

MINUTES
FOR THE MEETING OF THE
COMMISSION ON WATER RESOURCE MANAGEMENT

DATE: February 18, 2004
TIME: 9:00 am
PLACE: DLNR Board Room
Kalanimoku Bldg.

A. CALL TO ORDER

Chairperson Peter T. Young called the meeting of the Commission on Water Resource Management to order at 9:12 A.M.

B. ROLL CALL

The following were in attendance:

MEMBERS: Mr. Peter T. Young, Ms. Meredith Ching, Mr. Clayton Dela Cruz, Ms. Stephanie Whalen, Mr. James Frazier and Dr. Chiyome Fukino

STAFF: Ernie Lau, Dean Nakano, Roy Hardy, Ed Sakoda, Glenn Bauer, Lenore Nakama, Dean Uyeno, Kevin Gooding, David Higa, Charlie Ice, Ryan Imata, Dean Nakano, Tiffany Mathias

COUNSEL: Yvonne Izu

OTHERS: Kapua Sproat, Ellen Kraftsow, Jeff Pearson, Manabu Tagomori, Jim Anthony, Russell Tsuji, Linda Chow, Rosemary Liu, Barry Usugawa, Ron Weidenbach, Ron Englund, Dave Penn, Daniel Ornellas, Brian Kau and Glenn Higashi

All written testimonies submitted at the meeting are filed in the Commission office and are available for review by interested parties.

C. ACCEPTANCE OF AGENDA

The items were taken out of order and they are shown in the order taken up by the Commission.

D. APPROVAL OF MINUTES

MOTION: (Frazier/Whalen)
To approve the minutes as circulated.

E. CORRESPONDENCE/ANNOUNCEMENTS

Chairman Young stated that he had received a request to go out of order on some issues so the meeting started with agenda item G1 without objection.

G. NEW BUSINESS

- 1. Hawaii Fish Company, APPLICATION FOR A WATER USE PERMIT, Hawaii Fish Company Well #1 (Well No. 3412-04), TMK 6-9-001:003, WUP No. 669, New (Aquaculture) Use for 0.576 mgd, Mokuleia Ground Water Management Area, Oahu**

PRESENTATION OF SUBMITTAL: Lenore Nakama

Commissioner Frazier asked if there would be an injection well in or around the property as well? Ron Weidenbach, owner of the Hawaii Fish Company, explained that the water would be recycled as much as possible and have multiple uses. Water will be reused after it leaves the aquaculture portion for irrigation, the hatchery, tilapia production and ornamental fish production. Spent water will be discharged to a seepage trench.

Commissioner Frazier asked if the injection of spent water would affect the well site. Mr. Weidenbach stated it should not, but if it does Hawaii Fish Company would be the only party impacted.

RECOMMENDATION:

Staff recommends that the Commission approve the issuance of Water Use Permit No. 669 to Hawaii Fish Company for the reasonable and beneficial use of 0.576 million gallons per day of potable water for aquaculture and domestic use from the Hawaii Fish Company Well #1 (Well No. 3412-04), subject to the standard water use permit conditions listed in Attachment B and the following special conditions:

1. In the event that the tax map key at the location of the water use is changed, the permittee shall notify the Commission in writing of the tax map key change within thirty (30) days after the permittee receives notice of the tax map key change.
2. The applicant shall obtain a water lease/permit from Land Division prior to actual use of the well water.

MOTION: (Frazier/Dela Cruz)
To approve the minutes as presented by staff.
UNANIMOUSLY APPROVED

F. OLD BUSINESS

- 2. Lalakea Alternative Mitigation Project, Six Month Oral Presentation**

Mr. Manabu Tagomori from Kamehameha Schools and Ron Englund from the Bishop Museum gave a PowerPoint presentation. Kamehameha Schools provides a quarterly written report and a six-month oral report.

The Waipi'o Lalakea Alternative Mitigation Project covers two areas: 1) Scientific Research and 2) Educational/Community Participation Component. Basically this is a three-year study that started in July 2003. There will be children from Kamehameha Schools and Kanu o ka 'Aina going down to Waipi'o in March 2004 for a field trip. A request by Ron Englund on behalf of the Community/Teachers to witness flow restoration in Lalakea Stream was made.

