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Director, Office of Planning

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Director, Kaua'i DP
The Adjutant General
Manager, CZM

**STATE OF HAWAII
HAWAII CLIMATE CHANGE MITIGATION & ADAPTATION
COMMISSION
POST OFFICE BOX 621
HONOLULU, HAWAII 96809**

**Testimony of
Anukriti Hittle
Coordinator, Hawaii Climate Change Mitigation and Adaptation Commission**

**Before the House Committees on
ENERGY & ENVIRONMENTAL PROTECTION
and
WATER, LAND & HAWAIIAN AFFAIRS**

LATE

**Friday, March 13, 2020
11:00am
State Capitol, Conference Room 325**

**In consideration of
SENATE BILL 2060, SENATE DRAFT 2
RELATING TO COASTAL ZONE MANAGEMENT**

Senate Bill 2060, Senate Draft 2 proposes to amend coastal zone management laws to further protect against impacts of sea level rise and coastal erosion; and require the Climate Change Mitigation and Adaptation Commission to submit a proposal for a State of Hawaii supplemental insurance program for properties within the State subject to climate change impacts to the Legislature prior to the Regular Session of 2021. **On behalf of the Hawaii Climate Change Mitigation and Adaptation Commission (Commission), I support the intent of this measure, and offer the following comments.**

The Hawaii Climate Change Mitigation and Adaptation Commission “recognizes the urgency of climate threats and the need to act quickly. It promotes ambitious, climate-neutral, culturally responsible strategies for climate change adaptation and mitigation in a manner that is clean, equitable and resilient.” The Commission, established by Act 32 Session Laws of Hawaii 2017 to uphold the United States’ pledges under the Paris Agreement, is the coordinating body for policies on climate change mitigation and adaptation for the State. It is a high-level multi-jurisdictional body that guides the priorities of the state’s climate response. Co-chaired by the Department of Land and Natural Resources and Office of Planning, it consists of 20 members—chairs of four legislative committees, and executive department heads at the county and state levels.

At its September 2018 meeting, the Climate Commission agreed to five priority recommendations for countering impacts of sea level rise, including requesting that all new development, redevelopment, and modifications be directed away from beach areas; urging counties to incorporate the 3.2 foot sea level rise exposure area (SLR-XA) as detailed in the Hawaii Sea Level

Rise Vulnerability and Adaptation Report (Hawaii Sea Level Rise Report) into their general and community plans; and bring resources to assist in planning and implementing for sea level rise and other climate related impacts.

For SECTION 12, in order to clarify the direction given to the Commission, I recommend replacing the current language with the following (underscored text is new) language: “The Climate Change Mitigation and Adaptation Commission shall research and submit a report on options for a state supplemental insurance program for properties within the State subject to climate change impacts to the Legislature no later than twenty days before the convening of the Regular Session of 2021.”

Thank you for the opportunity to testify on this measure.

DAVID Y. IGE
GOVERNOR OF
HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA
FIRST DEPUTY

M. KALEO MANUEL
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

Testimony of
SUZANNE D. CASE
Chairperson

Before the House Committees on
ENERGY & ENVIRONMENTAL PROTECTION
and
WATER, LAND & HAWAIIAN AFFAIRS

Friday, March 13, 2020
11:00am
State Capitol, Conference Room 325

In consideration of
SENATE BILL 2060, SENATE DRAFT 2
RELATING TO COASTAL ZONE MANAGEMENT

Senate Bill 2060 Senate Draft 2 proposes to: 1) amend coastal zone management laws to further protect against impacts of sea level rise and coastal erosion. requires new development to plan for the impacts of projected sea level rise and restricts development in areas significantly affected by coastal hazards and projected sea level rise; 2) amend policies and objectives related to coastal zone management to reduce residential exposure to coastal hazards and protects state and public shoreline access; 3) define “coastal hazards”; and 4) increase the minimum shoreline setback. **The Department of Land and Natural Resources (Department) supports this measure and offers the following comments.**

In 2017, the Legislature passed legislation which Governor Ige signed into law as Act 32, establishing the Hawaii Climate Change Mitigation and Adaptation Commission (Climate Commission). Act 32 also established a Climate Change Mitigation and Adaptation Coordinator (Climate Coordinator) position. The Climate Commission and Climate Coordinator are housed within the Department’s Office of Conservation and Coastal Lands.

