



May 16, 2021

Via Electronic Mail

Commission on Water Resource Management
Kalanimoku Building
1151 Punchbowl Street, Room 227
Honolulu, Hawai'i 96813
dlnr.cwrn@hawaii.gov

Re: Agenda Item B.3
Approval of the County of Maui Department of Water Supply's Project Description to Update the Water Use and Development Plan for the Island of Moloka'i
Tuesday, May 18, 2021, 9 a.m.
Via Remote Video Conferencing

Dear Chair Case and Commissioners:

Mahalo for the opportunity to comment on the scope of work for Maui County Department of Water Supply's ("DWS's") update to the Moloka'i Water Use Development Plan ("WUDP"). We appreciate the outreach that DWS and consultant Townscape, Inc. have initiated with community members, stakeholders, and advocates in developing a plan for the update.

After discussions with our clients on Moloka'i and other community members, we respectfully request that the scope of work for the WUDP update include specific language reflecting a commitment to incorporate mitigative actions to increase aquifer recharge and protect the nearshore coastal environment from excessive runoff and sedimentation. In updating the WUDP, we strongly urge a holistic planning process that addresses the hydrological cycle both on the front end (aquifer recharge/erosion control), in addition to back-end considerations (constraining pumping and diversion to what the hydrological system can support/water conservation measures for end users). Ground water resources are inextricably linked with nearshore marine resources, and this is perhaps nowhere more apparent than on Moloka'i.

Moloka'i reefs are a vital food source for residents and include the densest and largest continuous reef in the main Hawaiian Islands along the southern shore. Moloka'i's southern fringing reef is regarded as a state and national treasure, but also faces numerous threats, most of which are induced by humans. One major threat to the reefs is sedimentation caused by massive surface runoff during heavy rain events. These events are easily visible along the

southern, western, and northwestern coasts of Moloka‘i as massive plumes of reddish-brown runoff surrounding the island. This storm sediment has periodically smothered the reef for decades. While massive amounts of water and sediment flow over the top of the reefs after heavy rains, less water has reached the shore via subterranean seepage since Moloka‘i’s aquifer system was developed with wells: groundwater withdrawals directly reduce natural discharge to the ocean and streams,¹ and such discharge is vital to maintaining the abundance and vibrancy Moloka‘i’s reefs are famous for.

Reforestation with native plants can help to control runoff by slowing the water’s descent over land and enhancing the soil’s water retention capacity. Retained water, in turn, seeps down into the aquifer, recharges it, and flows down to the ocean either underground or in streams—instead of sloughing off the surface and taking the soil with it, smothering the reef in the process. Water pumped from a well or diverted from a stream is water that cannot then flow to the shoreline via natural hydrological processes, but conversely, additional water retained for aquifer recharge means more water that *can* percolate to the coastline, potentially offsetting some of the impacts to nearshore flow caused by well pumpage. Establishing mauka-to-makai watershed management that promotes aquifer recharge—while protecting the shoreline from runoff—is a common-sense solution that should be part of any water use plan for Moloka‘i, which is the only island designated as a ground water management area in its entirety, and where the community depends directly on the health of the reefs and nearshore environments for subsistence and sustenance.

For the foregoing reasons, we respectfully request that the following language, or similar, be included in the scope of work for the Moloka‘i WUDP Update²:

“The WUDP Update shall develop and propose specific mitigative actions that will help to ensure and enhance Moloka‘i’s near-shore environment, which is vital to the Moloka‘i community and inevitably impacted by groundwater withdrawals and surface water diversions. These actions shall include but not be limited to:

- **implementing community-led efforts to replace invasive species with native species to improve the health of coastal ecosystems;**
- **supporting and encouraging efforts to reduce erosion and runoff, including reforestation of watersheds and potential watersheds with native trees and plants to promote rainfall and water retention in the soil; and**

¹ Delwyn S. Oki, *et al.*, USGS, *Numerical Simulation of Groundwater Availability in Central Moloka‘i, Hawai‘i* (2020), at 3.

² Pursuant to HRS § 174C-31(f), county WUDPs “shall include but not be limited to . . . status of . . . drainage, reuse, reclamation, recharge, and resulting problems and constraints,” as well as “future land uses and related water needs” and requires consideration of alternatives.