1. Modification of Designation Trigger for Waihe'e Aquifer System Area (60103) as a Ground Water Management Area, Wailuku, Maui

Mr. Roy Hardy, Regulation Branch Chief, distributed a PowerPoint presentation handout. Trigger number 4 concerning the water levels at Kanoa Test Hole was discussed. New information has led to the following conclusions: 1) Assumptions of original Kanoa Test Hole trigger no longer valid. 2) Estimated 150-200 ft. clearance from bottom of wells to the mid-point. 3) Chlorides are very low and stable. 4) Pumping condition water levels could take decades to cause undesirable impacts, and 5) Preliminary analysis shows a recharge boundary near North Waihe'e Wells, which could be Waihe'e Stream or something else.

Commissioner Whalen asked when the decision was made in November 2002, what was the estimated clearance between the bottom of the wells and the transition zone? Mr. Hardy showed through the use of graphs in the presentation that the clearance for different wells would vary, but generally it would be approximately 50 ft. greater (200-250 ft.)

RECOMMENDATION:

Given the timescale of ground-water behavior, the best verified information to date, and the desire for current hydrologic projects to come to fruition, staff recommends:

1. That the Commission rescind the Kanoa Test Hole trigger.
2. Defer designation of the Waihe'e Aquifer System (60103) area.
3. Direct staff to pursue a MOA with MDWS that:
 - a. Limits pumpage from existing MDWS wells in Waihe'e to 4.5 mgd; and
 - b. Ensures timely completion of the West Maui ground water numerical model and Waihe'e deep monitor well.
4. Direct staff to provide the Commission with a semi-annual status report on:
 - a. The MOA with MDWS; and
 - b. Waihe'e Aquifer System area hydrologic conditions.

Chairman Young asked for clarification, that the implication is that staff does not believe that the aquifers are at risk at this time? Staff said, strictly based on current hydrologic conditions, the evidence does not reflect any danger at this particular point in time. Chairman Young stated that based on the data we know now, the Kanoa Test Hole water level was at the automatic trigger

level at the time of the decision. The Commission thought at the time that the water level was higher than it actually was. Staff stated that the lower water level probably preceded the decision for a long time and that the current trend is that the aquifer is stable. Chairman Young stated that the Commission has an emergency capability, and by deferring the designation, it can still act within normal procedure, to either call for a special meeting or regular monthly meeting, if there is a problem. Staff said that we would come back to the Commission semi-annually with a report.

Commissioner Whalen asked staff how many inches or feet did the water level have to drop for action to seem necessary, and Mr. Hardy replied a foot. Commissioner Frazier asked if the report could be quarterly instead of semi-annually. It was stated by staff that a semi-annual report would be sufficient however; we could do it quarterly if the Commission desires, and would come before the Commission any time conditions called for it.

Chairman Young confirmed the recommendation to defer designation but leave the process open so that if we pursue designation we don't have to start from zero. There is no actual trigger, it is a monitoring, management process instead.

For the record, Deputy Director Ernest Lau named the organizations that submitted testimonies via email. Those testimonies recommending designation were from Kat Brady, Life of the Land; Isaac Harp, Lahaina, Maui; Clyde Namu'o, The Office of Hawaiian Affairs; and Joe Lander, Na'alehu, Hawai'i.

Testimony was given in person by Kapua Sproat, attorney from Earthjustice. Ms. Sproat referred back to the November 2002 Water Commission Meeting whereby the Commission denied Maui Meadows petition to designate the Iao-Waihe'e Aquifers and where triggers for automatic designation were established. Earthjustice on behalf of Maui Meadows lodged a formal objection to Commissioner Ching's participation in this matter. At the time they were informed by then Chairperson, Gilbert S. Coloma-Agaran, that Commissioner Ching had submitted a letter and had recused herself from the matter. It was Earthjustice's understanding that Ching will be participating today, so for the record, Ms. Sproat renewed the objection to Ching's participation in this matter. Chairman Young stated that in prior Commission meetings this objection was not raised. Ms. Sproat stated that this objection was raised in November 2002 and submitted as part of the written testimony for the record. They were informed at that time that Commissioner Ching would not be participating. It was brought to Earthjustice's attention at the last Commission meeting in January 2004 that Commissioner Ching did participate in voting and that is why they are renewing their objection. Ms. Sproat formally lodged her objection to Commissioner Ching's participation in this matter.