In their September 2018 meeting, the Hawaii Climate Change Mitigation and Adaptation Commission (Climate Commission), on which the Chair of the Board of Land and Natural Resources is a co-chair, agreed to five priority recommendations for countering impacts of sea level rise, including requesting that all new development, redevelopment, and modifications be directed away from beach areas; urging counties to incorporate the 3.2 foot sea level rise exposure area (SLR-XA) as detailed in the Hawaii Sea Level Rise Vulnerability and Adaptation Report (Hawaii Sea Level Rise Report) into their general and community plans; and bring resources to assist in planning and implementing for sea level rise and other coastal hazards.

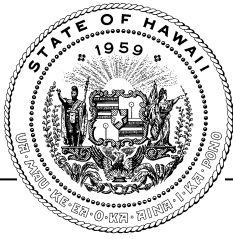
Further, the Hawaii Sea Level Rise Report, accepted by the Climate Commission in December 2017, recommendations include that the State support sustainable and resilient land use and community development; seek opportunities to development outside the SLR-XA; develop shoreline (i.e., beach and dune) protection, conservation, and restoration priorities and guidelines; integrate sea level rise vulnerability considerations into the Hawaii Coastal Zone Management Act (Chapter 205A, Hawaii Revised Statutes); and enable “legacy” beaches to persist with sea level rise.

It is the mission of the Department to manage public lands and ocean resources, including beaches throughout the State. The Department is very much at the forefront of addressing impacts related to coastal erosion and beach loss in Hawaii. Beaches are central to our culture and economy. As described in Section 1 of the bill, our beaches are being lost at alarming rates due to natural processes and human impacts including sea level rise and concentrated shoreline development, threatening alongshore public access and upland development.

When shore-front property and homes are threatened by coastal erosion and flooding, the Department often faces intense pressure from landowners to permit erosion-protection structures such as seawalls and rock revetments. The science is clear that installing coastal armoring on a chronically eroding beach leads to beach narrowing and loss and increased erosion to unprotected neighboring properties. Increasing protection for beaches and other coastal resources, as well as strengthening prohibitions against seawalls and revetments, and strengthening zoning controls and shoreline building setbacks through the proposed updates to Chapter 205A, Hawaii Revised Statutes, are critical if we want to allow our beaches to persist with sea level rise while improving resilience of our beachfront communities.

The Department supports a suggestion by the Climate Change Coordinator for SECTION 10 in which she recommends replacing the current language with the following (underscored text is new) language: “requiring the Climate Change Mitigation and Adaptation Commission to research and submit a report on options for a state supplemental insurance program for properties within the State subject to climate change impacts to the Legislature prior to the Regular Session of 2021.

Thank you for the opportunity to comment on this measure.



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DAVID Y. IGE
GOVERNOR

MARY ALICE EVANS
DIRECTOR
OFFICE OF PLANNING

Statement of
MARY ALICE EVANS
Director, Office of Planning
before the
**HOUSE COMMITTEES ON ENERGY & ENVIRONMENTAL PROTECTION
AND
WATER, LAND, & HAWAIIAN AFFAIRS**
Friday, March 13, 2020
11:00 AM
State Capitol, Conference Room 325

in consideration of
SB 2060 SD2
RELATING TO COASTAL ZONE MANAGEMENT.

Chairs Lowen and Yamane, Vice Chairs Wildberger and Todd, and Members of the House Committees on Energy & Environmental Protection, and Water, Land, & Hawaiian Affairs.

The Office of Planning (OP) serves as the lead agency of the Hawaii Coastal Zone Management (CZM) Program, which was approved by the federal government in 1978. The OP **supports SB 2060 SD2** and respectfully provides following recommendations:

1. **Page 4, line 11-14**, unlike land use policies including state land use districts, county general plans, development plans and zoning, the Hawaii CZM Program does not serve as a mechanism to enable development or increase building surface area as stated in the findings of SB 2060 SD2. The OP recommends amending the statement as follows:

The average building surface area has increased by twenty per cent [~~following the establishment of the State's coastal zone management program~~] since the 1970s and, combined with sea level rise, this development increases the likelihood of mass structural failure and deposit of debris on public beaches.