- **promoting awareness of the connection between our fresh water uses and the health of reefs and other nearshore systems through educational programs, including the use of outdoor classrooms.”**

Respectfully submitted,

/s/ Mahesh Cleveland

Mahesh Cleveland

Leinā'ala L. Ley

EARTHJUSTICE

May 18, 2021

TO: Commission on Water Resource Management

FROM: Barbara Kalipi
Hoolehua Homesteader

RE: Approval of the County of Maui Department of Water Supply's Project Description to Update the Water Use and Development Plan for the Island of Molokai

Aloha Commissioners! I have the following comments to make on the above agenda item:

- The project framework to updating the plan is solid with its first 2 core principles emphasizing a holistic approach, community involvement throughout the process
- I'm not clear how "respect for" the indigenous culture, rights, traditions, and practices will be actualized in the process; I'd like to have it better defined, more along the lines of "alignment with"
- In recent community discussions, it was brought to our attention that the Department of Hawaiian Home Lands in its application for a ground water use permit recommended that the permit conditions include certain actions that assure the department's proactive management and stewardship responsibilities for its water resources:
 - Work to implement community-led efforts to replace invasive species with native species to try to improve the health of the coastal ecosystem;
 - Support and encourage efforts to reduce erosion and restore native vegetation in Kalama'ula's mauka areas; and
 - Make available certain Community Use designated areas as outdoor classrooms for schoolchildren, particularly for the perpetuation of traditional and customary groundwater dependent practices and resource management

The updating of the Water Use and Development Plan for Molokai should articulate the responsibility of water users to not just ask for our precious and limited resource but to be stewards of that resource as well as we all should be.

Mahalo for considering my mana'o.

Aloha, Chair Case and Commissioners:

Our names are Momi and Lana we are residents of Moloka'i. We are submitting this testimony to comment on agenda item B.3, the scope of work that is proposed for the Moloka'i Water Use Development Plan update. We agree that the WUDP for Moloka'i needs to be updated, and feel strongly that more must be done to promote aquifer recharge and protection of the nearshore ecosystems our community depends on. Therefore, we request that the scope of work for the update be amended to include the following provision:

The WUDP Update shall develop and propose specific mitigative actions that will help to ensure and enhance Moloka'i's near-shore environment, which is inevitably impacted by groundwater withdrawals and surface water diversions. These actions shall include but not be limited to: implementing community-led efforts to remove invasive species and replace them with native species to improve the health of coastal ecosystems; supporting and encouraging efforts to reduce erosion and runoff, including reforestation of failing watersheds with native trees and plants to promote rainfall and water retention in the soil; and fostering greater community awareness of the connection between our ground water uses and the health of reefs and other nearshore systems through educational programs, including the use of outdoor classrooms, to perpetuate traditional and customary groundwater-dependent practices and resource management.”

Mahalo for the opportunity to testify.

Amber Kukuileiwilimomi Afelin and Lana Corpuz.

Mahalo,
A. Momi Afelin
[Thomas J. Watson Fellow](#)

Glenn I. Teves

Email: [REDACTED]

May 18, 2021

TO: Commission on Water Resource Management

FROM: Glenn I. Teves
Hoolehua Homesteader

RE: Update of the Molokai Water Use and Development Plan Update

Aloha! I would like to comment on the Molokai Water Use and Development Plan Update to assure the following are addressed:

1. Collect data to support and propose a Surface Water Designation for the Molokai Forest Reserve:

Our watershed is being impacted by climate change and overdrawn at times of limited rainfall, especially during the drier months thereby not allowing the water to seep back into the land to recharge our aquifers. We have been pushing this idea for over 25 years, and it's fallen on deaf ears. You cannot just manage ground water without having an intimate knowledge of surface water use. With a decreasing Sustainable Yield of Kualapuu Aquifer, we need to be quantifying water withdrawals from our watershed as well.

2. Taking care of the land:

I know in the future there will not be sufficient for the almost 18,000 acres of Hawaiian Homes Land surrounding the Kualapu'u Aquifer, so we'll need to look at how we take care of the land. I support the following conditions proposed by DHHL and it should be imposed on any entity requesting water from aquifers and surface water sources that it seriously protects the source and surrounding areas and not just the destination of the water.

"DHHL believes that if this WUPA is issued for the requested amount, permit conditions should include that DHHL shall:

- Work to implement community-led efforts to replace invasive species with native species to try to improve the health of the coastal ecosystem;
- Supported and encourage efforts to reduce erosion and restore native vegetation in Kalama'ula's mauka areas; and
- Make available certain Community Use designated areas as outdoor classrooms for schoolchildren, particularly for the perpetuation of traditional and customary groundwater dependent practices and resource management."

3. Impress upon the County Water Board their responsibility in upholding provisions of the Hawaiian Homes Act as it relates to prior rights to water.

The Maui Water Board and other county water boards do not understand their responsibilities in upholding provisions of the Hawaiian Homes Act as it relates to the hierarchy of water rights. Many Hawaiian Home Lands areas in Maui are not being properly served, such as Keokea. The County Water Boards are not an entity unto themselves; they are also responsible in upholding the State Water Code, the umbrella law that all counties fall under. This concept needs to undergird all County Water Plans throughout Maui Nui as well as all counties in Hawaii.

Mahalo for this opportunity to provide testimony.