It was Ms. Sproat's understanding that Commissioner Ching is Vice President of Government and Community Relations for Alexander and Baldwin. Ching's employer both owns wells and uses water from the Iao-Waihe'e Aquifer Systems. It was also Ms. Sproat's understanding that A & B is one of the private partners in the Central Maui Joint Venture and that they continue to maintain contractual relations with the County of Maui DWS regarding water sources in both Iao and Waihe'e. Because the Commission has the authority today to affect the interest of

Commissioner Ching's employer, Ms. Sproat objected to her participation because it creates both a conflict of interest and the appearance of impropriety.

For the record, Commissioner Ching stated that she did recuse herself from the November 2002 and asked advice from legal counsel because her employer A & B does have wells in the Iao Aquifer not in the Waihe'e Aquifer. Although Commissioner Ching was advised that it would not cause a conflict, she decided to recuse herself from the Iao action. The action happened to include both the Iao and Waihe'e Aquifers. Because we are now just considering the Waihe'e Aquifer, and the company does not have any wells in Waihe'e Aquifer, she did not feel there was a need to recuse herself from the action that is currently before us.

Attorney General Yvonne Izu spoke to Commissioner Ching beforehand and considered all the concerns that were raised and stated there was no conflict and advised her that she could participate.

Ms. Sproat stated that although A & B doesn't own wells in the Waihe'e Aquifer it was her understanding that they continue to use water from that aquifer and that they were partners in the Central Maui Joint Venture and continue to maintain relations with the County of Maui DWS. For the record she lodged her objection. Chairman Young stated for the record that the Attorney General indicated that Commissioner Ching could participate.

Ms. Sproat urged the Commission to comply with the automatic trigger for designation that was established in November 2002 and to immediately designate the Waihe'e Aquifer as a ground water management area.

Ms. Sproat's written testimony on Agenda Item F1 is also available.

A written statement by William Meyers, former USGS District Chief, is also attached for reference.

Ms. Sproat summarized her testimony saying the Waihe'e Aquifer continues to be threatened by both existing and proposed withdrawals of water, therefore, she opposed any action to remove automatic designation. As detailed in Earthjustice's testimony in October 2003, January 2004 and today, the course of action that was needed by the resource and required by the law is automatic designation.

Chairman Young wanted clarification with the Attorney General about making changes and decisions, is it quasi-judicial proceedings? Chairman Young asked if this proceeding is quasi-judicial or quasi-legislative? Attorney General Yvonne Izu stated that it was quasi-legislative, referring back to the Koolau Ag decision and the Supreme Court.

Chairman Young stated that based on what we know now as opposed to what was known in November 2002 the Commission would not have made that type of trigger designation because it would have been an ineffective trigger because it was already self-fulfilled. They continued on because the expectation was it was not a self-fulfilled trigger. He asked, "shouldn't we deal with

what we know today rather than deal with what has proved to be false information and what would have been an ineffective trigger from November 2002?"

Ms. Sproat stated that even if the aquifers were designated today, it would only start the process. After that, the Maui residents would have up until a year to file water use permits. Once those applications are filed, the Commission will have to process them, and that can take anywhere from 6 months to years to complete. The reason Earthjustice was urging for designation now is that it will only start the process, it will take several years before the Commission actually has the tools to manage the aquifer. Even though it's the Commission's responsibility under the Water Code and the Constitution to protect the resource and actively manage water resources, the Commission doesn't have the tools to manage water use absent designation. There is really no downside to designation, it provides more information to the Commission and it starts the process earlier, and in addition it is required by law.

Dr. Jim Anthony, who works for an environmental group that monitors water issues statewide, mentioned that his group put \$100,000 into the Waiahole Case, which they take seriously as now the law, particularly with respect to the precautionary principle and the public trust doctrine. For the record, Dr. Anthony stated that Commissioner Ching does have a conflict of interest. It also has had new life breathed into it in the recent decision written by Judge Levinson in the Supreme Court Case involving Wai'ola O Moloka'i. In that case he re-invokes the Commission's obligation to honor the precautionary principle that says if you're in doubt, either don't do it or do it in order to protect the resource. The Commission has an obligation to protect this resource and the Commission can better protect it if we designate now. There is no loss to the Board of Water Supply and whatever water it may apply for to service the people, and the conditions under which it will be able to take water will be more carefully managed and nurtured.