2. **Page 35, lines 17-20, and page 36, lines 1-5**, the OP recommends that Section 12 and Section 13 may be more appropriately included into SB2162 SD2, which directs the Climate Change Mitigation and Adaptation Commission to accomplish specific tasks and makes an appropriation.

Further, the OP recommends that the language be amended to read as follows:

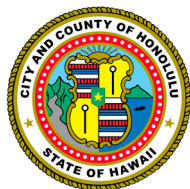
The Hawaii climate change mitigation and adaptation commission shall [~~submit a proposal for~~] research implications of a state supplemental insurance program for properties within the State that are subject to [~~climate change~~] flooding impacts to the legislature no later than twenty days before the convening of the regular session of 20[~~21~~]22.

Thank you for the opportunity to testify on this measure.

OFFICE OF CLIMATE CHANGE, SUSTAINABILITY AND RESILIENCY

CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 9TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 768-2277 • EMAIL: resilientoahu@honolulu.gov • INTERNET: www.resilientoahu.org



KIRK CALDWELL
MAYOR

JOSHUA W. STANBRO
EXECUTIVE DIRECTOR &
CHIEF RESILIENCE OFFICER

FRIDAY, MARCH 13, 2020, 11:00 AM

STATE OF HAWAII
HOUSE COMMITTEE ON ENERGY & ENVIRONMENTAL PROTECTION
HOUSE COMMITTEE ON WATER, LAND, & HAWAIIAN AFFAIRS

**TESTIMONY ON SENATE BILL 2060, SD2
RELATING TO COASTAL ZONE MANAGEMENT**

BY,

JOSHUA STANBRO
EXECUTIVE DIRECTOR AND CHIEF RESILIENCE OFFICER
OFFICE OF CLIMATE CHANGE, SUSTAINABILITY AND RESILIENCY

Dear Chair Lowen, Chair Yamane, and Members of the Committees:

The City and County of Honolulu (City) Office of Climate Change, Sustainability and Resiliency (Resilience Office) **supports** SB2060, SD2, which amends coastal zone management policy to further protect against impacts of sea level rise, coastal erosion, and other coastal hazards, and requires the Climate Change Mitigation and Adaptation Commission to submit a proposal to the Legislature for a state supplemental insurance program for properties within the state subject to climate change impacts.

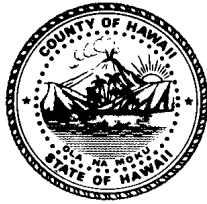
As climate change drives sea level rise and other coastal hazards, the City anticipates an increase in the number of property owners seeking variances to armor coastal properties. It is clear that armoring our sandy beaches leads to beach loss and increased erosion to nearby unarmored properties, as has been observed and documented. The Resilience Office supports the updates proposed in this bill to strengthen the state's coastal zone management policies. These updates are critical for the protection of coastal resources and public safety in the face of climate impacts and coastal hazards.

Thank you for the opportunity to testify in support of SB2060, SD2.

Harry Kim
Mayor

Roy Takemoto
Managing Director

West Hawai'i Office
74-5044 Ane Keohokalole Hwy
Kailua-Kona, Hawai'i 96740
Phone (808) 323-4770
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County of Hawai'i
PLANNING DEPARTMENT

Michael Yee
Director

Duane Kanuha
Deputy Director

East Hawai'i Office
101 Pauahi Street, Suite 3
Hilo, Hawai'i 96720
Phone (808) 961-8288
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March 12, 2020

Testimony by
MICHAEL YEE
Director, County of Hawai'i Planning Department
before the
Committee on Energy & Environmental Protection
and the
Committee on Water, Land & Hawaiian Affairs

Friday, March 13, 2020, 11:00 A.M.
State Capitol, Conference Room 325
In consideration of
SB 2060, SD2
Relating to Coastal Zone Management

Thank you for the opportunity to comment on SB 2060. The current bill proposes some significant amendments to the regulation of the coastal zone that raise critical questions and concerns:

205A-2(c)(5)(B) Policies: We are concerned with the deletion of "coastal dependent development" and the addition of "residential and commercial development." The original intent of this section was to ensure that any coastal dependent development is placed and designed appropriately. Residential and commercial development are not coastal dependent.

