

May19, 2026

Ms. Celia Shen
Harbors Planner, Planning Section
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Re: Public Comment to Draft EA Kawaihae Harbor Improvements 2026

Aloha Ms. Shen,

Thank you for the opportunity to submit questions and comments. We would appreciate an acknowledgment of receipt from your office for this document, along with a follow-up that addresses our questions and comments. If you find that our comments and concerns are valid and warrant consideration in your final EA, we would also appreciate a response on how those concerns will be addressed.

We are the Kawaihae Reef Organization LLC. My name is Hai On, and I am both an architect and the administrator of our website kawaihaereef.org. Our main goal is to educate the public about the Kawaihae Reef and the challenges it faces.



Colorize image of Kawaihae Reef pre harbor

Our organization was created to offer the public a website that highlights the area's history, wildlife inventory, and information to keep residents informed about this special place at Kawaihae. We established it in response to the Kawaihae Commercial Harbor Master Plan 2035, particularly concerning HDOT's planned improvements, including the construction of Pier 3.

We appreciate that this DEA mentions the coral reef in its historical background, unlike previous EAs. However, the document does not adequately describe the current richness and diversity of the reef community and downplays how much the reef has been destroyed multiple times. We estimate that more than 200 acres of coral reef were destroyed to build the harbor and the artificial peninsula, the Coral Flats.

Section 3.15, Secondary and Cumulative Impacts, does not cover the construction of Pier 3.

Cumulative Impacts

HAR § 11-200.1-2 defines cumulative impacts as incremental impact of the proposed action when combined with other past, present, and reasonably foreseeable future actions. This means individually minor impacts could become collectively significant.

According to the HAR 11-200.1-2 above, Pier 3, as mentioned in the Hawai'i Island Commercial Harbors 2035 Master Plan, would fall under "reasonable foreseeable future action."

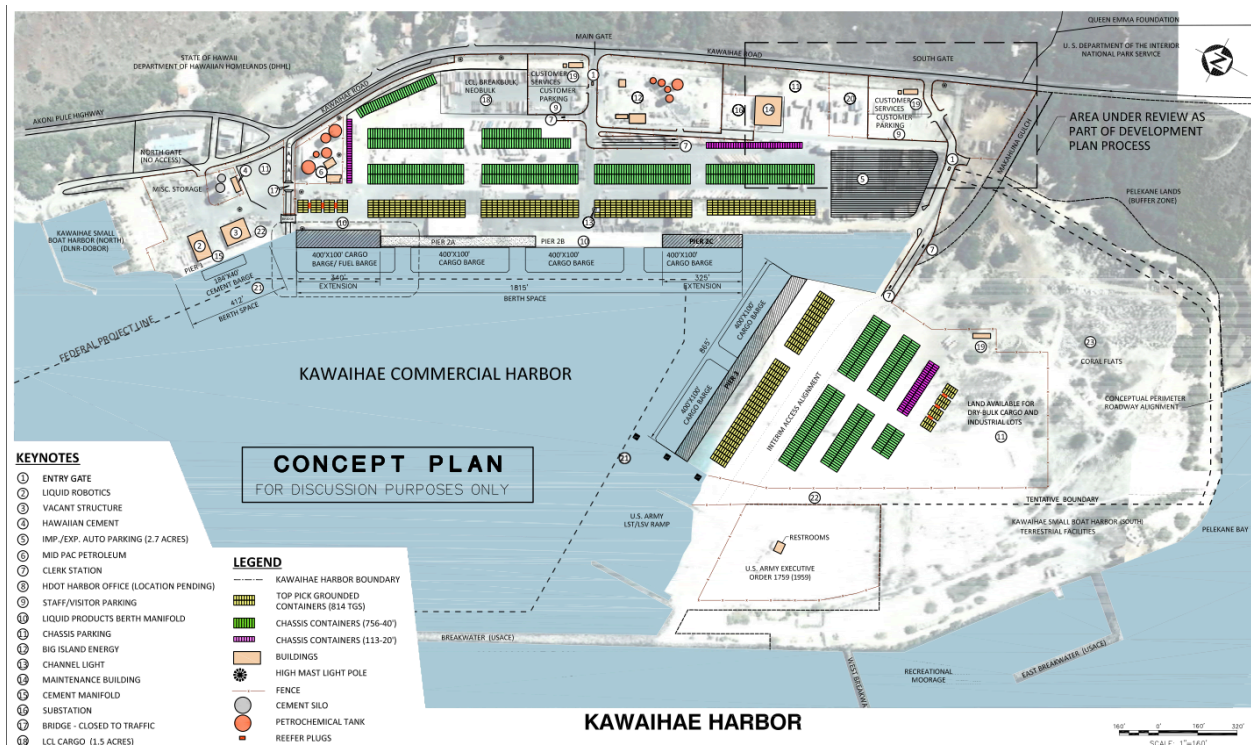
We understand that this DEA is limited to the Scope of Work presented, and comments and questions should be confined to it. However, the cumulative impact of future Pier 3 cannot be ignored. We believe that dredging more than five acres of coral reef and removing the Cultural Access to the beach west of APE 1 would likely violate federal coral protection requirements and would therefore be illegal. Mitigating five acres of coral reef by relocating it to another site would likely fail, as there is no suitable location to support and protect it.

