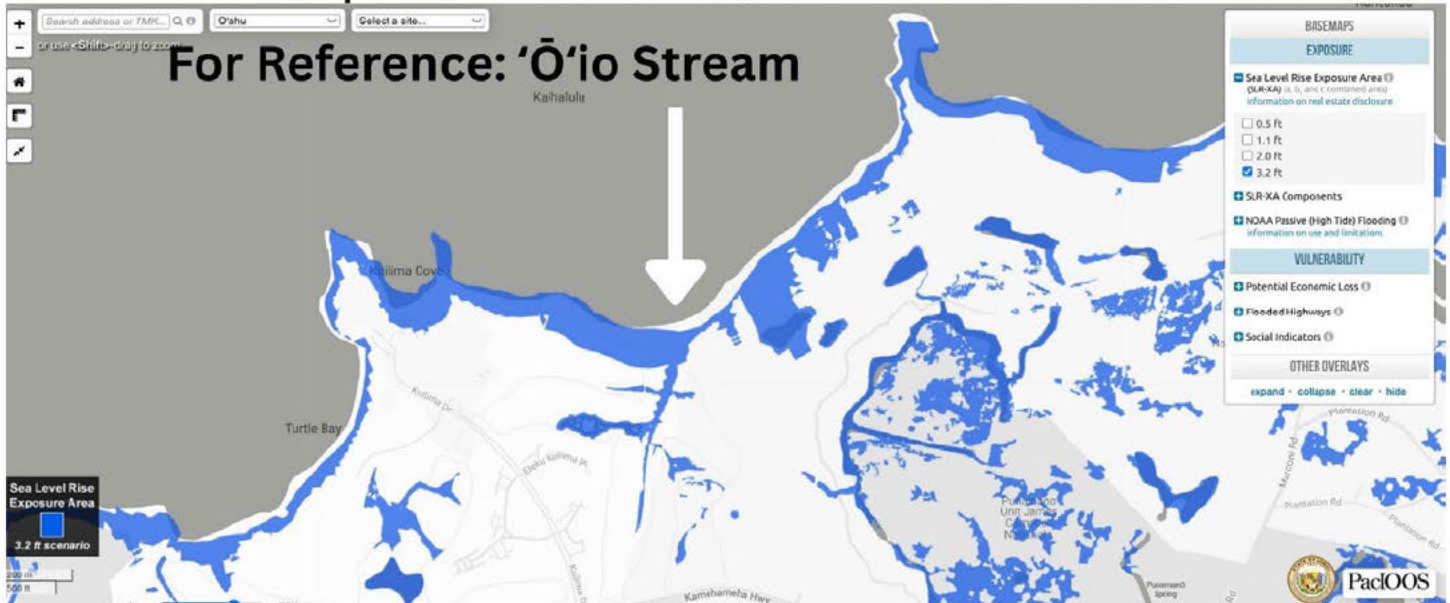
Passive High Tide Flooding at 6 Feet

NOAA passive flooding layers from 4–8 ft — showing what high-tide flooding could look like in future conditions

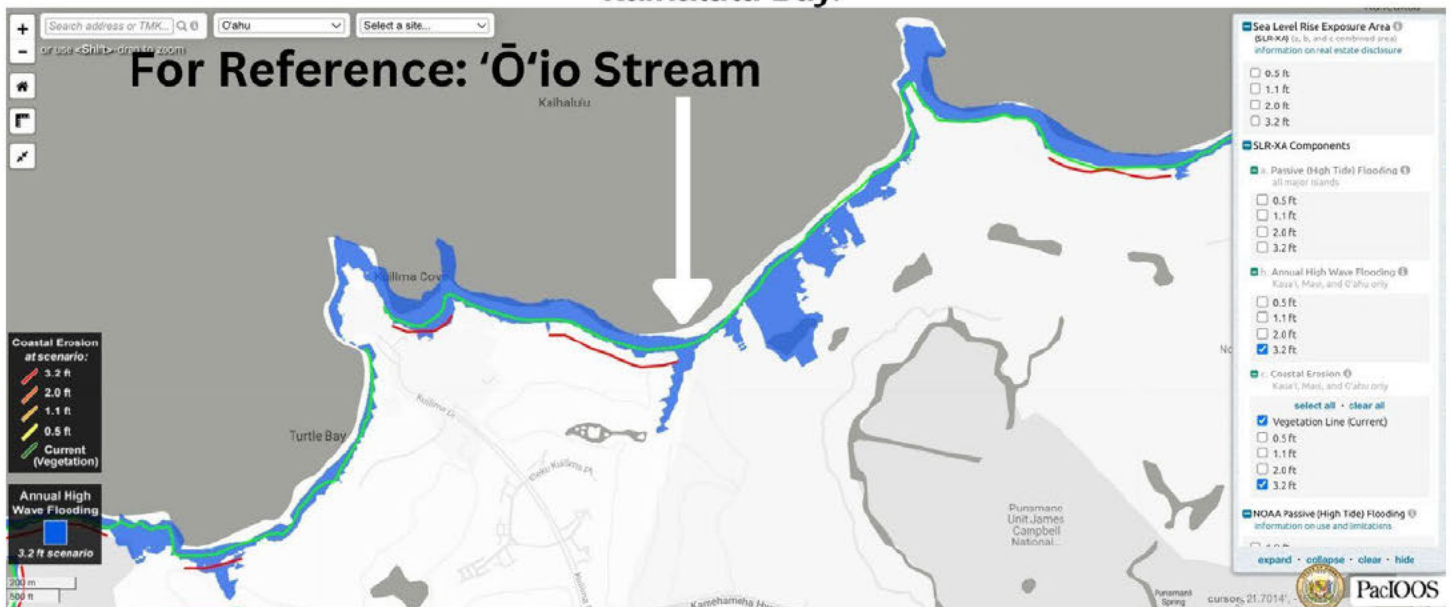




Sea Level Rise Exposure Area at 3.2 Feet (under the 4 feet minimum scenario)



Annual High Wave Flooding at 3.2 Feet (under the 4 feet minimum scenario) at Kāhala Bay.



III. No Explanation of the Larger Development Plan

Throughout the November 2025 meeting, Commissioners repeatedly asked the applicant to explain what broader project the culvert is intended to serve. The applicant was unable to provide an adequate answer. A culvert is not a standalone structure; it is part of a larger development plan involving roadways, buildout, and alterations to hydrology and shoreline processes. CWRM cannot properly evaluate a single component of a



larger project when the larger project has not been adequately disclosed, which would be considered segmentation.



IV. Public Trust Responsibilities and Agency Precedent

Approving a permit based on decade-old documents and outdated science would set a dangerous precedent. Such action would undermine the Public Trust Doctrine, weaken protections for Native Hawaiian rights under Article XII, Section 7, and erode public confidence in CWRM's ability to steward Hawai'i's water resources responsibly. The Commission's duty is to present and future generations. An incomplete and outdated record cannot satisfy that duty. Legally, the Commission should demand that the applicant provide updated supplemental technical studies and environmental disclosure documents in order to make an informed decision and fulfill the intent of the law.

VI. Request

For these reasons, Kūpa'a Kuilima respectfully urges the Commission to require a complete and updated Ka Pa'akai Framework Analysis, including independent cultural consultation, identification of traditional and customary practices, analysis of impacts, and proposed mitigation supported by documentation and interview transcripts. We also request that the Commission require updated hydrologic, flood, and sea level rise modeling that incorporates groundwater inundation, the SLR-XA, NOAA's 4–8 ft scenarios, and cumulative watershed impacts, consistent with the State's 2022 and 2025 guidance. Finally, we ask that the Commission continue to defer this permit until all the above required information is provided and reviewed.

Conclusion



‘Ō‘io Stream is a living cultural and ecological resource. The decisions made here will shape the health of the stream, the shoreline, and the surrounding community for generations. The applicant has not met the legal, scientific, or cultural thresholds necessary for approval. We urge the Commission to maintain its stance and defer action until the required analyses and studies are properly completed. Mahalo nui for your time, diligence, and commitment to the protection of Hawai‘i’s water resources and cultural heritage.

Kūpa‘a Kuilima

Jessica dos Santos

Lillie Makaila

Melissa Ka’onohipi-Camit

Ramsey Calimlim

Ida Kawaihani Bluhm

TESTIMONY OF JESSICA DOS SANTOS

Before the Commission on Water Resource Management (CWRM)

RE: SCAP.6438.3 – Wasatch Areté TB Holdings

Proposed Stream Channel Alteration Permit for a Concrete Culvert Across ‘Ō‘io Stream, Kahuku

Aloha Chair Kanaka‘ole and Honorable Commissioners,

My name is Jessica dos Santos. I submit this testimony as a private citizen, long-time Kahuku community member, and former President of the Kahuku Community Association. I am also a former member of the Turtle Bay Cultural Advisory Committee (CAC), on which I served from its inception in 2021 until my resignation in January 2025. I offer this testimony to provide factual clarification regarding the applicant’s claims of consultation and to urge the Commission to deny, or continue deferring, Stream Channel Alteration Permit SCAP.6438.3 due to serious legal, cultural, and scientific deficiencies.

I was asked to serve on the Cultural Advisory Committee because of my leadership role within the Kahuku community and with the understanding that I had a responsibility to report back to the community on matters that could affect them. Throughout my time on the committee, I repeatedly asked direct questions about whether development beyond the existing hotel operations was being planned and whether permits were being pursued. These questions were asked specifically because of the potential impacts to our community and our ‘āina. Those details were not shared.

In 2022, when determinations that would later enable the Areté development were requested and approved, that information was not disclosed to the Cultural Advisory Committee. There was one meeting in which Tom Donovan of Turtle Bay referenced a possible interest by the prior landowners in developing areas referred to as H1, H2, and RR3. However, we were told at that time that no decisions had been made and that development might not proceed because of economic uncertainty. At no point was the committee informed that development would definitively move forward, nor were we consulted on any specific plans, impacts, or mitigation measures related to such development nor any related stream alterations.

The bulk of the committee’s work focused on providing feedback related to existing resort operations, such as an interpretive cultural gallery, a paniolo-themed lū‘au, and guided cultural tours. Even within that limited scope, recommendations from committee members were often not meaningfully incorporated if at all, leaving several of us questioning the purpose and sincerity of the process.

On May 28th, 2024, the Cultural Advisory Committee received an email late at night, just hours before a May 29th, 2024 public press release announced the sale of the land to two new owners. In a subsequent meeting with one of those new owners, Areté, we were informed that development would proceed. Shortly thereafter, the Cultural Advisory Committee was dissolved. Based on my direct experience, I can state clearly and confidently that the committee was never consulted on the Areté development of condos (RR3), nor any hotel development (H1 and H2), nor any stream alteration plans, nor were we informed in a timely or transparent manner that such development was definitively moving forward.

For these reasons, any assertion by the applicant that the Cultural Advisory Committee was consulted as part of stakeholder outreach or as a component of a Ka Pa‘akai Framework

Analysis is inaccurate and misleading. Characterizing the CAC as having been consulted on this development is a false representation of what actually occurred.