205A-2(c)(9)(B) Policies: We oppose limiting this policy to sites with sandy beaches. Hawai'i Island has many vulnerable shorelines that are not beaches, and we need the authority to prohibit hardening structures generally.

205A-22 Definition of Development:

- We oppose the replacement of "a significant environmental or ecological effect" with "subject to the determination of the department's director." Our Special Management Area (SMA) assessment process is used by professional planners to determine if a project may have a substantial adverse effect, in which case an SMA Use Permit is required. This determination should be made using objective criteria – not personal judgment.

- Likewise, the new wording is too vague. This section should clearly specify the nature of the determination being made (i.e., determination of “development”); it would be best not to delete “defined as ‘development’ for the purpose of this part.”
- Clearly structure, punctuate, and format the final part of the section that starts with “provided that...” so that it’s clear that this language does not only pertain to emergency warning devices.

205A-29(a): Please consult OIP to ensure that this revision is consistent with our current requirements under Sunshine Law.

205A-44(b)(6): We have faced challenges with the lack of definition of “repair.” Clear definitions are needed of critical terms in this section like “repair,” “rebuilt,” and “replaced.”

205A-46(9)(a)(8): Shoreline erosion is not the only reason to prohibit structures that will artificially fix the shoreline. That addition should be removed.

Amendments to such an important statute, though necessary and welcome, should only be made with careful consideration and in close consultation with professionals who rely on it to protect our coastal resources. Please let us know if we can assist in any way as this bill advances.

Thank you for the opportunity to submit testimony on this measure.



OFFICE OF ECONOMIC DEVELOPMENT
THE COUNTY OF KAUA'I

DEREK S. K. KAWAKAMI, MAYOR
MICHAEL A. DAHLIG, MANAGING DIRECTOR

NALANI BRUN
ACTING DIRECTOR

Testimony of Ben Sullivan
Energy & Sustainability Coordinator, Office of Economic Development

Before the
House Committee on Energy & Environmental Protection
House Committee on Water, Land, & Hawaiian Affairs
March 13, 2020, 11:00 am
Conference Room 325

In consideration of
Senate Bill 2060, SD Relating To Coastal Zone Management

Honorable Chair Lowen, Chair Yamane, and Members of the Committees:

The County of Kauai **supports** SB2060, SD2, which amends coastal zone management policy to further protect against impacts of sea level rise, coastal erosion, and other coastal hazards, and requires the Climate Change Mitigation and Adaptation Commission to submit a proposal to the Legislature for a state supplemental insurance program for properties within the state subject to climate change impacts.

The County of Kauai has maintained a strong shoreline setback ordinance for years, and we are acutely aware of these challenging issues. We support the updates proposed in this bill to strengthen coastal zone management policies across the entire state. These updates are critical for the protection of coastal resources and public safety in the face of climate impacts and coastal hazards.

Thank you for the opportunity to testify in support of SB2060, SD2.



SB-2060-SD-2

Submitted on: 3/10/2020 1:34:35 PM

Testimony for EEP on 3/13/2020 11:00:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Dyson Chee	Hawaii Youth Climate Coalition	Support	No

Comments:



SB 2060, SD2, RELATING TO COASTAL ZONE MANAGEMENT

MARCH 13, 2020 · HOUSE ENERGY AND ENVIRONMENTAL PROTECTION COMMITTEE AND HOUSE WATER, LAND, AND HAWAIIAN AFFAIRS COMMITTEE · CHAIRS SEN. NICOLE E. LOWEN AND REP. RYAN I. YAMANE

POSITION: Support.

RATIONALE: IMUAlliance supports SB 2060, SD2, relating to coastal zone management, which amends coastal zone management laws to further protect against impacts of sea level rise and coastal erosion, and requires the Climate Change Mitigation and Adaptation Commission to submit a proposal for a State of Hawai'i supplemental insurance program for properties within the State subject to climate change impacts to the Legislature prior to the Regular Session of 2021.