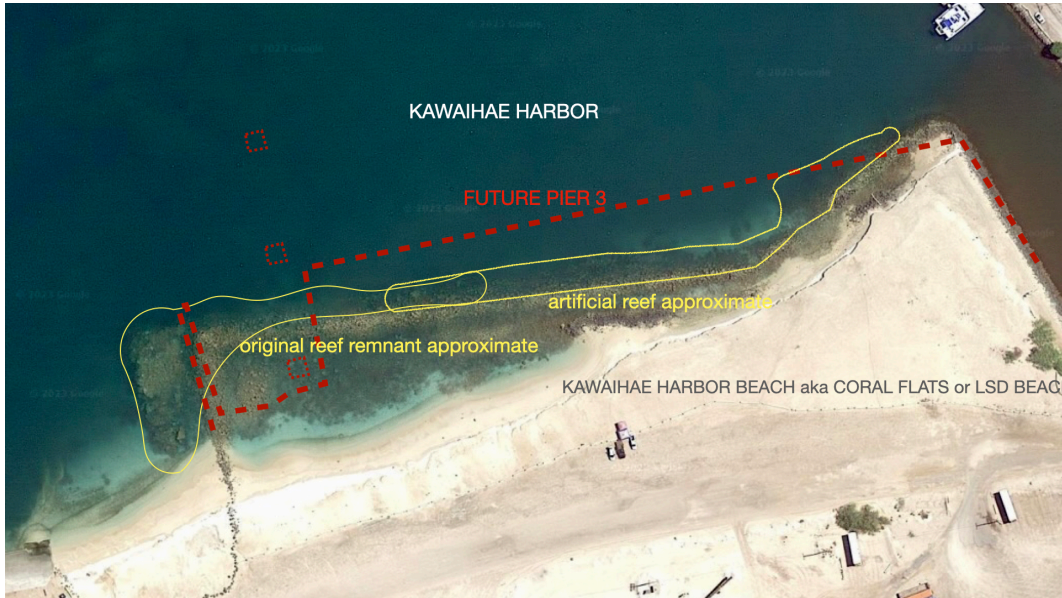
We are familiar with Executive Order 13089, Coral Reef Protection (PDF), which is still in effect states:

"calls for all federal agencies whose activities may affect coral reef ecosystems to:

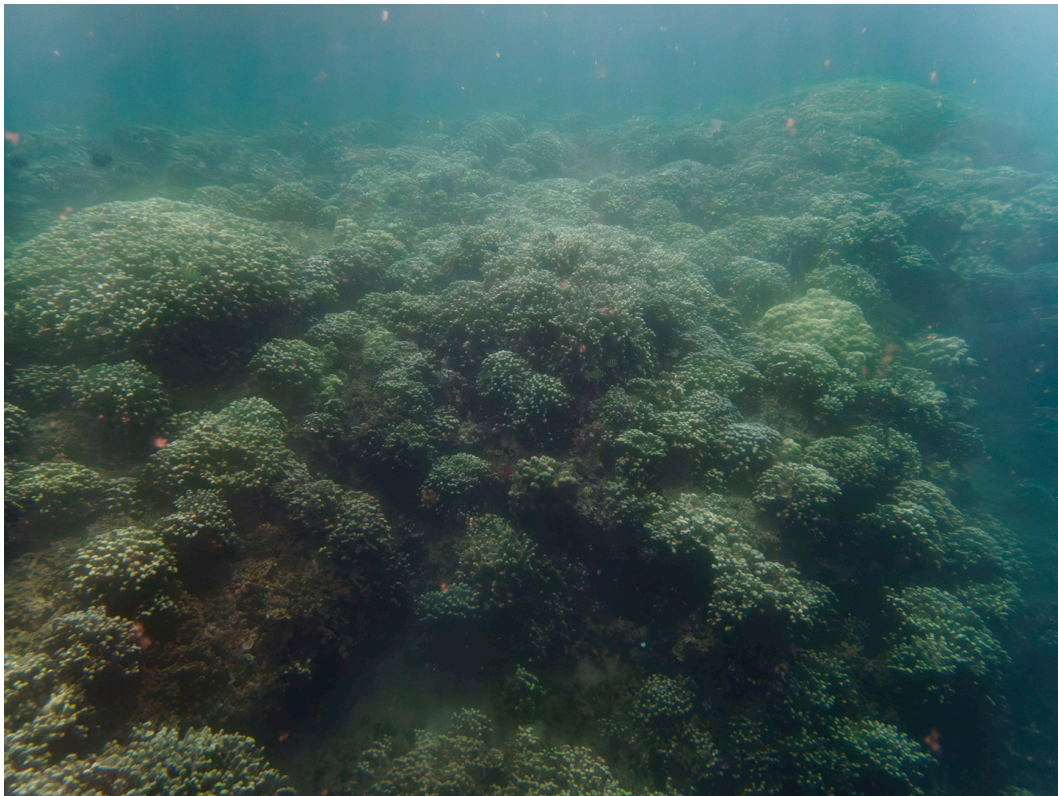
- *identify such actions;*
- *use their programs and authorities to protect and enhance coral reef ecosystems; and*
- *ensure that any actions they authorize, fund, or carry out will not degrade the condition of coral reef ecosystems"*

HDOT Harbors projects are primarily funded by the federal government. Therefore, we believe HDOT must redesign its current and future improvement projects and, at a minimum, update its master plan to meet federal funding requirements. Constructing a new Pier 3 at a different location will have cumulative effects on existing and upcoming projects.





Future Pier 3 overlay on the existing coral reef



Healthy coral reef in a location threatened by future Pier 3



Proposed relocation of future Pier 3 to protect the coral reef. This location requires minimal dredging and will satisfy coral reef protection per EO 13089

Building Pier 3 at its proposed site will destroy at least 5 acres of healthy reefs. To “protect and enhance the coral reef ecosystem,” a less damaging design for Pier 3 could involve a finger pier extending into the harbor basin, starting where Pier 2C is planned. Cities like Honolulu, Hilo, and others in the U.S. have similar piers due to limited space or other reasons. See the following example for the planned design of Hilo Harbor.

General comments on this DEA will follow.

1.2 Background

“Kawaihae Harbor has served as an important maritime facility since the 19th century.” This is incorrect. There was no Kawaihae Harbor before the deep draft harbor. Nautical charts from as early as 1931 do not show any harbor. (USC&GS 4166)

2.4.2 Construction Characteristics

“An existing warehouse building, located mauka of the Pier 2B cargo yard, will be renovated and repurposed to house the HDOT District office and maintenance functions.”

This renovation involves changing the occupancy from a warehouse to an office, which will definitely require architectural services, review, and approval by the Building Department under the IBC, and possibly by Zoning and Planning. Environmental cleanup may also be necessary, as it was previously used as an automotive repair shop.