This lack of genuine consultation is directly reflected in the broader deficiencies before the Commission today. The Ka Pa'akai Framework Analysis for this project has not been adequately completed. The applicant has not identified any document that satisfies the three required components of Ka Pa'akai: identification of traditional and customary Native Hawaiian practices in the area, analysis of how those practices will be impacted, and specific mitigation measures to address those impacts. The Cultural Impact Assessment from 2012 and the Supplemental Environmental Impact Statement from 2013 do not meet this standard. Moreover, the CAC did not exist at the time those documents were prepared, further underscoring that they cannot credibly be used to demonstrate compliance with Ka Pa'akai.

As someone from this place, I know, and the applicant should know, that 'Ō'io Stream, and its surrounding/connected shorelines, are either actively used, or has the potential to be used, by Native Hawaiian practitioners today for fishing, limu gathering, pa'akai collection, lā'au lapa'au, other subsistence practices, and shoreline recreation. Altering the stream with a concrete culvert will directly affect these practices. Yet this applicant has provided no evidence of proper consultation with practitioners, no documentation of interviews or consent beyond the insufficient 2013 SEIS Cultural Impact Statement for the overall development plans, and no clear explanation of how impacts will be mitigated.

In addition to these cultural failures, the technical analyses supporting this permit are outdated and inadequate. Flood and sea level rise modeling relied upon by the applicant is more than a decade old and has been reviewed by University of Hawai'i experts who found it deficient, particularly for failing to account for groundwater flooding. The analysis does not incorporate the State of Hawai'i's most recent guidance, including the 2022 Hawai'i Sea Level Rise Vulnerability and Adaptation Report and the updated 2025 passive flooding models. These models require evaluation of at least four feet of sea level rise, and more for infrastructure such as culverts. Proceeding with a permit based on obsolete scenarios does not reflect best available science and places both the community and the Commission at risk.

The Commission has a constitutional and public trust duty to protect Hawai'i's water resources and Native Hawaiian rights for present and future generations. Approving a permit based on incomplete cultural analysis, outdated science, and misleading claims of consultation would set a dangerous precedent and undermine public confidence in the Commission's role as a steward of these resources.



For all of these reasons, I respectfully urge the Commission to deny or continue deferring action on SCAP.6438.3 and to require the applicant to complete a lawful and transparent Ka Pa'akai Framework Analysis, conduct genuine cultural consultation, provide updated hydrologic and sea level rise modeling consistent with current State guidance.


Mahalo nui for your careful consideration and for upholding your responsibility to protect 'Ō'io Stream, our community, and the public trust.


Respectfully submitted,



Jessica dos Santos

Community Testimony RE: SCAP 6438.3


Karen Phillips		I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.	The cultural integrity is important to both the indigenous people of Hawaii and for tourism. If the island culture is overruled by corporate greed without thought to the native interests of the people, then the beauty and attraction of Hawaii will forever be lost.	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.
Christine Tarski		I live in a nearby community., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices., Other: Short	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding,	1). The impact of the development is based on old out-of-date studies. 2). This area is home to many endangered wetland and sea birds that currently have a safe haven to live and breed. 3) the changes to the stream could have a life-threatening impact during island flooding,	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water

		answer	<p>which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>hurricane, and especially tsunami conditions, hindering or keeping people from evacuating. The entire north and east shores of Oahu have only Kamehameha Hwy to evacuate during emergencies. Being in the middle of the east/north shore area, changes could dramatically cause horrible consequences.</p>	Resource Management.
Karen Howes		<p>I live in a nearby community., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.</p>	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned</p>	<p>Please stop this unnecessary development that no one wants in our community.</p>	<p>I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.</p>


			that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.		
Patricia Waters		I live in Kahuku.	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>My son grew up walking this shoreline and walking along side this stream. We got to see it before construction began and while they have taken over. We have seen archeologist close to Queen's Bath or Keiki Pool before construction happened and this really lit my son up. He is almost 7 and was maybe 4 at the time. He was really into dinosaurs at the time so of course we spoke to them. They told us that they found native Hawaiian artifacts and knew they would find more but that they were not allowed enough time to do their work to prove their case that building could not commence on this site. We have walked by countless native Hawaiians fishing, relaxing, having 1 year old bday parties, doing hula, praying and more beautiful native Hawaiian practices on this shoreline, as they should have this right. I have seen grandfathers teaching their grandchildren how to fish here on both sides close to this stream. Thanks for hearing my</p>	<p>I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.</p>


				words. The ground they have cleared my son named, "Peaceful forest" - what do we teach our kids is important by our actions and our choices?	
Cindie Weltch		I care about protecting streams, ecosystems, and cultural practices.	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>The people who have graced this precious ground you seek to destroy, should be heard, seen and recognized. This land should not be developed in anyway that violates cultural history, nor the will of the people. Mahalo</p>	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.
Laura Zoller		I live in a nearby community., I work in or near Kahuku., I come to this area regularly., I care	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the</p>	<p>'Ō'io Stream Leave this water alone- our seals, turtles, and fish need the nutrients it provides to flourish. Consider all of the shoreline roadwork that has</p>	I authorize Kūpa'a Kuilima to include my name and testimony in

		about protecting streams, ecosystems, and cultural practices., Other: Short answer	existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.	been done from Kualoa towards Kahuku	the official submission to the Commission on Water Resource Management.
Jane Miller		I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and	I believe the community should be involved, and that such involvement should be prioritized. Residents deserve a voice in the future of their community. Species are becoming endangered and even disappearing from the earth at an ever increasing and alarming rate. As a vital coastal habitat to numerous endangered species, development at Kahuku Point will have significant impact. These sensitive areas must be respected and preserved.	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.

			<p>I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>The site also has sacred burial sites that must be respected.</p> <p>Traffic mitigation plans are essential here since more development will exacerbate already critical congestion and safety risks for both residents and visitors.</p> <p>There also needs to be serious consideration of affordable housing and the impact on the community. Being predominantly designed for a wealthier clientele, this development will promote gentrification to this unique rural and cultural community. Additionally, it will increase the strain on already overburdened emergency response, healthcare facilities, public education systems, and other necessary community resources, intensifying the challenges posed by a significant population increase. The cumulative impacts of adding 100 luxury resort residential units, 625 hotel and/or condotel units, over 500 employees, and the potential for approximately 3,000 people daily to the area must not be ignored.</p>	
Constance Lee DelaCruz		I live in Kahuku.	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully</p>	<p>I believe this project is being shoved ahead before community leaders have</p>	<p>I authorize Kūpa‘a Kuilima to</p>



			<p>describe the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not include mitigation measures for the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>been given proper respect, without community input and consideration. More information sharing and knowledge of land use needs to be addressed so that community leaders can discuss concerns and come to a mutual understanding of what is being done and it's impact on our community and long term goals for North Shore community development.</p>	<p>include my name and testimony in the official submission to the Commission on Water Resource Management.</p>
Elpidio Lucas DelaCruz		I live in Kahuku.	<p>I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability &</p>	<p>I would like more information and I would like to see more community input being considered on this project.</p>	<p>I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water</p>


			Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa‘a Kuilima, and I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.		Resource Management.
Kaylene Kauwila Sheldon		Myself and/or my ‘ohana are from Kahuku., Myself and/or my ‘ohana have been in Kahuku for generations., I live in a nearby community., I am a Native Hawaiian cultural practitioner., I am a lineal or cultural descendant with ancestral ties to the area., I work in or near Kahuku., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices., Other: Short	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa‘akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully list the extent of the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa‘akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully describe the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa‘akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not include mitigation measures for the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa‘akai Framework Analysis., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant’s modeling does not use the State	As Kū Kia’i Moana the stream needs to flow organically.	I authorize Kūpa‘a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.


		answer	<p>of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>		
Robert Graham		I live in a nearby community., I care about protecting streams, ecosystems, and cultural practices.	<p>I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>I have lived at Kuilima Estates East for almost 40 years and taught at Sunset Beach El School for 32 years until I retired in 2017, so O'io Stream is literally in my back yard and I have seen it flood over the golf course and into out grounds many times. One of the things that concerns me is that with the present development Arete does not reach out to the condo community with updates on their plans or information on how their construction will effect us. I am of course concerned about how the development will effect native birdlife and impact the fishermen and people who seek what was an undeveloped coast for a respite from their busy lives. I am also concerned that there is no timeline for the</p>	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.

				parks that were promised as part of the development, and how the development will affect the trails and public access. I also believe that the community housing that was part of the agreement should be made available before any more phases of development are begun.	
Vera Williams		I live in Kahuku., I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.	I believe that Arete Developement has not taken into account the damage to the environment that their project will cause, nor have they listened to the concerns of the people who live in the area.	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.
Calla		I live in a nearby	I oppose the Stream Channel Alteration Permit (SCAP.6438.3)	If we don't protect Turtle	I authorize


Camero		community., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.	<p>requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully list the extent of the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully describe the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not include mitigation measures for the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	Bay, iwi kūpuna and the endangered species habitat and Ko'olauloa then no one will. This is a matter of environmental protection, which to us is sacred. It's everything.	Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.
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Joshua Kaina		Myself and/or my 'ohana have been in Kahuku for generations.	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>As a child of fishermen, I have frequented the area near 'Ō'io stream and remember it to be one of the first places I have seen an Auku'u in the wild. Recently, many of our native birds are fighting to make a comeback in our moku. This area is a potential oasis once native practitioners, farmers and descendants are allowed to restore it. The land cries out for restoration and this is why I oppose. We cannot eat nor feed our future generations concrete and multi-million dollar homes. What we do need, our manu need and the land needs is healthy ecosystems and the protection of wai. Please oppose this desecration of a potential "breadbasket" and wahi pana that could one day feed your own families.</p>	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.
Matthew Mako		I live in Kahuku., Myself and/or my 'ohana are from Kahuku., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices., Other: Short	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully list the extent of the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully describe the potential impacts to the native rights and traditional and customary practices that take</p>	<p>I oppose the entire Arete collective and the further dilution of our community to the hands of money hungry sharks... I oppose the altering of any more of our country land. It is with the entirety of my being to oppose this development and alteration. This brings shame onto the entire island community shame to those who allow and shame</p>	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.


		answer	<p>place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa‘akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not include mitigation measures for the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa‘akai Framework Analysis., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant’s modeling does not use the State of Hawai‘i’s required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa‘a Kuilima, and I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	to all those who remain silent.	
Ana Baldinger		I live in Kahuku.	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa‘akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any</p>	<p>Aloha,</p> <p>As a community member who has seen firsthand the harm this development is causing, I ask that CWRM deny this permit due to a lack of a complete Ka Pa‘akai Framework Analysis. This means:</p> <ul style="list-style-type: none"> • Inadequate flood-risk modeling 	<p>I authorize Kūpa‘a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource</p>


