

Calvert G. Chipchase
1000 Bishop Street, Suite 1200
Honolulu, HI 96813
Direct Line: (808) 521-9220
Direct Fax: (808) 540-5021
Email: cchipchase@ca-des.com

March 2, 2026

VIA E-MAIL michael.cain@hawaii.gov

Michael Cain, Administrator
Office of Conservation and Coastal Lands (OCCL)
Department of Land and Natural Resources
1151 Punchbowl St. #131
Honolulu, Hawai'i 96813

Re: Suggested changes to the proposed amendments to HAR 13-5

Dear Mr. Cain:

Eric Robinson, Esq. of Starn O'Toole Marcus & Fisher, Andrew Bohlander of Sea Engineering, Inc., and I respectfully submit the attached suggested changes (redlined) to the proposed amendments to Hawai'i Administrative Rules Chapter 13-5 released by OCCL on April 30, 2024.

We believe these suggested changes are necessary to conserve and protect natural and cultural resources without damaging the economic vitality of the state. The suggested changes also align terms across provisions and with Hawai'i Revised Statutes Chapter 205A.

Please do not hesitate to contact me to discuss the suggested changes.

Very truly yours,



Calvert G. Chipchase
for
CADES SCHUTTE
A Limited Liability Law Partnership

cc: Eric S. Robinson, Esq.
Andy Bohlander