2.4.3 Anticipated Government Permits and Approvals

Table 2-1 does not include the building permit required from the Hawaii County Public Works Building Department.

3.1 Historic and Archaeological Resources

Historic resources should include coral reefs. Coral reefs act as records of past marine ecosystems and human interactions. Kawaihae Reef, as a source of sustenance, may have motivated King Kamehameha to build the Pu’ukohola Heiau at this spot. More than ten thousand people have lived in the area and worked on the Heiau.

3.1.2 Cultural Resources

Affected Environment and Existing Conditions

Cultural Sites

“the pu’u (hills), mauna (mountains), and gulches that surround Kawaihae Harbor are important to Native Hawaiian cultural worldviews and traditions.”

Here again, the Kawaihae Reef is not mentioned, even though other natural landforms and man-made structures are recognized as important cultural and historical resources. We would like to see the coral reef highlighted not just as a source of past sustenance, but also as a meaningful cultural and historical resource. As noted earlier, the connection between the Heiau and the reef cannot be ignored. Similarly, Kawaihae Harbor wouldn’t exist without Kawaihae Reef.

According to the Kawaihae TH USACE 1949 report

“Factors influencing the determination of the plan. The harbor is on the west side of the island and thus protected from the north-easterly trade winds. Protection from the west and southwest winds, waves, and storms is partially afforded by the coral reef. The reef also provides a foundation for the proposed breakwater. “

We have a valid reason to emphasize the reef's importance in Kawaihae's and Hawaii's history, considering past destruction and ongoing neglect of the entire Kawaihae Reef. This is evident in the HCHMP 2025 (where the Reef is not mentioned at all) and other documents related to Kawaihae Harbor. Many people born after 1959 know little about what existed here before the harbor was built.

Our goal is to preserve the entire Kawaihae Reef and ideally protect it from further human-caused harm. We worry that diminishing the reef through words and history will ultimately cause more damage.

Since its creation, the harbor and its peninsula have negatively impacted the areas around Pu'ukohola Heiau by disrupting natural currents and tides that used to prevent Pelekane Bay from filling with sediment. By March 2026, the bay had transformed into land. Whether harbor projects are ongoing or planned, the harmful effects on natural and cultural heritage resources continue.



Pelekane Bay with new baymouth bar mid March 2026



Pelekane Bay view from the new baymouth bar, 3/31/2026



View of Pelekane Bay from shore, 3/31/2026

3.2.2 Coral Communities

Affected Environment and Existing Conditions



Montipora capitata

Red rice coral, *Montipora capitata* is listed as Threatened (NT) on the IUCN Red List colonies can grow up to 1m in certain areas on the pylons or vertical substrates.

This is just a small example illustrating how rich marine life has colonized artificial environments. New species, such as sponges and nudibranchs, are frequently discovered and documented. Several sea slug species were first recorded in Hawaii at Kawaihae Harbor.

Offshore coral colonies within the harbor have suffered multiple groundings. Four times by the same sailboat, Hulakai, which was demolished after its last grounding.

<https://kawaihaereef.org/hulakai-s-fourth-grounding/>

Kawaihae Harbor did not report some groundings like those above to DLNR; it was the citizens' initiative to report them.

Normal harbor operations, such as traffic, impact the coral ecosystem by mechanically moving sediment from the bottom to the surface and into the inner coral reef. Tugboat activity causes sediment upwelling, which is most intense during periods of consistent, strong offshore winds.

Potential Impact and Mitigation Measure

"No in-water work and no resulting loss of coral is planned as part of this Project".

On April 2025, at Pier 2, we observed a large opening cut through the structural floor, with temporary floating platforms in the water below the work area. It appeared that this project might not be classified as "in-water," but even on this scale, the water was likely affected. There didn't seem to be any netting to catch construction debris or solid waste that could fall into the ocean at this stage. What happened to waste and debris like concrete during demolition and construction?