			<p>culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<ul style="list-style-type: none"> • Cumulative ecological and cultural impacts of continued stream alteration • The applicant has not explained the broader development plan this culvert is part of, preventing the Commission and the public from understanding cumulative project impacts. <p>The community demands transparency. Mahalo.</p>	Management.
Kawelakai Kahahawai Farrant		<p>I live in a nearby community., I am a Native Hawaiian cultural practitioner., I am a lineal or cultural descendant with ancestral ties to the area.</p>	<p>I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully list the extent of the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully describe the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not include mitigation measures for the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the</p>	<p>Aloha kakou,</p> <p>O wau no o Kawelakai Kahahawai Farrant. He kupa au no Paumalu, Ko'olauloa. 'O Ko'olaupoko ku'u kulaiwi.</p> <p>As a lifelong resident of Paumalu, Ko'olauloa and a cultural practitioner along the Kahuku coast for over 10 years, I strongly urge the CWRM to reject the Stream Channel Alteration Permit (SCAP.6438.3) proposed at 'O'io stream on the basis that the proposed work would adversely affect traditional, customary, and subsistence activities along that coastline, and that those impacts have not been adequately identified or addressed via any</p>	<p>I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.</p>

			<p>cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant’s modeling does not use the State of Hawai’i’s required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa’a Kuilima, and I support Kūpa’a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa’akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō’io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>cultural outreach by the developer or any past plans.</p> <p>I have contributed to ecological restoration along the Kahuku coastline, including that of 'O'io ahupua'a for over 10 years as part of my employment. This is one of the few remaining intact coastlines in the island of O'ahu. I regularly visit this shoreline in my personal time to gather plant cuttings for lei making, gather fish and other marine resources, and conduct ceremony. The proposed stream alterations stand to adversely affect the ecosystem which I and many others depend on to conduct traditional, customary, and subsistence practices. There are many other 'ohana from the Kahuku area and across O'ahu which regularly fish on this coastline and would be impacted by stream alterations. The current developer has failed to adequately consider and describe impacts to these practices in any existing documents, including those prepared by prior landowners. A Ka Pa'akai Framework analysis must be completed prior to any further action toward these proposed stream modifications.</p>	
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				<p>I strongly urge the CWRM to uphold its mandate to protect Native Hawaiian rights, stream resources, and the public trust by rejecting this permit application and holding any future resubmissions to the highest levels of scrutiny.</p> <p>Ke aloha aina no, Kawelakai Kahahawai Farrant</p>	
Melvin Hovakimian		<p>I live in a nearby community., I work in or near Kahuku., I care about protecting streams, ecosystems, and cultural practices.</p>	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses</p>		<p>I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.</p>

			are completed.		
Rexann Dubiel Shanahan		I live in a nearby community., I work in or near Kahuku., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices., Other: Short answer	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.	Preserve. Honor. Abide by the law. Do what's pono for the Kahuku residents, especially the local people who have called Kahuku home for many generations.	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.
Vikki Pahia		I live in a nearby community., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices., Other: Short	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding,	Outsiders, non kanaka, entitled investors come to our islands without any interest in learning and/or immersing themselves in our island, our lifestyles, our culture, cultural practices or beliefs. They feel they can do whatever, however, whenever anything they like to make money. They have	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water


		answer	<p>which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>no thoughts or concerns as to how it affects our aina, our lives, and the peoples of this special place who are here now, will be here in the future and others who have gone before us. The present and future generations of our aina ARE your priority NOT outside money makers who will be gone when they are done taking! Mahalo</p>	Resource Management.
Rebecca Canright		<p>I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.</p>	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>As a young person, I cherish this community and its stunning ecosystems. I know we can work together to protect future generations of wildlife and this precious land, by making wise decisions now. Thank you.</p>	<p>I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.</p>
Sunshine Eckstrom		<p>I live in a nearby community., I work in or near Kahuku., I come to this area regularly., I care</p>	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the</p>	<p>I oppose this request by outside developers to alter 'O'io Stream. Wasatch Arete TB Holdings have no true concern for the effects it would have on the local</p>	<p>I authorize Kūpa'a Kuilima to include my name and testimony in</p>


		about protecting streams, ecosystems, and cultural practices.	existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.	community's people and environment. They will do the bare minimum to get the permits they need to develop what they want to make themselves money. They engage in green-washing to placate those in opposition to their plans, but we've seen how their type of exploitation has hurt O'ahu throughout the years and how it continues to do so today. Let's not permit them to harm us going forward.	the official submission to the Commission on Water Resource Management.
Joan Koff		I live in Kahuku., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and		I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.


			<p>I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>		
Theresa Nelson		I live in Kahuku.	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa‘akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant’s modeling does not use the State of Hawai‘i’s required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa‘a Kuilima, and I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>I live in the condos at Turtle Bay and I have watched flood waters rise all the way to my back door every year since 2020. This project is being built in a flood zone which will create run off into our waters and protected marine areas. Monk seals no longer come to give birth to their pups here since construction began. The shore is eroding yet the buildings going up are right next to the erosion which will cause more dumping and chemicals into our ocean waters. Won't be able to fish here. Turtles, monk seals and whales are already leaving this area with construction interfering with migration, feeding, birthing. Stop the construction. Move it away from our eroding coastlines. Get updates environmental impact studies. Do the right thing for this community and environment. Stop making the rich richer and save our</p>	<p>I authorize Kūpa‘a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.</p>



				resources and land. No more building north shore! Also, roads already can't handle the construction vehicles tearing it up. Work on infrastructure first instead of overwhelming a small community that was not meant to be expanded.	
John Thielst		I live in a nearby community., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices., Other: Short answer	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.	Using old environmental reviews (SEIS, SMA, etc.), instead of updated studies that reflect today's conditions is wrong for the sensitive area and environment now in the 21st century. New updated studies need to be done and should be required. This is a terrible project for the area. Area should be left a natural environment, for the sea life, birds, monk seals that visit the area frequently.	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.
Edward Oroyan		I live in a nearby community., I come to this	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 -	As a farmer, I understand first hand how waterways affect everyone along that	I authorize Kūpa'a Kuilima to


		area regularly., I care about protecting streams, ecosystems, and cultural practices.	Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.	watershed. With changing climate and yearly flooding proper research is the only responsible way forward in developments holding responsibility along waterways. Beyond that, this area is a culturally significant spot that should have clear outlines in how those sacred and historical areas will be preserved and maintained.	include my name and testimony in the official submission to the Commission on Water Resource Management.
Alex Logsdon		I live in a nearby community., I work in or near Kahuku., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022		I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.


			<p>Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa‘a Kuilima, and I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>		
Barbara Fisher		<p>I live in Kahuku., Myself and/or my ‘ohana have been in Kahuku for generations., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.</p>	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa‘akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant’s modeling does not use the State of Hawai‘i’s required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa‘a Kuilima, and I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit</p>		<p>I authorize Kūpa‘a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.</p>



			until all required cultural, environmental, and hydrologic analyses are completed.		
Frances Parker		I live in a nearby community., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.	Kūpa'a Kuilima We respectfully call on decision-makers to halt the proposed development of luxury hotels at Kawela Bay and Turtle Bay, protect our coastal environment, and prioritize the needs of the local community over large-scale commercial interests. The North Shore is served by a two-lane highway that already experiences frequent congestion and traffic standstills. Large-scale hotel construction would require heavy machinery, oversized vehicles, and long-term increases in traffic that our roads are not designed to support. This would create safety risks, delay emergency access, and significantly disrupt daily life for residents. Kūpa'a Kuilima — Stand Firm for the Land, the Ocean, and the People.	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.
Joy Silver		I live in a nearby community., I work in or near Kahuku., I come to this area regularly., I care about protecting streams, ecosystems, and cultural	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding,	Water is life. We need to look to Native Hawaiian as well as other indigenous cultures and understand the importance of protecting water. We are stewards of this land. Please understand that what we do today affects all future generations and species.	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water


		practices.	which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.		Resource Management.
Anneliese Holmes		I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned	Concrete culverts reduce biodiversity and water quality of stream ecosystems and disrupt the flow of water, organisms, and sediment through the stream. On a planet suffering from a decline in biodiversity we it's shameful to endanger any of Hawai'i's endemic species, which include endemic plants, insects, and fish that live in streams that would be directly harmed by this alteration. Native stewardship protects important ecological features such as 'Ō'io Stream and to move forward with this development without proper guidance and approval from Native	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.


			that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.	Hawaiian practitioners and communities.	
Erin Hagan		I live in a nearby community., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.	I am especially concerned that the applicant has not explained the broader development plan this culvert is part of, preventing the Commission and the public from understanding the cumulative ecological and cultural impacts of the project.	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.
Joan		I live in Kahuku., I come to this area regularly., I care about protecting	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA	I have treasured the solitude of this area for more than 50 years. It saddens me that this small sliver of pristine ocean will	I authorize Kūpa'a Kuilima to include my name and


		streams, ecosystems, and cultural practices., Other: Short answer	consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.	be developed for the benefit of the greedy!	testimony in the official submission to the Commission on Water Resource Management.
Richard Swaja		I live in Kahuku., I work in or near Kahuku., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for	This is a very special area that is in the process of being destroyed without the proper permits or studies. We understand the desire to develop this land, but please do an updated environmental impact study so this land is not completely destroyed.	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.

			safe and prudent decision-making., I stand with Kūpa‘a Kuilima, and I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.		
Mayumi swaja		I live in Kahuku., I work in or near Kahuku., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa‘akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant’s modeling does not use the State of Hawai‘i’s required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa‘a Kuilima, and I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.	Please do the right thing here everybody! Arete has been deceiving us from the very beginning. Update those studies and if everything is ok than that is fine. Just don’t lie and hide things.	I authorize Kūpa‘a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.



Thomas Atkin		I come to this area regularly.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.		I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.
John Nijhawan		I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully list the extent of the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully describe the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not include mitigation measures for the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model		I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.