According to a report produced by the Hawai'i Climate Change Mitigation and Adaptation Commission, global sea levels could rise more than three feet by 2100, with more recent projections showing this occurring as early as 2060. In turn, over the next 30 to 70 years, approximately 6,500 structures and 19,800 people statewide will be exposed to chronic flooding.

Additionally, an estimated \$19 billion in economic loss would result from chronic flooding of land and structures located in exposure areas. Finally, approximately 38 miles of coastal roads and 550 cultural sites would be chronically flooded, on top of the 13 miles of beaches that have already been lost on Kaua'i, O'ahu, and Maui to erosion fronting shoreline armoring, like seawalls.

Furthermore, according to research conducted by Michael B. Gerrard from Columbia Law School, modern-day slavery tends to increase after natural disasters or conflicts where large numbers of people are displaced from their homes. In the decades to come, says Gerrard, **climate change will very likely lead to a significant increase in the number of people who are displaced and, thus vulnerable, to human trafficking.** While the Paris Climate Agreement of 2015 established objectives to limit global temperature increases and several international agreements are aimed at combating modern-day slavery, it is highly uncertain whether they will be adequate to cope with the scale of the problem that is likely to occur as a result of climate change.

As we work to reduce carbon emissions and stave off the worst consequences of climate change, we must begin preparing for the adverse impact of sea level rise on our shores. We are now quantifying the speed at which we must act. We cannot continue to develop the 25,800-acre statewide sea level rise exposure area—one-third of which is designated for urban use—without risking massive structural damage and, potentially, great loss of life.

Therefore, our state should take steps to protect Hawai'i's coastal areas, including by taking steps to mitigate the loss of beaches and public access caused by the expansion of shoreline setback variances granted to armor coastal properties, a process that only exacerbates coastal erosion. For the sake of our keiki, we cannot afford to wait to solidify strategies to preserve our island home for generations to come.

SB-2060-SD-2

Submitted on: 3/10/2020 1:45:03 PM

Testimony for EEP on 3/13/2020 11:00:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Climate Protector	Climate Protectors Coalition	Support	No

Comments:



SIERRA CLUB OF HAWAI'I

SENATE COMMITTEE ON ENERGY AND ENVIRONMENTAL PROTECTION

SENATE COMMITTEE ON WATER, LANDS, & HAWAIIAN AFFAIRS

March 13, 2020 11:00 AM Room 325

In SUPPORT of SB2060 SD2: Relating to Coastal Zone Management

Aloha Chairs Lowen and Yamane, Vice Chairs Wildberger and Todd, and members of the committees,

On behalf of our 20,000 members and supporters, the Sierra Club of Hawai'i **strongly supports SB2060 SD2** Relating to Coastal Zone Management.

This bill updates Chapter 205A-the Hawaii Coastal Zone Management Act, to incorporate sea level rise within its objectives, policies, and permitting processes related to Special Management Areas and Shoreline Setbacks. This is necessary and timely, as sea level rise is here and will continue, at increasing rates, in future years. Its impacts are already being felt, especially in the form of narrowing or loss of beaches--a public trust resource which should be afforded the highest levels of protection.

As noted in Section 1 of the bill, a study by UH researchers titled "Failure to protect beaches under slowly rising sea levels" documents that over the time period covered by the study (1925-2015) more than thirteen miles of beach statewide have been completely lost to erosion fronting seawalls and revetments, due in part to a history of county agencies ("authorities" under Chapter 205A) frequently granting shoreline setback variances where the authorities have made a finding that denial of such variances would present a hardship to the private property applicants.

We strongly support the intent of this bill to halt, and reverse, the narrowing and loss of beaches and public access caused in large part by granting of shoreline setback variances, especially as we enter a new era of sea level rise. As the sea level rises we can expect a dramatic increase in the number of variances sought to armor coastal properties. It is appropriate to take measures now to guard against further coastal armoring and promote managed retreat alternatives where feasible.

Thank you very much for this opportunity to provide testimony on **SB2060 SD2**.