Opening at structural floor/deck construction at Pier 2, Kawaihae Harbor , 4/3/2025



Free floating platform over shallow coral reef, 6/12/2025

On June 12, 2025, two of those platforms were seen floating freely along the break wall west of the harbor. Long, 2-3 inch blue fasteners remained on the surface of these platforms, suggesting they most likely came from the construction area beneath Pier 2. The coral reef along the break wall is shallow and remains pristine, despite multiple groundings and mishaps.

We could not confirm whether the floating platforms that broke free caused damage as they traveled across parts of shallow coral reefs. However, we can conclude that the possibility of impact on the coral reef, although unlikely on paper for a not-in-water project, may have occurred due to human errors.

Discussion

When will HDOT Harbors, with federal funding and EO 13089 in effect, “*use their programs and authorities to protect and enhance coral reef ecosystems*”? What plans will be implemented to fulfill this mandated obligation?



Two floating temporary construction platforms broke free and ended up on a small beach inside the harbor, 6/12/2025

3.2.3 Marine Species

Affected Environment and Existing Conditions

Seventeen hawksbill sea turtles, *Eretmochelys imbricata*, have been observed in the harbor since 2019. Most were seen along the pylons of the main piers. Sightings included 18 in Honokohau Harbor, bringing the total to 35 for the Island of Hawai'i. This accounts for about a third of the 115 Hawksbills recorded around Hawai'i Island. Recent data indicate that hawksbill sea turtles prefer harbors because they offer protected habitats rich in sponges. Sponges favor vertical surfaces like pylons under piers.

Potential Impacts and Mitigation Measures

"The Project does not involve in-water work and is not anticipated to impact marine species."

Five out of seventeen, or 30%, of observed hawksbills were injured by fishing hooks or lines. BMPs seem reasonable for reducing potential impacts, but it is also wise to consider that contractors or dock workers fishing from these piers might accidentally harm these endangered animals. We want to imply that these endangered animals could be harmed by human fishing activity unless there is greater awareness of their presence and habitat.



Injured hawksbill turtle with large hook , 9/30/2024

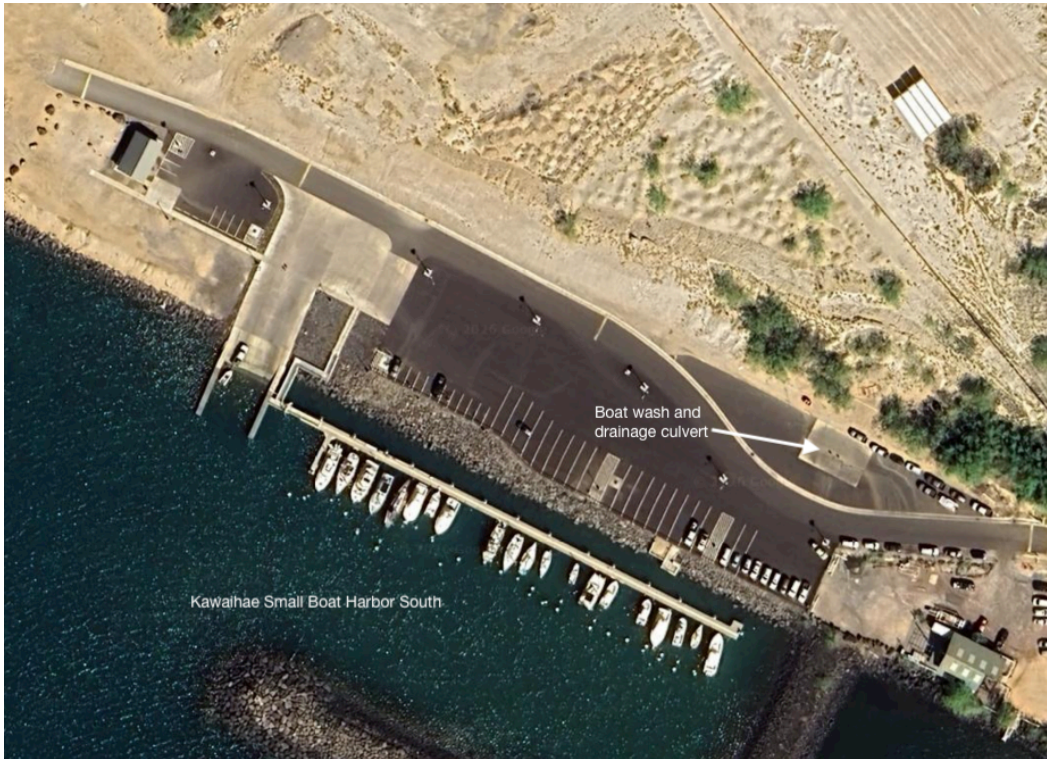
Water visibility near the piers is poor due to boat traffic. In this area, next to and beneath the piers' edges, Hawksbills were observed lingering along and between the pylons for hours, feeding on sponges. The contractors are unlikely to see these animals underwater; however, turtles do surface to breathe infrequently. The general public is restricted from these areas.