			<p>update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa‘a Kuilima, and I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>		
Steven Deveney		<p>I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.</p>	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa‘akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant’s modeling does not use the State of Hawai‘i’s required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa‘a Kuilima, and I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses</p>		<p>I authorize Kūpa‘a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.</p>


			are completed.		
Laura Zoller		I live in a nearby community., I work in or near Kahuku., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.	The fishers and more importantly the Hawaiian monk seals, turtles, and flora depend on this stream for nourish ment. PLEASE LEAVE IT ALONE.	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.
Andy Silvestri		I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding,		I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water



			<p>which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>		Resource Management.
Martin Devey		<p>I live in a nearby community., I work in or near Kahuku., I care about protecting streams, ecosystems, and cultural practices.</p>	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned</p>	<p>Do not approve without correct documentation first. This community doesn't want development. This coast line doesn't want to be torn apart for the rich. Think about the people of this island. What benefits them? Definitely not big corporation money taking from the land and people.</p>	<p>I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.</p>


			that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.		
Kehau Plemer		I live in a nearby community., I care about protecting streams, ecosystems, and cultural practices.	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa‘akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully list the extent of the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa‘akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully describe the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa‘akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not include mitigation measures for the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa‘akai Framework Analysis., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant’s modeling does not use the State of Hawai‘i’s required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa‘a Kuilima, and I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems, cultural</p>		I authorize Kūpa‘a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.


			practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.		
Hannah Corsi		I live in a nearby community., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.		I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.
Dan Raykes		I care about protecting streams, ecosystems,	I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community.	Humans have devastated this planet by capitalistic expansion. When do we put the planet first and work to	I authorize Kūpa'a Kuilima to include my


		and cultural practices.		protect it. Natural streams should stay untouched. It is ok to say no and put Mother Earth first for a change. When the community speaks please pay attention. Thank you	name and testimony in the official submission to the Commission on Water Resource Management.
Daniel Scruggs		I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.	This seems to be sacrificing the natural tranquility and wellbeing of many for the luxury of a few.	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.
Roger Dysvick		I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are	I believe that communities have the right to protect their surrounding environment and cultures.	I authorize Kūpa'a Kuilima to include my name and testimony in the official



			<p>incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>		<p>submission to the Commission on Water Resource Management.</p>
David Fisher		<p>I live in a nearby community., I work in or near Kahuku., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.</p>	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned</p>		<p>I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.</p>


			that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.		
Nancy Harter		I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.	Please do what you can to protect the aina and oio stream and stop this project. The ramifications of such a project without adequate research and understanding of impacts could be very negative. Thank you for helping to preserve and protect the aina and do not allow this project to move forward. Mahalo	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.
D. Provance		I care about protecting streams, ecosystems, and cultural	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA	The stream is a cultural and ecological resource. Because, the proposed culvert does not meet community and state	I authorize Kūpa'a Kuilima to include my name and


		practices., Other: Short answer	consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.	requirements, the application must be denied.	testimony in the official submission to the Commission on Water Resource Management.
Thomas Lynch		I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for		I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.


			<p>safe and prudent decision-making., I stand with Kūpa‘a Kuilima, and I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>		
hannah neville		<p>I live in a nearby community., I work in or near Kahuku., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.</p>	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa‘akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant’s modeling does not use the State of Hawai‘i’s required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa‘a Kuilima, and I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>I believe that approval of this permit will directly lead to negative cumulative ecological and cultural impacts of the area and community surrounding.</p>	<p>I authorize Kūpa‘a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.</p>

Kilinahemali e Ling		I live in a nearby community., I work in or near Kahuku., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully list the extent of the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully describe the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not include mitigation measures for the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses</p>	<p>Aloha kāua, my name is Kili and I reside in Paumalū, a few ahupua'as over from Kahuku. Place names in Hawai'i tell a story of the significance of that place, and 'Ō'io Stream is an example of that. The naming of 'Ō'io Stream shows us that this place is capable of holding an abundance of bonefish ('ō'io), who typically live in shallow sandflats and reef areas. Constructing a permanent concrete structure would undoubtedly change the environment in which the 'ō'io inhabit, thus potentially resulting in the loss of 'ō'io in the area. A loss in fish in the area would adversely impact the health of our reefs nearby. The environmental and cultural costs that come with the culvert far outweigh the reason to construct one, and I strongly support Kūpa'a Kuilima's call for the Commission on Water Resource Management to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Mahalo nō.</p>	<p>I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.</p>
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			are completed.		
Cynthia Flint Groves		I live in a nearby community., I care about protecting streams, ecosystems, and cultural practices., Other: Short answer	I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.		I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.
Irwin Koff		I live in Kahuku., I come to this area regularly., Other: Short answer	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any	Please help the area stay rural. Destroyed natural and cultural habitat for the sake of a few rich people doesn't work for us!	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource


			culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.		Management.
Ana Baldinger		I live in Kahuku.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old	I ask that CWRM does NOT approve a permit for a new concrete culvert across 'O'io Stream at Turtle Bay (SCAP.6438.3). The community does not want this.	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.


			documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.		
Harald von Sydow		I live in a nearby community., I care about protecting streams, ecosystems, and cultural practices.	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>Protecting 'Ō'io Stream matters because it is not just a drainage feature—it is a living, culturally significant waterway that supports native ecosystems, reflects traditional Hawaiian stewardship practices, and helps manage flooding in a changing climate. 'Ō'io Stream connects mauka to makai, carrying fresh water, nutrients, and life to coastal areas. Altering it with permanent concrete infrastructure risks long-term harm: increased flooding upstream and downstream, loss of habitat, disruption of cultural practices, and irreversible impacts driven by outdated data that does not reflect today's rainfall patterns, sea level rise, or groundwater conditions. Once a stream is channelized, the damage cannot easily be undone. Protecting 'Ō'io Stream means honoring cultural responsibility, following sound science, and choosing resilient, forward-looking solutions that safeguard both the land and the community for future generations.</p>	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.

<p>Damien Nākoa Farrant</p>		<p>I live in a nearby community., I am a Native Hawaiian cultural practitioner., I work in or near Kahuku., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.</p>	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully list the extent of the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully describe the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not include mitigation measures for the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>Aloha kākou, I am a Native Hawaiian who was born and raised in Paumalu, O'ahu which is about four miles from 'Ō'io stream. I also hold a Ph.D. in environmental science and management. I have witnessed considerable development by Turtle Bay for decades, the vast majority of which has diminished natural and cultural resources. This new effort to construct a concrete culvert in 'Ō'io stream threatens existing water flow from mauka to makai and has high potential to increase risk of flooding and create complications with rising sea levels. The negative impacts of concrete culverts on hydrological cycles are evident across Hawai'i and in many other parts of the world. By further disrupting stream flow and hydrological cycles in 'Ō'io stream, this proposed project threatens the mixing of terrestrial fresh water and nutrients with the coastal environment that produces an abundance of limu and other marine life that are key parts of cultural traditions. In addition to the threats that this project poses to the natural ecological cycles and cultural practices, the effort</p>	<p>I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.</p>
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				<p>to rush this and related permits for development initiatives reflect a lack of respect for existing policies and procedures including but not limited to the rules set forth with the Ka Pa'akai Framework Analysis. These procedures and frameworks are designed to ensure that developers and agencies are accountable to communities and Native Hawaiian traditional and customary practices. Rushing through these procedures with outdated information for the convenience of implementing this and other projects is a disservice to the intention of those frameworks and the communities that they are designed to serve.</p> <p>I would like to see this permit denied as it poses threats to ecosystems and cultural practices now and in the future. Any further consideration of this project needs to at least be deferred until flood hazard analyses have been updated and community members have been consulted more extensively to ensure that any modifications do not impact Native Hawaiian traditional and customary rights now and in the future.</p>	
Karen		I live in Kahuku.,	I oppose the Stream Channel Alteration Permit (SCAP.6438.3)	This project offers no	I authorize



Turner		I care about protecting streams, ecosystems, and cultural practices.	requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.	benefit to the community of Kahuku. The coastline for the development is an important area for native species and should be preserved, a high end condo development is a shameful addition to the North Shore.	Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.
Davina Sanders		I live in Kahuku., Myself and/or my 'ohana are from Kahuku., Myself and/or my 'ohana have been in Kahuku for generations., I live in a nearby community., I am a Native Hawaiian cultural practitioner., I	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully list the extent of the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully describe the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section	O Kahawai Oio he tupuna oia. Along it's ancient ala grew abundance "ma Oio he mau mala awa, noni, wauke, ko, maia, uwala, he kula mahiai uala, ipu, he loi kalo kekahi, he ulu hala, he aina paakai.." Mai mauna a makai. Ola ika wai a kahawai oio. Io.	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.


		<p>am a lineal or cultural descendant with ancestral ties to the area., I work in or near Kahuku., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices., Other: Short answer</p>	<p>7 - Ka Pa‘akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not include mitigation measures for the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa‘akai Framework Analysis., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant’s modeling does not use the State of Hawai‘i’s required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa‘a Kuilima, and I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>		
<p>Kimberly Kahahawai Farrant</p>		<p>I live in a nearby community., I care about protecting streams, ecosystems, and cultural practices.</p>	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa‘akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully list the extent of the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa‘akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully describe the potential impacts to the native rights and traditional and customary practices that take</p>	<p>There has been no sound assurance given that this construction will not disrupt ‘Ō‘io stream and the ecology of the surrounding ‘āina. I am Native Hawaiian and live only a few miles away. We enjoy and mālama this coastline. Do not allow it to be compromised for generations to come.</p>	<p>I authorize Kūpa‘a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.</p>


			<p>place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not include mitigation measures for the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>		
Vikki Pahia		<p>I live in a nearby community., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices., Other: Short answer</p>	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any</p>	<p>This permit should be denied by CWRM based on noncompliance. The developers knew what was required to get approval yet they chose to NOT do the work. Instead sliding in outdated studies, showing ignorance on future specs, justification and why it's needed in order to move forward in development.</p>	<p>I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource</p>

			<p>culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>Blatantly showing NO documentation of any response to the concerns of meeting the basic legal scientific and cultural requirements. Is it entitlement due to the Department of Planning and Permitting issuing a determination to proceed on same developers request on 11/22/25 to move forward with development based on the same outdated studies, no documentation and no information? Please do not allow outsiders/developers who blatantly disrespect and/or disregard our islands, its people and its culture, to receive approval of any/all permits/requests without completely disclosing, satisfying, addressing, meeting and fully implementing and satisfying ALL requirements, updated studies, concerns, cultural practices and promises made! PERIOD!</p>	<p>Management.</p>
Keiko Mori		<p>I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.</p>	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any</p>	<p>This area is Hawaiian Monk Seal habit. This building plan already destroyed so many wildlife and iwi kupuna. I have come to this area to protect Hawaiian Monk Seal for 10 years. It is Endangered species and Hawaii State's mammal species. We have to protect them from these destroying coastline project.</p>	<p>I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource</p>


			culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.		Management.
Anne Shiparski		I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices., Other: Short answer	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old	I strongly urge CWRM to defer or deny this permit. 'Ō'io Stream is a vital freshwater resource and part of a larger watershed that holds ecological, cultural, and community significance. Approving a concrete culvert without fully resolving outstanding legal, environmental, and cultural analyses undermines the public trust doctrine and sets a dangerous precedent for water governance in Hawai'i. Protecting 'Ō'io Stream means prioritizing long-term watershed health, transparency, and community stewardship over short-term development convenience.	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.


			documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.		
Sele Williams-totten		I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices., Other: Short answer	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.	I was born and raised here, and 'Ō'io Stream is part of the place that shaped my community and my understanding of mālama 'āina. This project threatens the natural flow and health of the stream and ignores the voices of people who live here and depend on these resources. Once concrete is poured, the damage is permanent. I believe CWRM should deny this permit and choose to protect the future of this watershed for generations to come.	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.
Candice Frontiera		I come to this area regularly., I care about protecting streams, ecosystems,	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the	Upholding public access to sacred spaces, protecting wildlife habitat, and re-examining this project's impacts under current conditions are essential. I	I authorize Kūpa'a Kuilima to include my name and testimony in



		and cultural practices.	existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.	respectfully urge the Commission to continue to deny approval of this permit. The lack of transparency regarding the broader development plan associated with this culvert prevents meaningful assessment of the cumulative impacts. 'Ō'io Stream is a living resource of cultural, ecological, and hydrological significance, and permanent alteration requires heightened scrutiny. The applicant has not met that standard.	the official submission to the Commission on Water Resource Management.
Sherry Dornan		I live in Kahuku.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and	We need this stream to be unimpeded as one of the only streams that flows to the ocean in this area. The area also regularly floods after a big rain and this may alter the natural course to drain the area. Please don't let this happen without a current study.	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.