Dr. Anthony also referred to William Meyer's written statement saying that it rebuts the technical bases that staff member Mr. Roy Hardy presented earlier. Dr. Anthony stated that the technical bases of the arguments that have been made by staff are found to be defective and for that reason the Commission should consider designation at this time and not defer it until later. The prudent, sensible, and legally correct thing to do in keeping with the Commission's responsibilities particularly the public trust doctrine and the precautionary principle is to vote for designation now.

A question was raised whether the agreement with the Maui Board of Water Supply is appropriately set at 4.5 mgd rather than 4 mgd. Chairman Young asked if there was any comment on that and staff answered by saying there is merit by keeping it at 4 mgd however, there is an alternative source that isn't being used right now, the Kupa'a Well. Staff feels that it is premature at this time to relate infrastructure sustainable yields to aquifer wide sustainable yields. Staff would feel more comfortable at 4 mgd but there has also been another user in the area that has been pumping. So far the track record shows the total pumping is above 4.5 mgd and things seems to be stable over the course of several years. Chairman Young stated an issue raised on the precautionary principle, he asked if staff recommendation is taking an aggressive or precautionary approach? Staff believed this is still precautionary.

Commissioner Frazier asked if the Kupa'a Well comes on does something else goes off? Staff said that it will definitely have an impact and change. That will not happen soon, so there is time to weigh that.

Deputy Director Jeff Pearson from the Maui DWS stated that Deputy Lau has discussed the MOA with Mr. George Tengan and himself. The department feels that they can meet the 4.5 mgd based on the 12-month moving average. At times, during the dry periods, and not knowing the estimated growth of Maui County and the Central Maui area, it might be difficult to meet the demand if both aquifers, Iao and Waihe'e were held at 18 and 4.5 mgd respectively, at the same time. MDWS is working on obtaining additional surface water use and sources. DWS serves the community and provides clean water to the community. DWS is not out to damage the aquifer to raise chlorides or to overpump Iao or Waihe'e. The MDWS intent is to provide good water and maintain the sustainability aquifers. MDWS will try to meet that 4.5 mgd based on a 12-month moving average.

Commissioner Frazier mentioned the need for growth and asked if there were resources like in Waikapu and other places that could be tied in with growth as opposed to taxing these particular aquifers. Deputy Pearson stated that the Waikapu Aquifer has a 1 mgd sustainable yield and they are working on another well in Waikapu. They are also working on surface water issues and upgrading and increasing the flows at the Iao Treatment Plant. If everything goes as planned the expansion should be completed before the end of 2004.

AMENDED RECOMMENDATION:

1. Rescind all triggers;
2. Limit MDWS Waihe'e pumpage to 4.0 mgd based on a 12 month moving average.

MOTION: (Frazier/Whalen)

To approve as amended.

UNANIMOUSLY APPROVED

F. OLD BUSINESS

- 3. James Shephard, APPLICATION FOR WATER USE PERMIT No. 678, Kalua'aha-Shephard Well (Well No. 0449-06), TMK 5-7-11:20, Future (Domestic and Agricultural) Use for .008 mgd, Ualapu'e Ground Water Management Area, Molokai**

PRESENTATION OF SUBMITTAL: Charley Ice

RECOMMENDATION:

That the Commission:

1. Approve the issuance of Water Use Permit No. 678 to James Shephard for the reasonable and beneficial use of 8,000 gallons per day of potable water for domestic and agricultural from

the Kalua'aha-Shephard Well (Well No. 0449-06), subject to adequate pump test results, and subject to the standard water use permit conditions listed in Exhibit 5 plus the following special conditions:

- a. If an alternate permanent source of water is found for this use, then the Commission reserves the right to revoke this permit, after a hearing.
 - b. In the event that the tax map key at the location of the water use is changed, the permittee shall notify the Commission in writing of the tax map key change within thirty (30) days after the permittee receives notice of the tax map key change.
 - c. In the event the pump tests show that aquifer boundary conditions do not support the requested withdrawals, the Commission reserves the right to amend this permit, after a hearing, to a level that is supported by the pump tests.
2. Require that an archaeological survey acceptable to the Historic Preservation Division be conducted, to identify and protect significant historic sites and artifacts, prior to acceptance of the well construction permit application.
 3. Recommend that the landowner consult local experts, such as the Natural Area Reserves Program on Oahu, Nature Conservancy on Molokai, or the USDA/NRCS Plant Material Center on Molokai, to protect against potential escape of plantings of invasive species.