We are not aware of any restrictions on fishing from those piers. If HDOT Harbors aims to be a good steward of the endangered species on its property, a simple restriction on line fishing off the piers would be a helpful first step now, whether during this project or later.

3.9.1 Drainage and 3.9.3 Wastewater Treatment and Disposal

We appreciate that this DEA addresses stormwater impacts throughout Kawaihae Harbor. The project will involve extensive paving and resurfacing. We are unsure whether drainage and surface runoff from these paved areas will reach the ocean. If there are no plans to redirect surfaces that could carry pollutants such as oil or other toxic substances from vehicles away from the ocean, HDOT should consider updating the drainage design to prevent surface pollutants from entering the ocean.

For example, the Small Boat Harbor South has a boat wash with grading and a drain to capture pollutants from vehicles and boats. We do not know how this wastewater collection system handles the pollutants after collection.



Kawaihae Small Boat Harbor South with boat wash, drainage, and collector system.

Kawaihae Harbor issues for discussion outside of this project

Again, we appreciate the opportunity to provide comments to HDOT Harbors. We will highlight non-project-related items for discussion that we believe are important to the harbor's function.

Discussion

Cultural access

The general attitude of HDOT Harbors toward the public, based on my experience with Harbor Master Jeff Hood, is that, to be blunt, the public should be thankful just to be allowed to use the Coral Flats and access the ocean. This is unacceptable because HDOT is, first and foremost, a Federal/State agency funded by taxpayers and serving the public.

Luckily for the harbor, the public only wanted access to the ocean, even after the harbor replaced a mile-long beach and partially destroyed the reef, a vital subsistence resource for the community.

Health and Sanitary Issues

There are no public restrooms at Coral Flats. The nearest facilities are about half a mile away from the harbor beach. We contacted the health department and learned that they cannot provide restrooms because the area falls under HDOT Harbors' jurisdiction. Meanwhile, the military always has running water and porta-potties, with the number increasing as more soldiers arrive. All are behind locked gates and are not open to the public.

Human waste has caused health and water quality issues since 1959, when the harbor was built. The public needs access to running water and restrooms; it is a basic right for those using public spaces.

HDOT Harbors could dedicate a small part of all improvement funds for paving to create more comfortable conditions for containers and truckers, and to add a few restrooms and showers for the public.

Coral Reef Health

Storm runoff and sediment

The last two flash floods—one on May 10, 2024, and the most recent on March 14, 2026—were notable for their destructive impact on the infrastructure of the artificial land. In 2024, a section of the paved road to the Small Boat Harbor South was washed out. The March 2026 flash flood further enlarged the outflow and eroded more land.



Road to Small Boat Harbor South damaged from 5/10/2024 flashfloods



Paved access to Coral Flats is inundated with sediment and erosion from the 5/10/2024 flashfloods.

In recent years, we have seen the harbor crew repeatedly clearing sediment at the low point on the entrance to Coral Flats from the south harbor entrance, at least six times annually. The DEA acknowledged this issue at this location. With the road to the south small boat harbor damaged, the main route for all public traffic is now through this area.