			<p>I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>		
<p>Emma McCullough</p>		<p>I live in a nearby community., I work in or near Kahuku., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.</p>	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa‘akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant’s modeling does not use the State of Hawai‘i’s required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa‘a Kuilima, and I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>I am a Haleiwa resident raising my family near Kaunala Stream and Waiale‘e fish pond (a few miles from ‘Ō‘io Stream). In regards to the North Shore Club development, I am deeply disturbed by Arete’s lack of due diligence, integrity, and consideration for community values and cultural ramifications. This important decision MUST be informed by up-to-date impact analyses and government agencies MUST hold them accountable to this reasonable standard.</p>	<p>I authorize Kūpa‘a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.</p>

kristina jenness		I live in a nearby community., I work in or near Kahuku., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.	This is blatant bribery to develop the area unlawfully	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.
Sunshine Eckstrom		I live in a nearby community., I work in or near Kahuku., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the	Once again, I strongly oppose this request by outside developers to alter 'O'io Stream to suit their needs. They have no concern for the effects such alteration will have on the local environment and community. They want to exploit our beautiful land and sea with no regard for the long term damage they will do to those very things.	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.


			<p>cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>They'll eventually be off working on their next project and as always, we'll be left paying the true price.</p>	
Shaeralee-Ti are Manosa		Other: Short answer	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully list the extent of the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully describe the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not include mitigation measures for the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream</p>	<p>I believe that this decision is up to those who have direct ties to this `āina. What they know is what everyone else needs to learn. Until those lineal descendants approve the plan, updated and/or rewritten, no other decision should be made.</p>	<p>I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.</p>


			<p>alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>		
Sheldon Plentovich		I live in a nearby community., I work in or near Kahuku.	<p>I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>To care for this beloved coastline, I don't believe any additional development should occur without a current evaluation of the environmental and cultural impacts of the cumulative plans. So many things have changed since the last environmental review, including the discovery and listing of yellow-faced bees, the beginning of the nesting of Laysan Albatross, the nesting of honu, etc. There is unpermitted harm to protected species occurring on the property and I would hate for this to continue. Several protected species use the "stream" in its current state and I haven't seen any evaluation of how this and related projects will affect wildlife and the</p>	<p>I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.</p>

				ecosystem as a whole.	
Ashley Ancheta Galacgac		I care about protecting streams, ecosystems, and cultural practices., Other: Short answer	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>The CWRM should be denied because the people of the place do not consent. We must take action to ensure that lineal descendants that go back generations continue to be on these lands, steward the place and waters, and restore pono ways. Born and raised in Hawai'i, I have seen the environmental and social impacts with development that put money-driven outcomes over the health and wellness of people. I believe that the community of Kahuku have taken care of the place and we need to listen to them and support their decisions on how to protect the watershed and everything.</p>	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.
Beth Ratkewicz		I care about protecting streams, ecosystems, and cultural practices., Other: Short answer	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding,</p>	<p>When we travel to Hawaii, it is to experience the natural paradise that it is. We no longer plan to go to Honolulu, as we cherished the North Shore as well as other shores that have not become overdeveloped. Honolulu previously consisted of a natural shore with clean fresh water, too,</p>	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water



			<p>which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., I stand with Kūpa‘a Kuilima, and I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>filtered by plants. Traveling to Hawaii is an expense, and we are not about to waste it on fake shores. There is so much knowledge resurfacing of how Hawaii's water shed should be cared for. Knowledge that comes from the old ways as well as knowledge coming from ecological scientists. We have no interest in spending our money at a place that fails to treat the A'ina with the respect we deserve it to be treated, for all of us.</p>	<p>Resource Management.</p>
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Additional Community Testimony RE: SCAP 6438.3


Melissa Ka'onohi-Camit		<p>I live in Kahuku., Myself and/or my 'ohana are from Kahuku., Myself and/or my 'ohana have been in Kahuku for generations., I am a lineal or cultural descendant with ancestral ties to the area., I work in or near Kahuku., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.</p>	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully list the extent of the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully describe the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not include mitigation measures for the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The</p>	<p>I live in Kahuku and come from 'ohana who have cared for this place for generations. 'Ō'io Stream is not just infrastructure to us, it is a living system tied to our cultural practices, food sources, and the health and safety of our community. Decisions about altering this stream cannot be made using outdated studies or incomplete analyses that fail to account for cumulative impacts, current flood risks, and Native Hawaiian rights. Approving this permit without a complete Ka Pa'akai Framework Analysis, updated flood modeling, and meaningful consultation would undermine the public trust and place our community at further</p>	<p>I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.</p>
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			<p>applicant’s modeling does not use the State of Hawai‘i’s required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa‘a Kuilima, and I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	<p>risk. Protecting ‘Ō‘io Stream is about safeguarding our waters, honoring our kuleana to our ancestors, and ensuring a resilient future for our keiki. I urge CWRM to continue deferring, or deny, this permit until all required cultural, environmental, and hydrologic analyses are fully and properly completed.</p>	
<p>Michael Camit,</p>		<p>I live in Kahuku., Myself and/or my ‘ohana are from Kahuku., Myself and/or my ‘ohana have been in Kahuku for generations., I am a Native Hawaiian cultural practitioner., I care about protecting streams, ecosystems, and</p>	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa‘akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully list the extent of the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa‘akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully describe the potential impacts to the native rights and traditional and customary</p>		<p>I authorize Kūpa‘a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.</p>


		cultural practices.	practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa‘akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not include mitigation measures for the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa‘akai Framework Analysis., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant’s modeling does not use the State of Hawai‘i’s required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa‘a Kuilima, and I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring		
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			this permit until all required cultural, environmental, and hydrologic analyses are completed.		
Shayna Noelani Dabis-Tom		I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully list the extent of the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa'akai Framework Analysis., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community.		I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.
Pamela Johnson		I live in a nearby community., I work in or near Kahuku., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices.	I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be	This area has endangered marine life that will be impacted.	I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.

			<p>required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>		
Laura Zoller		<p>I live in a nearby community., I work in or near Kahuku., I come to this area regularly., I care about protecting streams, ecosystems, and cultural practices., Other:</p>	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These</p>	<p>Our wildlife needs to get nutrients from this water to flourish. At least 10 seals regularly haul out and feed at TBR. WE HAD 0/20 turtle nests in 2025- because of the constant blocking of water through illegally distributed sand.</p>	<p>I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water</p>

		Short answer	<p>flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant's modeling does not use the State of Hawai'i's required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa'a Kuilima, and I support Kūpa'a Kuilima's call for the Commission to defer approval of this permit until a complete Ka Pa'akai Framework Analysis and flood-risk assessment are conducted. Protecting 'Ō'io Stream is critical to maintaining the health of our ecosystems, cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>	Save our shore, flora and fauna.	Resource Management.
Ivana Joaquin		<p>I live in Kahuku., Myself and/or my 'ohana are from Kahuku., Myself and/or my 'ohana have been in Kahuku for generations., I</p>	<p>I oppose the Stream Channel Alteration Permit (SCAP.6438.3) requested by Wasatch Arete TB Holdings., I urge the Commission to defer decision-making until compliance with Article XII, Section 7 - Ka Pa'akai Framework Analysis is fulfilled, as the existing SEIS and CIA are inadequate, outdated and the consultation in the CIA consists of many paid employees of the developer., I am a Native Hawaiian and/or cultural practitioner and the</p>	<p>I strongly oppose and urge CWRM to speak to the future of the watershed and the preservation of cultural and natural resources with the community. How are</p>	<p>I authorize Kūpa'a Kuilima to include my name and testimony in the official submission</p>

		<p>live in a nearby community., I am a Native Hawaiian cultural practitioner., I care about protecting streams, ecosystems, and cultural practices.</p>	<p>documents provided do not fully list the extent of the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa‘akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not fully describe the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa‘akai Framework Analysis., I am a Native Hawaiian and/or cultural practitioner and the documents provided do not include mitigation measures for the potential impacts to the native rights and traditional and customary practices that take place in the vicinity of the project as required by Article XII, Section 7 - Ka Pa‘akai Framework Analysis., I believe the existing flood hazard analysis and flooding scenarios modeled are incomplete, as UH Mānoa experts have stated that the low and intermediate low scenarios used for sea level rise projections are obsolete. These flood-risk studies only include outdated sea level rise/storm surge and do not contemplate groundwater flooding, which is a critical component and should be required before any culvert or stream alteration is approved., I am concerned about the cumulative impacts of stream modifications on ecosystems and the well-being of the community., The applicant’s modeling does not use the State of Hawai‘i’s required standards—including the 2022 Sea Level Rise Vulnerability & Adaptation Report, the 2025 passive flooding model update, or the SLR-XA—which must be included for safe and prudent decision-making., I stand with Kūpa‘a Kuilima, and I support Kūpa‘a Kuilima’s call for the Commission to defer approval of this permit until a complete Ka Pa‘akai Framework Analysis and flood-risk assessment are conducted. Protecting ‘Ō‘io Stream is critical to maintaining the health of our ecosystems,</p>	<p>they going to plan for future responsibilities if any damages are done to natural and cultural resources?</p>	<p>to the Commission on Water Resource Management.</p>
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			<p>cultural practices, and community resilience in Kahuku., I am concerned that approving this permit based on outdated, decade-old documents, without rigorous re-examination of current conditions, would set a dangerous precedent, undermine the Public Trust Doctrine, and weaken protections for Native Hawaiian rights under Article XII, Section 7., I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>		
Kurt Fevella		<p>I care about protecting streams, ecosystems, and cultural practices.</p>	<p>I urge CWRM to continue deferring this permit until all required cultural, environmental, and hydrologic analyses are completed.</p>		<p>I authorize Kūpa'a Kuilima to include my name and testimony in the official submission to the Commission on Water Resource Management.</p>

Dear Commissioners,

Aloha mai kākou,

My name is David H. Stant Jr, and I am a resident of the Ko‘olaupia/North Shore community. I am submitting testimony in strong support of approval of the Stream Channel Alteration Permit (SCAP) for the Kapa‘a Bridge project.

I want to respectfully ask the Board to stay focused on what is actually before you today. This permit is only for the Kapa‘a Bridge and associated work within the channel. It is not a permit for the entire Turtle Bay development, and it should not be treated as such.