Saturday, May 15, 2021

Aloha Commissioners,

This testimony is submitted regarding the County of Maui's Water Use Development Plan Proposal, Agenda Item B.3. on your Tuesday May 18 agenda.

The island of Moloka'i has a limited supply of ground water, and salinity counts in some of our wells are rising. Recent USGS studies show that increasing well pumpage will have adverse impacts on shoreline freshwater discharge, which will degrade Moloka'i's fringing reef. (The USGS calls the reef a "national treasure.") Because we are already seeing the negative consequences of inadequate water use management, it is critical for the County's plan to encompass the entire island ecosystem, from mauka to makai.

Effective management of water resources on Moloka'i will require new measures to put water back into the ground. The County's plan should include reforestation, erosion control, replanting native species, water conservation, and community education about the impacts of diminishing ground water discharge on our reefs. If these steps are not taken now, it may be impossible to ameliorate the future consequences of a depleted groundwater system.

Thank you for considering my testimony.

Karen M. Holt, Esq.
Executive Director
Moloka'i Community Service Council
[REDACTED]
Kaunakakai, Hawai'i 96748

Aloha, Chair Case and Commissioners:

My name is Lori Buchanan and I am born, raised and reside in Kalae, Molokai. I am submitting this testimony to comment on your May 18, 2021 agenda item B.3, the scope of work that is proposed for the Molokai Water Use Development Plan update.

I agree that the WUDP for Molokai needs to be updated, and feel strongly that more must be done to promote aquifer recharge and protection of the nearshore ecosystems our community depends on. Therefore, I request that the scope of work for the update be amended to include the following provision:

“The WUDP Update shall develop and propose specific mitigated actions that will help to ensure and enhance Molokai’s near-shore environment, which is impacted by groundwater withdrawals and surface water diversions. These actions shall include but not be limited to: implementing community-led efforts to replace invasive species with native species to improve the health of coastal ecosystems; supporting and encouraging efforts to reduce erosion and runoff, including reforestation of failing watersheds with native trees and plants to promote rainfall and water retention in the soil; and fostering greater community awareness of the connection between our ground water uses and the health of reefs and other nearshore systems through educational programs, including the use of outdoor classrooms, to perpetuate traditional and customary groundwater-dependent practices and resource management.”

My family owns and has perpetual care of an ancient Hawaiian fishpond and we know that what happens on the mountain top effects the conditions in our fishpond and our ocean. I am a limu practitioner and am witness to the decline and demise of limu species important to my culture in my lifetime. Please help us to stop the loss of our native ecosystems and support restoration through the Water Use Development Plan for Molokai.

Me ka ha‘a ha‘a.

Lori Buchanan
Molokai resident and community advocate
[REDACTED]
Hoolehua, Hawaii 96729

Sunday, May 16, 2021

Aloha, Chair Case and Commissioners:

I hope this testimony is not too late to be included. I just learned of this this morning. My name is Matt Yamashita and I am a resident of Kamiloloa, Moloka'i. I was born and raised on Molokai and am an avid fisherman, surfer, and hunter. I am also an Emmy Award winning filmmaker who has been producing documentaries about conservation and environmental issues for the past 20 years.

I am submitting this testimony to comment on agenda item B.3, the scope of work that is proposed for the Moloka'i Water Use Development Plan update. I agree that the WUDP for Moloka'i needs to be updated, and feel strongly that more must be done to promote aquifer recharge and protection of the nearshore ecosystems our community depends on. Therefore, I request that the scope of work for the update be amended to include the following provision:

“The WUDP Update shall develop and propose specific mitigative actions that will help to ensure and enhance Moloka'i's near-shore environment, which is inevitably impacted by groundwater withdrawals and surface water diversions. These actions shall include but not be limited to: implementing community-led efforts to replace invasive species with native species to improve the health of coastal ecosystems; supporting and encouraging efforts to reduce erosion and runoff, including reforestation of failing watersheds with native trees and plants to promote rainfall and water retention in the soil; and fostering greater community awareness of the connection between our ground water uses and the health of reefs and other nearshore systems through educational programs, including the use of outdoor classrooms, to perpetuate traditional and customary groundwater-dependent practices and resource management.”

This is important to me because in my lifetime, and especially in recent years, I have witnessed the degradation of both terrestrial and marine environments on Molokai. Drought conditions spurred by worsening climate change patterns, an explosion of invasive plants and grazing animals, and lack of responsible land management by large landowners are all contributing to the problem. To avoid environmental collapse, we need to focus on the basics. Wise use of water resources is important, but more so is the restoration and enhancement of our watersheds to ensure a replenishment of our water resources for supporting a healthy environment and the lives of our future generations.

Mahalo for the opportunity to testify.

Matt Yamashita

Owner, [Quazifilms Media](#)

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