Mahalo,

A handwritten signature in black ink, appearing to read "Dave Raney". The signature is written in a cursive, flowing style.

Dave Raney
Co-Chair
Sierra Club Climate Adaptation and Restoration Team



**Hawaiian
Electric**

**TESTIMONY BEFORE THE SENATE COMMITTEES ON
ENERGY & ENVIRONMENTAL PROTECTION AND
WATER, LAND, & HAWAIIAN AFFAIRS**

**S.B. 2060, SD2
Relating to Coastal Zone Management**

Friday, March 13, 2020
11:00 a.m. Agenda Item # 1
State Capitol, Conference Room 325

Kerstan J. Wong
Director, Transmission & Distribution Engineering Division
Hawaiian Electric Company, Inc.

Dear Chair Lowen and Chair Yamane, Vice Chair Wildberger and Vice Chair
Todd and Members of the Committees,

My name is Kerstan Wong and I am testifying on behalf of Hawaiian Electric
Company, Inc. (Hawaiian Electric) **in opposition of S.B. 2060, SD2, Relating to
Coastal Zone Management.** Hawaiian Electric understands the anticipated effects of
climate change - including increased storm activity and rising sea levels – therefore
these important issues are part of our long-range planning and our ongoing work to
enhance the resilience of our infrastructure.

S.B. 2060, SD2 potentially prohibits the construction of shoreline hardening
structures, including seawalls and revetments. The Bill also increases the shoreline
setback boundary thereby encompassing more facilities that will be required to comply
with this Bill and other existing related statutes such as variance permits. Thus, more
costs and time will be required to maintain existing facilities.

Hawaiian Electric has facilities near the shoreline that are critical to provide
electricity. Occasionally, these facilities require upgrades or repairs to ensure electricity

can be generated and delivered. Thus, this Bill could impede Hawaiian Electric's ability to keep electricity flowing to customers and also increase the cost of electricity.

As an example, our Kahe Generation Facility on Oahu, which is in the shoreline setback area, produces the most firm and reliable electricity on the island. This facility is critically needed at night when the electrical load on Oahu is at its peak and all photovoltaic generation shuts down. Accordingly, Hawaiian Electric opposes S.B. 2060, SD2.

Thank you for this opportunity to testify.

SB-2060-SD-2

Submitted on: 3/10/2020 7:44:24 PM

Testimony for EEP on 3/13/2020 11:00:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Lana Brodziak	Individual	Support	No

Comments:

I suport this bill. Taking sea level rise into account when doing coastal zone management plans/work sounds like prudent action. I feel it is importanat to pass this legislation. Mahalo for your consideration.

SB-2060-SD-2

Submitted on: 3/10/2020 6:18:13 PM

Testimony for EEP on 3/13/2020 11:00:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Benton Kealii Pang, Ph.D.	Individual	Support	No

Comments:

I support SB2060 SD2 and the bills intent to halt and reverse, the narrowing and loss of beaches and public access caused in large part by granting of shoreline setback variances, especially as we enter a new era of sea-level rise. As the sea level rises we can expect a dramatic increase in the number of variances sought to armor coastal properties. It is appropriate to take measures now to guard against further coastal armoring and promote managed retreat alternatives where feasible.

Thank you for the opportunity to comment.

Benton Kealii Pang, Ph.D.

SB-2060-SD-2

Submitted on: 3/10/2020 5:42:04 PM

Testimony for EEP on 3/13/2020 11:00:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Don Aweau	Individual	Support	No

Comments:

SB-2060-SD-2

Submitted on: 3/12/2020 11:24:38 AM

Testimony for EEP on 3/13/2020 11:00:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Elizabeth Benyshek	Individual	Support	No

Comments:

I am in support of SB2060 SD2, which increases protection of our coast from impacts of sea level rise and coastal erosion through amendment of coastal zone management laws. Hawaii is rapidly losing coastal zones due to the impacts of climate change and the public deserves assistance when their properties are eroding away. This bill will ensure that properties within the State subject to climate change impacts have a chance at a State of Hawaii supplemental insurance program through the Climate Change Mitigation and Adaptation Commission. Thank you for your time and consideration.