Much of the opposition testimony I’ve heard is not about the bridge or the stream channel at all. Instead, it appears to be an attempt to stop the entire project by delaying this permit and calling for another SEIS. That request goes far beyond the scope of this application and, in my view, is not justified.

This project has already gone through more than a decade of study, review, and public process, including a Cultural Impact Assessment and a Final SEIS that was accepted and approved. Requiring the applicant to redo the entire FSEIS again—when this permit involves the same bridge project previously approved by the Commission in 2022—does not serve the community or the process.

I have attended community meetings, outreach sessions, and Neighborhood Board presentations over the years, and I have seen sincere efforts by Areté Collective and Turtle Bay to listen to community concerns, engage with kūpuna, fishermen, cultural practitioners, and residents, and make informed decisions. These efforts matter.

It is also important to remember that the East Main Drain is an engineered drainage system, not a natural stream with traditional or customary practices occurring within the culvert area. The permit request reflects that reality.

This bridge project will support long-term shoreline management, improve infrastructure, and help create hundreds of jobs that will directly benefit our local community. Holding up this permit for reasons unrelated to its actual scope only hurts working families and delays needed improvements.

I respectfully urge the Commission to evaluate this application based on the facts, the studies already completed, and the specific permit being requested—not on broader objections to the overall development.

Mahalo nui loa for the opportunity to provide testimony and for your continued service to our community.

Me ke aloha,

David H. Stant Jr

From: [Lstant](#)
To: [DLNR.CW.DLNRCWRM](#); [Kariya-Ramos, Suzanne M](#)
Cc: [Lstant](#)
Subject: [EXTERNAL] Agenda B1 – Support of SCAP Approval for the Kapa‘a Bridge Project
Date: Monday, January 19, 2026 7:42:43 AM

Dear Commissioners,

Aloha mai kākou,

My name is Laurie Ann L. Stant, and I live in the Ko‘olauloa / North Shore area. I am writing in support of approval of the Stream Channel Alteration Permit (SCAP) for the Kapa‘a Bridge project.

I respectfully ask the Commission to consider this application based on the specific permit before you. This SCAP request applies only to the Kapa‘a Bridge and work within the existing channel. It is not an approval for the full Turtle Bay development, and it should not be evaluated as if it were.

Some opposition testimony has raised concerns about flooding, groundwater impacts, and potential harm to the ‘Ō‘io Stream habitat. I appreciate those concerns, but I believe they have already been carefully studied and addressed through the existing environmental review process. The project is supported by extensive hydrology, flood hazard, and environmental analyses that were completed as part of the Final SEIS and related technical studies.

It is also important to note that the East Main Drain is an engineered drainage system designed to manage stormwater flows. It is not a natural stream supporting traditional or customary practices within the culvert area. For that reason, the suggestion that this permit would cause irreversible harm to a natural stream environment does not accurately reflect the conditions on the ground.

Calls to delay this permit until another SEIS is conducted go well beyond the scope of the SCAP application. The bridge project itself was previously reviewed and approved by this Commission in 2022, and there has been no new information presented that would justify reopening the entire Final SEIS process.

As a community member, I also recognize the responsibility we have to care for the land and ocean. In this case, I believe that responsibility has been met through years of study, consultation, and engagement with cultural practitioners, environmental groups, fishermen, kūpuna, and residents. Continuing to delay this permit does not provide additional environmental protection, but it does delay infrastructure improvements and job opportunities that our community needs.

This project will support shoreline management, public safety, and long-term resilience while creating hundreds of local jobs. Evaluating this permit on its actual merits, rather than broader opposition to unrelated aspects of the development, is both fair and appropriate.

For these reasons, I respectfully urge the Commission to approve the Stream Channel Alteration Permit for the Kapa‘a Bridge project.

Mahalo nui loa for your time and consideration.

Me ke aloha,

Laurie Ann L. Stant

From: [DLNR.CW.DLNR CWRM](#)
To: [Kariya-Ramos, Suzanne M](#)
Subject: FW: [EXTERNAL] Kapa'a Bridge
Date: Tuesday, January 20, 2026 1:30:08 PM

From: Kauai Benson [REDACTED]
Sent: Monday, January 19, 2026 8:29 AM
To: DLNR.CW.DLNR CWRM <dlnr.cwrn@hawaii.gov>
Subject: [EXTERNAL] Kapa'a Bridge

Dear Commissioners,

Aloha mai kākou,

My name is Kauai Benson, and I am a resident of the Ko'olaupia / North Shore community. I respectfully submit this testimony in support of approving the Stream Channel Alteration Permit (SCAP) for the Kapa'a Bridge project.

I ask the Commission to evaluate this application within its proper and legally defined scope. The permit before you is limited to work associated with the Kapa'a Bridge and improvements within the existing channel. It is not an application for the broader Turtle Bay development, nor does it reopen land use or zoning approvals that were addressed through prior processes.

Opposition testimony has raised concerns regarding flood hazards, groundwater impacts, and potential adverse effects on stream habitat. These concerns are important; however, they are not new and have already been evaluated through extensive environmental review. The project is supported by more than a decade of study, including hydrologic and flood hazard analyses conducted as part of the Final Supplemental Environmental Impact Statement (FSEIS), which was accepted and relied upon by regulatory agencies.

No substantive new information has been presented that would justify reopening or repeating the FSEIS process. Requiring a new SEIS for a project element that was previously reviewed and approved would exceed the scope of this permit and undermine the integrity of the environmental review framework.

It is also critical to accurately characterize the project area. The East Main Drain is an engineered drainage facility designed to convey stormwater and manage flood flows. It is not a natural stream supporting traditional or customary practices within the culvert area affected by this permit. Assertions that approval of this SCAP would cause irreversible harm to a natural stream environment are inconsistent with the documented

conditions of the site and prior agency findings.

The Kapa'a Bridge project itself was approved by this Commission in 2022. The current permit request is consistent with that approval and necessary to allow the project to proceed as designed. Further delay based on issues unrelated to the specific scope of the SCAP would set an unreasonable precedent for infrastructure projects that have already undergone comprehensive review.

Approving this permit will support long-term shoreline management, improve public safety and infrastructure resilience, and provide meaningful employment opportunities for local residents. Continued delay does not enhance environmental protection; rather, it prolongs uncertainty and prevents the community from realizing the benefits of a project that has already met applicable regulatory requirements.

For these reasons, I respectfully urge the Commission to approve the Stream Channel Alteration Permit for the Kapa'a Bridge project based on the facts, the existing record, and the permit's defined scope.

Mahalo nui loa for your time, consideration, and service to our community.

Me ke aloha,

Sent from my iPhone

From: [Nick Starkel](#)
To: [DLNR.CW.DLNRCWRM](#); [Kariya-Ramos, Suzanne M](#)
Subject: [EXTERNAL] Agenda B1 – Testimony in Support of the Kapa‘a Bridge SCAP
Date: Monday, January 19, 2026 2:19:44 PM

Dear Commissioners,

Aloha mai kākou,

My name is Nicholas Starkel. I submit these comments in support of the Stream Channel Alteration Permit (SCAP) for the Kapa‘a Bridge project and do so with respect for both environmental review requirements and the integrity of agency decision-making.

The Commission’s role in this matter is narrow but important. The application before you concerns discrete work associated with the Kapa‘a Bridge and improvements within an existing drainage channel. It is not a request to reconsider the overall Turtle Bay development, nor does it reopen prior approvals that were resolved through earlier environmental and land use processes.

Several comments opposing the permit argue that flood risk, groundwater impacts, and stream habitat concerns require further environmental study, including preparation of an additional SEIS. From a procedural standpoint, such a request must be supported by evidence of significant new information or changed circumstances not previously analyzed. Based on the existing administrative record, those criteria have not been met.

The Final SEIS already evaluated hydrology, drainage capacity, flood behavior, and environmental impacts associated with the project area. Those analyses were reviewed and accepted by the appropriate agencies and relied upon in granting prior approvals, including this Commission’s 2022 approval of the Kapa‘a Bridge project. The current SCAP application does not introduce new project elements that would materially alter those conclusions.

It is also important to ground the analysis in accurate site conditions. The East Main Drain is a constructed drainage facility designed to manage stormwater conveyance. It does not function as a natural stream supporting traditional or customary practices within the area affected by the proposed work. Assertions to the contrary are not supported by the record.

Administrative processes depend on finality and consistency. Requiring additional environmental review without a legally sufficient basis would extend the scope of this permit beyond its intended purpose and weaken confidence in established review frameworks. Infrastructure projects that have undergone extensive analysis must be allowed to proceed when permit applications conform to prior approvals and regulatory standards.

For these reasons, I respectfully support approval of the Stream Channel Alteration Permit for the Kapa‘a Bridge project and encourage the Commission to act based on the existing record and the defined scope of the permit.

Mahalo for your time and careful consideration.

Respectfully,

Nicholas Starkel, Oahu Resident.

Re: Agenda # B1

Subject: Testimony in Support of SCAP Approval for the Kapa'a Bridge Project

Aloha Commissioners,

I am submitting testimony in support of Areté Collective and their development plans as it relates to the Stream Channel Alteration Permit for the Kapa'a Bridge project.

As an employee, I have found Areté Collective to be proactive, responsive, and a good partner in supporting sustainable development. From taking care of the golf courses, to proactively hiring the Hawaii Marine Animal Rescue to regularly monitoring by AECOS, and providing onsite wildlife education for staff and contractors, Areté has demonstrated a commitment to protecting the environment and natural and cultural resources in the larger development area.

Furthermore, Areté has validated its pledge to engage meaningfully with the community. They have listened to concerns and adjusted, including increasing setbacks, reducing the project footprint, and increasing the amount of native plants throughout the entire project.

For these reasons, I respectfully request that the Commission approve the Stream Channel Alteration Permit.

Mahalo,

Printed Name: ROGER W. CORPUZ

Signature: Roger W. Corpus

Date: 1-17-26

Re: Agenda # B1

Subject: Testimony in Support of SCAP Approval for the Kapa'a Bridge Project

Aloha Commissioners,

I am submitting testimony in support of Areté Collective and their development plans as it relates to the Stream Channel Alteration Permit for the Kapa'a Bridge project.

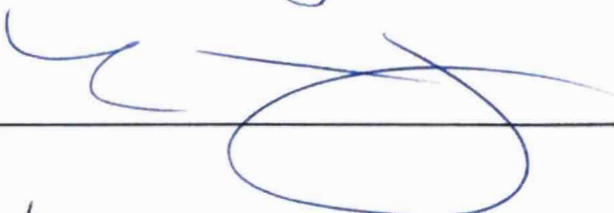
As an employee, I have found Areté Collective to be proactive, responsive, and a good partner in supporting sustainable development. From taking care of the golf courses, to proactively hiring the Hawaii Marine Animal Rescue to regularly monitoring by AECOS, and providing onsite wildlife education for staff and contractors, Areté has demonstrated a commitment to protecting the environment and natural and cultural resources in the larger development area.