MOTION: (Fukino/Whalen)
To approve the submittal.
UNANIMOUSLY APPROVED

G. NEW BUSINESS

3. Pristine Stream Policy Recommendations and Proposed Actions

PRESENTATION OF SUBMITTAL: Ed Sakoda/Dean Uyeno

Ed Sakoda gave a PowerPoint presentation (see handout).

Dr. Jim Anthony stated that the Pristine Stream Policy Recommendations and Proposed Actions submittal for the February 18, 2004 Commission meeting fell short of the effort and misdirects the effort that needs to be undertaken by the Commission with regard to establishing in-stream flow standards and identifying those streams or portions of streams to be reserved and protected as part of the public trust.

Dave Penn, Total Maximum Daily Load Coordinator, State of Hawaii Department of Health, Environmental Health Planning Office, stated that there is a lot of merit and potential benefit from both the Wild & Scenic Rivers Program and a Pristine Stream Policy. However, he also stated that there is a lot of overlap and interaction of these with Clean Water Act requirements,

Department of Health programs, and other government and community programs and initiatives. For example, we have the National Resource Inventory maintained by the Federal Government that already lists over 40 streams or stream segments.

An appropriate approach would be to identify all of the streams that flow within the natural area reserves and make those the Pristine Streams. He stated that the biggest gap in preserving and protecting streams of any quality is the lack of monitoring and reporting and evaluation of existing streamflows. Also, the lack of hydrologic and ecologic guidelines for new stream channel alterations.

Mr. Penn stated that 2 streams on the list, Hakalau and Honoli'i, are currently listed on the State's Clean Water Act as having impaired water quality due to excessive levels of nutrients and sediments.

Commissioner Ching asked what was it that placed them on that list? Mr. Penn stated that it was visual assessments that were conducted in 1996 by a team of EPA investigators. There was muddy water with algae blooms in it.

Kapua Sproat, attorney with Earthjustice asked that the Commission seek more public input on this matter before taking the draft out to the community for public hearings. Commissioner Frazier made a good point in soliciting input not just from the SPAM Task Force but from other task forces that were convened by the Commission including those of Native Hawaiian Rights and Appurtenant Rights because members of those task forces may have relevant expertise and information. Ms. Sproat also encouraged the Commission to involve the community and invite interested members of the public to attend. She also stated that the Commission should notice community meetings, invite people to attend, solicit input at the beginning before taking the draft to the community and not conduct meetings behind closed doors.

Ms. Sproat stated that water issues in Hawaii, fortunately or unfortunately, are very controversial and inherently political. To solicit input from people first would give people a stake in what comes out as well as help provide the Commission and community with a better product. The Commission can establish a process that will succeed by not taking the draft out for public comment at this time but soliciting more input from relevant task forces that have been convened by the Commission and public.

Based on the testimony Deputy Lau asked to defer action and for staff to set a timeline for development of a Pristine Stream Policy. Working with the community and other stakeholders by holding public meetings would get the ball rolling in terms of discussion and would get peoples attention.

MOTION TO DEFER: (Frazier/Dela Cruz)
UNANIMOUSLY APPROVED

H. REPORTS

1. Status of the Agricultural Water Use and Development Plan and the Maui County Water Use and Development Plan

PRESENTATION OF REPORT: Dean Nakano

Planning Branch Chief Dean Nakano presented an overview of the Agricultural Water Use and Development Plan and the Maui County Water Use Development Plan. He gave background on the Hawaii Water Plan, HWP Framework, Status of AWUDP, Status of the Maui County WUDP and Next Steps. Please refer to the PowerPoint handout that was distributed.

Recess: 12:34P.M. No quorum

Resumed: 12:43P.M.

2. Presentation by Maui Department of Water Supply on the update of the Maui County Water Use and Development Plan

PRESENTATION OF REPORT: Ellen Kraftsow

Ms. Kraftsow is employed by the Maui County Department of Water Supply. Also accompanying Ms. Kraftsow was Jeff Pearson, Deputy Director of the Maui County Department of Water Supply and consultant, Carl Friedman. Ms. Kraftsow covered in her presentation Water Use Development Plan requirements and guidelines, a brief history, proposed process, supporting work to date and policy questions.