3.3 Surface Waters and Groundwater Potential Impacts and Mitigation Measures

“Because the site is adjacent to coastal waters, additional precautions will be implemented as necessary to prevent sediment discharge into Kawaihae Harbor. If work occurs in proximity to the shoreline, temporary turbidity controls (e.g., sediment curtains) may be used as appropriate. Equipment used near water will be inspected and cleaned to prevent pollutant or invasive species introduction.”

These mitigation measures seem to be BMPs that the Harbors should implement permanently. It does not seem that the HDOT Harbors have any measures in place to prevent the coral reefs inside the harbor from being inundated with sediment. It is unclear why protecting coastal waters to prevent sediment discharge applies only during construction. The harbor was built exactly where the exit points of at least two major gulches are located.

As described in Section 3.6.3 Flood Hazards:

“Although the Project area is mapped outside the 1% annual chance floodplain, Kawaihae Harbor and the Coral Flats area have experienced localized flooding during high-intensity rainfall events. A known flooding concern involves sediment accumulation at culverts southeast of the harbor facility, which can obstruct drainage and redirect runoff onto Kawaihae Road and into portions of the harbor yard. The natural overland flow path across Coral Flats also contributes to periodic inundation during heavy storm events.”

3.9.1 Drainage

“In addition, during heavy rain events sediment enters Kawaihae Harbor which may negatively impact operations (Element Environmental, LLC 2025).”

In the public eye, it’s clear that frequent flooding and sediment runoff cause serious problems for the harbor’s infrastructure and operations. This DEA explicitly recognizes these issues.

The DEA states that the harbor's main office is being relocated due to flash floods. During one such event in May 2024, sediment accumulated on the fences around the south entrance and near the office was waist-high, roughly three feet above the road. This shows that the office building and its yard were submerged under at least three feet of fast-moving floodwaters.



Large boulders deposited on container yard at south gate and adjacent to harbor office, 5/14/2024

The photo above shows a high volume of fast-moving floodwater that deposited rocks and large boulders across the container yard.

The importance of proper storm and runoff management planning is vital, not only for the harbor’s operations and public safety but also for the health of marine and coral ecosystems.

1.5.2 Purpose

“2. Provide a safe and level surface within the cargo yard to improve efficiency and operating conditions.”

6. Support applicable state and county policies that call for the safe, efficient, and comfortable movement of goods (Hawai'i Island General Plan 2005)”

These two statements expose superficial needs, especially “*comfortable movement of goods,*” which do not tackle more urgent issues like chronic flooding and sediment problems.

Where are the plans to prioritize handling natural events that could shut down the harbor's operations?

Not In Water

Discussion

We notice that the term “not in-water” is often used in the DEA related to this project. This seems to reassure the public that this and any harbor project labeled with this term would have minimal impact on the marine environment where the harbor is located. However, based on long-term observation, historical evidence, and HDOT Harbors’ culture and attitude, we understand that such reassurance is superficial and insincere.

The decision to dredge the largest coral reef on the island to build a harbor, mainly for the benefit of a few at the expense of many, including the reef ecosystem, will always have a negative cumulative impact on the marine environment.

The reef outside the harbor’s breakwall has not yet recovered since the construction of the harbor began in 1957.

Pelekane Bay, situated at the base of Hawaii's most important Heiau, is now land.

Soon, a beloved beach in Coral Flats will be replaced by a container yard. The reef beyond this beach, which has survived multiple dredging events in the harbor basin, will be dredged to thirty-five or forty feet to make way for Pier 3. Unless HDOT Harbors chooses a less damaging approach required by law, such as building a finger pier away from the reef.

New 16 acres of reinforced concrete will increase surface water runoff. We understand this by examining how the built environment, like cities, influences flooding. But where will all that water, which can carry pollutants from cargo yards and parking lots (there are always oil patches in any parking space), go if there’s no plan to collect and divert it away from the ocean?

We appreciate that BMPs will be considered and implemented to reduce potential runoff during construction. However, we often see harbor employees spraying herbicide along the same drainage channel that flows directly into the ocean.