Furthermore, Areté has validated its pledge to engage meaningfully with the community. They have listened to concerns and adjusted, including increasing setbacks, reducing the project footprint, and increasing the amount of native plants throughout the entire project.

For these reasons, I respectfully request that the Commission approve the Stream Channel Alteration Permit.

Mahalo,

Printed Name: Travis Joerger

Signature: 

Date: 1/15/26

Re: Agenda # B1

Subject: Testimony in Support of SCAP Approval for the Kapa'a Bridge Project

Aloha Commissioners,

I am submitting testimony in support of Areté Collective and their development plans as it relates to the Stream Channel Alteration Permit for the Kapa'a Bridge project.

As an employee, I have found Areté Collective to be proactive, responsive, and a good partner in supporting sustainable development. From taking care of the golf courses, to proactively hiring the Hawaii Marine Animal Rescue to regularly monitoring by AECOS, and providing onsite wildlife education for staff and contractors, Areté has demonstrated a commitment to protecting the environment and natural and cultural resources in the larger development area.

Furthermore, Areté has validated its pledge to engage meaningfully with the community. They have listened to concerns and adjusted, including increasing setbacks, reducing the project footprint, and increasing the amount of native plants throughout the entire project.

For these reasons, I respectfully request that the Commission approve the Stream Channel Alteration Permit.

Mahalo,

Printed Name: William Foster

Signature: 

Date: 1/16/20

From: [Faith Wenzl](#)
To: [DLNR.CW.DLNR.CWRM](#); [Kariya-Ramos, Suzanne M](#)
Subject: [EXTERNAL] FW: Need Support
Date: Monday, January 19, 2026 2:50:40 PM

Aloha,

My name is Faith Wenzl, and I am submitting testimony as an interested community member regarding the Stream Channel Alteration Permit for the Kapa'a Bridge project.

I am not a technical expert, but I am someone who follows issues that affect our community and tries to understand the decisions being made on our behalf. After reviewing the information available and listening to the testimony presented, I believe this permit request deserves to be evaluated carefully and within its appropriate scope.

The application before the Commission is limited to work associated with the Kapa'a Bridge within an existing channel. It is not an approval for the broader Turtle Bay project, nor is it a reopening of previously accepted environmental determinations. In my view, expanding the scope of this permit review beyond what is being requested creates confusion and undermines the integrity of the established process.

Concerns about flooding, groundwater movement, and environmental impacts are important and should never be dismissed. However, these matters were addressed through the Final SEIS and supporting studies that were previously reviewed and accepted. I have not seen new information presented that would justify requiring another SEIS or delaying this specific permit.

The East Main Drain has long functioned as a constructed drainage system. While protecting natural resources is essential, it is also important to accurately characterize existing conditions when making regulatory decisions.

As someone with an interest in responsible planning and fair process, I believe that projects which have met regulatory requirements and undergone extensive review should be allowed to proceed. Continued delays without new evidence do not strengthen environmental protection and can erode public trust in the system.

For these reasons, I respectfully support approval of the Stream Channel Alteration Permit for the Kapa'a Bridge project.

Thank you for the opportunity to provide testimony and for your consideration.

Respectfully,

Faith Wenzl

To Whom It May Concern,

I am writing this letter in strong support of Arete Collective and their proposed bridge project over the East Main Drain on the North Shore of O‘ahu. I am a native of Hawai‘i and currently reside on the North Shore of Oahu, and I conducted extensive research for this project. This project was previously reviewed and approved by the appropriate commission in 2022, and I understand that the same approved scope, design, and execution plan will be followed and implemented as originally presented.

Arete Collective has demonstrated diligence and responsibility throughout the planning process. The project has already completed the required Environmental Impact Study, Cultural Inventory Study, and has received approval through the Final Supplemental Environmental Impact Statement (FSEIS). These efforts reflect a clear commitment to respecting Hawai‘i’s natural resources, cultural significance, and regulatory requirements.

The construction of this bridge will greatly enhance safe and responsible access for both kama‘āina and visitors to enjoy the natural beauty of the North Shore shoreline. The project will support community-focused amenities provided by Arete Collective, including parking, showers, gathering areas, fishing access, ocean maintenance, and educational and outreach programs. These features will help unite the community while promoting stewardship, education, and appreciation of Hawai‘i’s unique environment, culture, and natural beauty.

Arete Collective has consistently demonstrated its intent to fully comply with all State of Hawai‘i regulations and environmental protections. The organization remains committed to ensuring that no harm is caused to existing stream flow, ocean tides, or coastal currents throughout construction and beyond. Their continued cooperation with regulatory agencies and community partners further reinforces confidence in the responsible execution of this project.

This bridge project will benefit the many individuals and families who live in, work in, and visit the North Shore area by providing necessary infrastructure while preserving the character and integrity of the surrounding environment. It represents a thoughtful balance between access, safety, education, and environmental stewardship.

I am in full support of the Arete Collective bridge project as previously approved in 2022. I am confident that Arete Collective will continue to work collaboratively with the community, outreach groups, and regulatory agencies to ensure the successful construction of this bridge and the continued positive impact it will have on the North Shore of O‘ahu.

Thank you for your time and consideration.

Sincerely,
Sterling Carvalho

From: [Kori Napaa](#)
To: [DLNR.CW.DLNRCWRM](#); [Kariya-Ramos, Suzanne M](#)
Subject: [EXTERNAL] Agenda B1 – Testimony in Support of the Kapa'a Bridge SCAP
Date: Monday, January 19, 2026 4:16:58 PM
Attachments: [Outlook-qdkul5op.png](#)
[Outlook-zjmwboop.png](#)
[Outlook-di3ktzx0.png](#)
[Outlook-dsaaxf3y.png](#)
[Outlook-w2cjcfro.png](#)
[Outlook-1c3dqy3.png](#)

Aloha mai kākou,

My name is Kori Napa'a, and I submit this testimony in support of approval of the Stream Channel Alteration Permit (SCAP) for the Kapa'a Bridge project. I do so as a member of the public who values both environmental protection and adherence to established regulatory process.

At the outset, I respectfully emphasize the importance of evaluating this application within its legally defined scope. The permit before the Commission concerns work associated solely with the Kapa'a Bridge and related improvements within an existing channel. It is not an application for approval of the entire Turtle Bay development, nor does it reopen prior land use or entitlement decisions that have already been resolved through earlier proceedings.

Opposition testimony has asserted that flood hazard analysis, groundwater impacts, and habitat effects are insufficiently addressed, and that an additional Supplemental Environmental Impact Statement (SEIS) should be required. Based on the administrative record, these issues have already been analyzed through extensive environmental review, including hydrologic modeling, flood hazard assessments, and environmental impact analysis conducted as part of the Final Supplemental Environmental Impact Statement (FSEIS). That FSEIS was accepted and relied upon by the appropriate agencies and formed the basis for prior approvals, including the Commission's approval of the Kapa'a Bridge project in 2022.

Under established environmental review principles, a new or supplemental SEIS is warranted only where there is significant new information or changed circumstances that were not previously considered, and that would materially alter the analysis. No such information has been presented in connection with this SCAP application. Requiring a new SEIS in the absence of new facts would exceed the scope of this permit review and undermine the finality and predictability of the environmental review process.

It is also important to accurately characterize the project area. The East Main Drain is a constructed drainage facility designed to convey stormwater and manage flood flows. It does not constitute a natural stream supporting traditional or customary practices within the culvert area affected by the proposed work. Assertions of irreversible harm to a natural stream environment are therefore inconsistent with the documented conditions of the site and prior agency findings.

The current SCAP application is consistent with the project previously approved by this Commission and represents a necessary step in implementing that approval. Delaying or denying the permit based on objections unrelated to the permit's scope would effectively revisit settled matters and set an unreasonable precedent for infrastructure projects that have already undergone comprehensive environmental review.

For these reasons, and based on the existing record, I respectfully urge the Commission to approve the Stream Channel Alteration Permit for the Kapa'a Bridge project.

Mahalo Nui Loa for your careful consideration and for your continued service.

Respectfully submitted,

Mahalo,
Kori Napa'a



Kori Napa'a, MBA, LCSW

Chief Strategy Officer

(808) 293-6232 Phone

(844) 430-0218 Fax

56-117 Pualalea St., Kahuku, HI 96731



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 [Book time to meet with me](#)

Dear Commissioners,

Aloha,

My name is Brian Derby. I submit this testimony in support of approving the Stream Channel Alteration Permit (SCAP) for the Kapa'a Bridge project. I do so from the combined perspective of someone trained in regulatory review and administrative process, and as a retired Fire Captain who has spent a career assessing risk, flood hazards, infrastructure safety, and emergency response impacts.

From a legal and procedural standpoint, it is critical that the Commission's review remain limited to the scope of the permit application before you. This SCAP concerns specific work within an existing channel related to the Kapa'a Bridge. It is not a request to approve, modify, or expand the broader Turtle Bay development, and it should not be evaluated as such.

Concerns raised regarding flood hazards, groundwater movement, and environmental impacts are serious issues—particularly to anyone with experience in emergency management. However, these issues are not new, nor are they unresolved. They have already been evaluated through the Final Supplemental Environmental Impact Statement and supporting hydrologic and technical studies, which were accepted and approved after extensive review. No new data has been presented that would warrant reopening that process or delaying this permit.

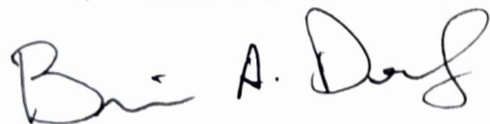
From a practical and safety-oriented perspective, the East Main Drain functions as an engineered stormwater conveyance system. Properly permitted improvements to infrastructure like this bridge are essential for managing storm events, reducing flood risk, and ensuring safe access for emergency vehicles and first responders. Delaying necessary infrastructure work does not increase safety—it increases uncertainty and risk during severe weather events.

The Commission previously approved the Kapa'a Bridge project in 2022. The permit before you is an implementation-level approval required to carry out that decision. Requiring a new or additional SEIS at this stage would exceed the scope of this permit review and create an unreasonable precedent for projects that have already satisfied environmental and regulatory requirements.

From both a regulatory and public safety standpoint, approving this permit supports responsible infrastructure planning, long-term risk reduction, and community resilience. I respectfully urge the Commission to evaluate this application based on the established record and approve the Stream Channel Alteration Permit as submitted.

Mahalo for your time, consideration, and continued service to our community.

Respectfully,

A handwritten signature in black ink, appearing to read "Brian A. Derby". The signature is fluid and cursive, with the first name "Brian" and last name "Derby" clearly legible, and "A." in the middle.

Subject: Agenda B1, Support of SCAP Approval for the Kapa'a Bridge Project

Dear Commissioners,

My name is Stewart Carvalho, a resident of Lā'ie, golf coach for Kahuku High School for the past 8 years, and avid beach user of Turtle Bay/keiki beach near the Turtle Bay golf course. I would like to offer my support to the Areté Collective's Stream Channel Alteration Permit. Approval of this permit will allow Areté Collective to build a crossing across the East Main Drain, a man-made, engineered drainage channel that conveys mauka runoff from the highway toward the shoreline. Seeing first hand almost on a weekly basis over the years of how the golf course and beach area is affected by the rain and tides, a project such as the one that is being proposed by the Areté Collective will not only enhance the golf course for players such as our Kahuku team, but also the beach area for our entire community and state.