Please refer to the handout that was distributed for this presentation.

G. NEW BUSINESS

4. Approval of Project Description for Updating the Maui County Water Use & Development Plan

PRESENTATION OF REPORT: Dean Nakano

Commissioner Ching commended the work that has been done by Maui County and asked if the Upcountry and Central Maui Systems would be planned separately. Ms. Kraftsow stated that they would. They would present system descriptions and regulatory framework to each area.

Commissioner Frazier also commended Maui for moving forward and for the good work. He stated that there was not a lot activity from Soil Water Conservation Districts or NRCS. Commissioner Frazier asked if they were a resource and it was acknowledged that they are.

RECOMMENDATION:

Staff recommends that the Commission:

1. Approve the Maui County, Department of Water Supply's, Project Description for Updating the Maui Water Use and Development Plan; and
2. Authorize staff to participate in meetings and/or workshops, as necessary, with pertinent State and County agencies to facilitate implementation of statutory and framework provisions for updating the Maui County Water Use and Development Plan.

MOTION: (Frazier/Ching)
To approve staff recommendation.
UNANIMOUSLY APPROVED

Chairman Young excused himself at 1:18P.M. and designated Commissioner Dela Cruz to continue the meeting.

H. REPORTS

3. Presentation by the Department of Agriculture on the Status of the Agriculture Water Use and Development Plan

PRESENTATION OF REPORT: Mr. Brian Kau, Administrator, Agricultural Resource Management Division, Department of Agriculture

A report that was submitted to the Legislature in January 2004 was distributed. Mr. Kau stated that the Agricultural Water Use Development Plan was mandated under Act 101, Session Laws of Hawaii (SLH) in 1998. It mandated that the Department of Agriculture (DOA) shall be responsible for the preparation and regular updating of a State Agricultural Water Use and Development Plan (AWUDP).

The DOA has completed the AWUDP required elements for ten systems and this report was submitted to the legislature in January 2004.

Please refer to the handout that was distributed for this presentation.

Mr. Kau stated that the DOA is currently in the process of seeing if a watershed project is feasible in the Ka'u area. DOA has been working on it for about a year now and is preparing a feasibility study that will identify what the cost benefit ratios are, whether or not it is a candidate for a watershed project.

Deputy Lau stated that there was a meeting with Ka'u Ag and Wood Valley and both groups have agreed to work together for long range planning and infrastructure.

G. NEW BUSINESS

2. Revisions to the Hawaii Well Construction and Pump Installation Standards

PRESENTATION OF SUBMITTAL: Kevin Gooding

The Water Code (§174C-86 HRS) mandates that the Commission shall adopt minimum standards for the construction of wells and the installation of pumps and pumping equipment. Staff's goal in this revision has been to streamline the Standards.

RECOMMENDATION:

The Commission adopts the proposed February 2004 edition of the Hawaii Well Construction and Pump Installation Standards in Attachment A.

Commissioner Frazier suggested that a re-visit every 5 years be part of the recommendation.

Commissioner Whalen asked when was the last time it was revisited and staff said it was 1999.

Commissioner Ching moved that staff amend the recommendation and that standards be reviewed on a 5-year basis. Commissioner Frazier seconded.

MOTION: (Ching/Frazier)

To approve the staff recommendation as amended.

UNANIMOUSLY APPROVED

I. TOPICS FOR FUTURE COMMISSION MEETINGS

Deputy Director Lau asked that the Commissioners take a look at the Hawaii State Supreme Court decision on Wai'ola O Moloka'i case. He will request that the AG's office to do a briefing for the Commission on the Contested Case Hearing on Water Use, Well Construction, and Pump Installation Permit Applications, filed by Wai'ola O Moloka'i, Inc. and Moloka'i Ranch, Limited at the March 17, 2004 meeting.

J. NEXT COMMISSION MEETINGS (TENTATIVE)

1. March 17, 2004
2. April 21, 2004

K. UPCOMING EVENTS

L. EXECUTIVE SESSION

M. ADJOURNMENT

The meeting was adjourned at 1:52P.M.

MOTION: (Dela Cruz/Whalen)
UNANIMOUSLY APPROVED

Respectfully submitted,

PAULYNE ANAKALEA
Secretary

APPROVED AS SUBMITTED:

ERNEST Y.W.LAU
Deputy Director