The public has “cultural access” to the Coral Flats and surrounding waters, but there have never been restrooms or running water. This raises health concerns for visitors and affects the water quality where they swim. For the past few years, the water supply to public restrooms at the SBHS and the Surf Park has been cut off due to storms like the one in May 2024. Besides the military’s water supply, the rest of the peninsula has been without water. This situation could last up to six months. This is neither comfortable nor efficient for taxpayers who use the facilities and pay for the harbor improvements.

Another issue to consider regarding health and sanitation concerns is that a small number of houseless people live within the harbor and on DLNR property. They are getting by as best as they can, and it is a safe place for them. Stigmatizing them is not acceptable; however, providing public restrooms and running water for washing and bathing is not too much to ask, given the millions of dollars Matson is entitled to in benefits from HDOT Harbors. Investing in your local environment and people is important.

Summary

We sincerely appreciate the opportunity to comment on the DEA and the Harbor as a whole. There is no process for citizens to submit suggestions for basic public amenities, such as restrooms and running water. There is certainly no other way to oppose the destruction of a coral reef and a beach that generations of Hawaiians have enjoyed.

Our main concerns, based on our comments, are as follows:

- The Cumulative Impact per HAR § 11-200.1-2 clearly applies to the construction of Pier 3 in Phase Three of Kawaihae Harbor, as outlined in HCHMP 2035. Phase three is the most expensive part of the harbor projects. Based on the language in this DEA, which explains the purpose and need to grow and expand to improve Matson’s comfort and efficiency, we expect HDOT Harbors to put in the same level of effort to achieve this goal. Without redesigning Pier 3 as a finger pier extending from the proposed Pier 2C and away from the coral reef, HDOT Harbors will destroy 5 acres of that reef, erase a beloved beach, and violate coral protection laws.
- Kawaihae Harbor’s documents or previous EAS often omitted the Kawaihae Reef. However, this DEA acknowledged the role of the coral reef at this harbor but minimized its importance as a cultural and historical resource. The destruction of over 200 acres of coral reef was so extensive that it should not have been overlooked. The location of Pu’ukohola Heiau, next to the reef, was likely intentional, and the harbor could not exist without the reef. Without recognizing the reef’s significance, it would be easier to neglect its conservation and protection.
- The number of Hawksbill sea turtles observed and documented at seventeen since 2019 was not conclusive because these observations were made by us infrequently, maybe three or four times a year. There could be many more that frequent the harbor. The data compiled by Hawaiian Hawksbill Conservation suggest that hawksbill turtles prefer the habitat provided by harbors, both here and in Kona. Other endangered or threatened species were also observed in the harbor basin. The harbor environment acts as a nursery and is also home to larger-than-normal-sized species.
- Storm runoff and flash floods clearly damage infrastructure at both the harbor and the nearby DLNR property. It’s evident that these events have become more frequent in recent

years. A road was washed away, and there are no plans to repair it. Pelekane Bay has turned into land. We believe that BMPs should be implemented as part of a comprehensive, long-term plan to better address or reduce these issues, rather than relying on continuous patchwork fixes. This should be a priority project for HDOT Harbors and DLNR.

- Any project at the harbor, whether in water or not, can impact the marine environment and coral reef ecosystems. It all began with the decision to destroy the coral reef at this site. Harbor construction caused irreversible environmental damage. Conversely, the environment—through storm runoff and flash floods—damages the built environment because it is located at the base of deep gulches from the watershed above.
- This project with acres of reinforced concrete will only speed up water runoff into the ocean unless measures are taken to collect and separate pollutants.

Please understand that we love and want to protect the remaining coral reef, beach, and ocean access after so much was lost due to harbor construction.

Access to the ocean is a right. We are dedicated to protecting the Kawaihae Reef and will advocate for its conservation because it is the right thing to do.

Mahalo,



Hai On, Kawaihae Reef Organization LLC

Additional Information about the Harbor and Kawaihae Reef

- Video: [A brief visual history of Kawaihae Harbor and the destruction of Kawaihae Reef](#)
- Video: [Kawaihae Harbor Beach Reef Survey Raw](#) (future Pier 3 will destroy this coral reef)