As stated in 2022 when the same permit was approved, the project will not affect traditional or customary Native Hawaiian practices. This in and of itself, along with the major benefits it will provide to maintain the golf course for generations to come, will greatly enhance everyone's experiences. Additionally, it will provide access for the community to park closer to Keiki Pond with restrooms and showers. These public benefits, and many more, were requested by the community and outlined in the 1986 Unilateral Agreement.

This project is the result of more than 10 years of research and consultation. From the Cultural Impact Assessment and the Final SEIS to the more recent meetings with kūpuna, fishermen, cultural practitioners, environmental groups, and hundreds of residents, the former owners and now Areté Collective have consistently sought public input.

Today, Areté Collective has demonstrated its commitment to responsible development by increasing setbacks, reducing the project footprint, improving access to the shoreline, removing invasive ironwood trees, and planting native plants along the coastline and throughout the golf course

For these reasons and more, I personally, along with many other community members I have talked to about this project, 100% support what the Areté Collective have planned. I request for the approval of their permit to ensure the community's vision for this area and expect it comes to fruition.

Mahlo,

Stewart Carvalho

Subject: Agenda B1, Support of SCAP Approval for the Kapa'a Bridge Project

Dear Members of the Commission,

My name is Kekela Miller, a lifelong resident of Ko'olaupia, kumu hula, a member of the Ko'olaupia Neighborhood Board and Lā'ie Community Association, and an original member of the Kuilima North Shore Strategy Planning Committee (KNSSPC) which has reorganized again.

The KNSSPC is a community-led group formed in the 1980s to work with Turtle Bay's ownership to create the Unilateral Agreement of 1986 – an agreement outlining community benefits tied to the land and development triggers. Many of these benefits have not been realized until now, and I am so grateful to see this project underway.

With development now underway, the new road and bridge over the 'Ō'io Stream, also known as the East Main Drain, will finally provide improved access, a comfort station, parking, pathways, and other community-serving features we have long anticipated. We also look forward to new affordable housing and a childcare center made possible through Areté's development.

It is also important to note that the "stream" referenced in this permit is a man-made waterway conveying mauka runoff from the highway toward the shoreline. No traditional Native Hawaiian practices occur within the area. The Cultural Inventory Study and FSEIS found that no traditional and customary practices occur within the project area. This was confirmed by the Commission in 2022 and reiterated in the most recent staff report.

From my perspective, Areté has also met the requirements of the Ka Pa'akai Framework by documenting traditional and customary practices, analyzing impacts, and implementing appropriate mitigation. There has been extensive engagement for more than 40 years, and Areté voluntarily paused work for months to allow additional outreach.

As a result, mitigation has expanded to include increased setbacks, reduced building footprint and count, improved access, native landscape restoration, and ongoing monitoring.

Mahalo for considering and approving this permit application, which remains unchanged from when it was initially accepted. I am in full support.

Aloha,

Lucy Kekela Miller

Kekela Miller, Kupuna and Kuilima North Shore Strategy Planning Committee Member

From: [Nalia Toki](#)
To: [DLNR.CW.DLNRCWRM](#); [Kariya-Ramos, Suzanne M](#)
Subject: [EXTERNAL] Support of SCAP
Date: Tuesday, January 20, 2026 1:01:41 AM

Dear Commissioners,

Aloha,

My name is Nalia Toki, and I am a North Shore resident and local business professional. I am writing in support of approval of the Stream Channel Alteration Permit (SCAP) for the Kapa‘a Bridge project.

From a professional standpoint, I believe it is important that regulatory decisions remain focused on the specific permit application under review. This SCAP request is limited to work associated with the Kapa‘a Bridge within an existing drainage channel. It is not an application for the entire Turtle Bay development, and it should not be delayed or reconsidered based on issues that fall outside the scope of this permit.

Concerns raised regarding flooding, groundwater, and environmental impacts deserve careful consideration. However, these topics have already been evaluated through the Final Supplemental Environmental Impact Statement and related technical studies, which were reviewed and approved following extensive public and agency input. No new or material information has been presented that would justify reopening that process for this permit.

The East Main Drain is a constructed drainage system designed to manage stormwater. The proposed bridge work aligns with its engineered function and with prior approvals issued by the Commission, including the 2022 approval of the Kapa‘a Bridge project. Revisiting previously resolved issues at this stage would undermine regulatory certainty and create unnecessary delays for infrastructure projects that have already met established requirements.

From a business and community perspective, predictable and consistent permitting processes are essential. Timely approval of this permit supports infrastructure improvements, responsible planning, and continued investment that benefits local workers and the surrounding community.

I respectfully encourage the Commission to evaluate this application based on the existing record, the studies already completed, and the specific scope of the permit being requested, and to approve the Stream Channel Alteration Permit as submitted.

Thank you for your time and consideration.

Mahalo,

Nalia

From: [LaRissa Stant](#)
To: [DLNR.CW.DLNR.CWRM](#); [Kariya-Ramos, Suzanne M](#)
Subject: [EXTERNAL] Agenda B1 – Support for Approval of SCAP for Kapa'a Bridge
Date: Tuesday, January 20, 2026 6:21:31 AM

Dear Commissioners,

Aloha,

My name LaRissa Stant and I am a resident of the North Shore. I am submitting testimony in support of approving the Stream Channel Alteration Permit for the Kapa'a Bridge project.

I respectfully urge the Commission to evaluate this application within the proper scope of review. The SCAP request applies only to work associated with the Kapa'a Bridge within an existing channel. It is not an application for the entire Turtle Bay project and should not be delayed based on issues outside the permit's jurisdiction.

Opposition testimony has questioned whether flood hazards, groundwater flow, and habitat impacts have been adequately addressed. From my review, these issues were already evaluated through the Final SEIS and supporting hydrologic and environmental studies. No new information has been presented that would warrant reopening or repeating the SEIS process.

The East Main Drain is a constructed drainage feature designed to convey stormwater. Characterizing it as a natural stream with unresolved traditional or customary uses does not align with the documented conditions of the site or prior Commission findings.

This bridge project was previously approved by the Commission in 2022, and the current permit request is consistent with that approval. Delaying action to require another SEIS goes beyond the requirements of this permit and sets an unreasonable precedent for infrastructure projects that have already undergone extensive review.

Approving this permit will allow needed infrastructure improvements to proceed while supporting local jobs and long-term planning for the area. I respectfully ask the Commission to approve the Stream Channel Alteration Permit as submitted.

Thank you for your time and consideration.

Sincerely,

LaRissa Stant

Re: Agenda #

Subject: Testimony in Support of SCAP Approval for the Kapa'a Bridge Project

Aloha Commissioners,

I am submitting testimony in support of Areté Collective and the development plans as it relates to the Stream Channel Alteration Permit for the Kapa'a Bridge project.

As an employee, I have found Areté Collective to be proactive, responsive, and a good partner in supporting sustainable development. From taking care of the golf courses, to proactively helping the Hawaii Marine Animal Rescue to regularly monitoring by AECOS, and providing on-site wildlife education for staff and contractors, Areté has demonstrated a commitment to protecting the environment and natural and cultural resources in the larger development area.

Furthermore, Areté has validated its pledge to engage meaningfully with the community. They have listened to concerns and adjusted, including increasing setbacks, reducing the project footprint, and increasing the amount of native plants throughout the entire project.

For these reasons, I respectfully request that the Commission approve the Stream Channel Alteration Permit.

Mahalo,

Printed Name: Richard A. Hare

Signature: 

Date: 01-20-2026

From: [Alex Reinprecht](#)
To: [DLNR.CW.DLNRCWRM](#); [Kariya-Ramos, Suzanne M](#)
Subject: [EXTERNAL] Agenda B1 - Testimony in Support of the Kapa'a Bridge SCAP
Date: Wednesday, January 21, 2026 4:36:12 PM

Dear Commissioners,

Aloha,

My name is Alex Reinprecht. I submit this written testimony in support of approval of the Stream Channel Alteration Permit (SCAP) for the Kapa'a Bridge project.

From a regulatory and procedural standpoint, it is important that the Commission's review remain confined to the specific permit application before it. The SCAP request concerns discrete work within an existing channel related to the Kapa'a Bridge and does not constitute approval of, nor expansion upon, the broader Turtle Bay development. Issues unrelated to the scope of this permit should not be used as a basis to delay or deny action on this application.

The record reflects that environmental concerns raised in opposition—particularly those related to flood hazards, groundwater impacts, and habitat effects—were previously analyzed through the Final Supplemental Environmental Impact Statement and accompanying technical studies. The Commission accepted and approved the FSEIS, and no new evidence has been presented demonstrating changed circumstances or previously unconsidered impacts that would trigger the need for additional environmental review under applicable law.

Moreover, the East Main Drain has been consistently characterized in the administrative record as an engineered drainage system designed to convey stormwater. Regulatory determinations regarding this permit should be grounded in the documented function and condition of the channel, as opposed to characterizations that are inconsistent with prior agency findings.

The Commission approved the Kapa'a Bridge project in 2022. The current SCAP application is consistent with that approval and represents an implementation-level permit necessary to carry out previously authorized work. Requiring a new or supplemental SEIS at this stage would exceed the scope of the permit review and would set an unsound precedent for projects that have already satisfied environmental review requirements.

For these reasons, I respectfully submit that the application meets the applicable legal and regulatory standards and should be approved as submitted.

Thank you for your consideration and for your continued service.

Respectfully,

Me Ke Aloha Pumehana,

Alex Reinprecht

Zone Media LLC

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Testimony in Protest Against the Approval for the Kapa‘a Bridge Project

I am submitting a testimony against Arete Collective and their development plans.

As an employee I can testify that their development plans don't just disrupt the community but the ecosystems as well. It would be detrimental to the 'o'io population which sustains the people of this community. With the bridge, the 'o'io would not be able to swim upstream to feed and repopulate. They are building million dollar condos on what is home to many endangered native Hawaiian Birds as well as the albatross who already had to relocate closer to the golf course. The albatross are now more exposed to diminishing factors such as careless bypassers. They want to turn our land and beach into private housing. They could better use their time and money to build affordable housing for the people of Hawai'i. I testify that the Arete Collective did not consider how their actions would affect the environment. I can also testify that they had dug up Hawaiian 'iwi, and still continued on with their construction with no respect to Hawaiian burial grounds. I hope you will consider this and not let them build this bridge. As a native Hawaiian who was born and raised in this specific area, and as an employee, it is clear they have financial motives and do not care for the people, animals, and plants who grew here. Arete Collective continues to raise their prices to fund more and more of their projects and personal leisure. However their employees are still struggling to make ends meet. While I appreciate receiving a lunch bag as a Christmas bonus, I'd much rather see the destruction caused by Arete Collective be put to an end.

Me ka pono,
Jaclyn Tofa