

February 15, 2022

To: Commission On Water Resource Management
From: Hawai'i Peace and Justice

RE: In support of the Immediate Defueling and Permanent Decommissioning of the Entire
Red Hill Bulk Fuel Storage Facility

Aloha Commission,

My name is Rebekah Garrison and I am a water drinker, a member of O'ahu Water Protectors, and a community organizer for Hawai'i Peace and Justice (HPJ). HPJ is a grassroots organization that strives to create a more peaceful, just and sustainable Hawai'i.

Thank you to the Commission On Water Resource Management for prioritizing the protection of the island's most precious resource—clean, unpolluted drinking water. HPJ strongly supports the immediate defueling and permanent decommissioning of the entire Red Hill Bulk Fuel Storage Facility.

The navy's negligent behavior concerning Kapūkaki, also widely known as Red Hill, is nothing less than an assault of the public trust. Poisoning the aquifer since the facility's inception, the fuel farm at Red Hill has been grossly mismanaged from the beginning of construction. None of us know with absolute certainty how much fuel has actually been released from this corroding facility nor where the fuel plume is migrating to. After 72 leaks dating back to 1947, the navy has put its own service members and all of O'ahu in crisis. As a result, the public, those fellow water drinkers you all swore to protect, no longer trust the navy to safely operate their wells.

Considering that the navy has put all our lives and livelihoods at risk, HPJ requests the Commission to do everything in its power to urgently act to protect public trust resources. Please protect the fresh drinking water of hundreds of thousands of O'ahu residents before it is polluted beyond repair.

It does not take a rocket scientist to know that storing fuel over an aquifer is not a good idea. As proven time and time again, the navy cannot adequately maintain the 20 corroding fuel tanks holding 200 million gallons of fuel a mere 100 feet above O'ahu's sole-source aquifer. None of us asked for this burden, much less Kapūkaki. Drain the tanks, shut down the facility, and prioritize the lives of all who call O'ahu home.

Sincerely,
Rebekah Garrison
Hawai'i Peace and Justice

From: [ann Wright](#)
To: [Hyatt, RaeAnn P;](#) [DLNR.CW.DLNR.CWRM](#)
Subject: [EXTERNAL] Testimony for Commission on Water Resource Management meeting on February 15, 2022
Date: Monday, February 14, 2022 11:37:13 AM

Testimony for February 15, 2022 Commission on Water Resource Management meeting

I am providing testimony on the Red Hill update portion of the Commission on Water Resource Management hearing which will have presentations from:

- a. State Department of Health – Update on Drinking Water System Flushing and Water Quality Data Collection
- b. Naval Facilities Engineering Systems Command Hawai'i (NAVFAC Hawai'i) – Update on Drinking Water Systems Recovery and Red Hill Shaft Recovery and Monitoring Plan
- c. United States Geological Survey – Red Hill Synoptic Groundwater-Level Surveys and Seepage Runs, December 2021 to January 2022
- d. University of Hawaii – Red Hill Response and Research

I am a 20-year resident of Honolulu. I served 29 years in the U.S. Army/Army Reserves. I was a U.S. diplomat for 16 years and served at U.S. Embassies in countries where drinking the local water was not recommended. I drank filtered water in Panama, Nicaragua, Somalia, Sierra Leone, Mongolia and Afghanistan.

I never thought I would need to consider the drinking water in a place like Honolulu to be so contaminated that I would need to drink bottled water. But now it is a distinct possibility with 93,000 in our community having had to do so for over six weeks due to the jet fuel contamination from the leaking Navy Red Hill jet fuel storage tanks. Unless the fuel tanks are drained and are permanently closed down, the possibility for the entire water supply of Honolulu to be contaminated is predicted.

It is very apparent that the Navy has not maintained the 80-year-old leaking tank system properly.

As disclosed in the past week alone by reporting in Civil Beat from information

finally revealed in documents from the Navy that were only provided due to a Freedom of Information Act demand, the closed-circuit camera system to provide immediate visual record on problems in the tunnel and tank system has been inoperative for over one year.

And even more importantly, the fire suppression system that would put out fires in the jet fuel storage area has been a source of concern for years.

According to [the Civil Beat article](#), “In December 2019, one part of the fire suppression system that was installed in the 1980s suffered a pump failure, according to a publicly available Navy memo. Another part of the system, installed in 2017 and expanded in 2019, had a leak that required repair last year, but the Navy didn’t know where the leak was, the memo said.”

As of March, both parts of the system had experienced “unexpected operational failure” and would deploy only water – not firefighting foam – on a fuel fire, according to the Naval Facilities Engineering Systems Command memo, which was written to justify the hiring of a contractor to fix the problems.

Such a scenario would cause “catastrophic” damage to the World War II-era facility, the Navy said.

“Operating this fuel facility without a reliable fire protection system is not an acceptable course of action,” the memo said.

We should remember that in June 2020, while anchored in the San Diego harbor, a fire completely [destroyed the US Navy's, USS BonHomme Richard](#), because the crew did not know how to use or [use properly the onboard fire](#) suppression equipment.

The destruction of a \$1.2 billion ship due to the Navy’s lack of crew training and supervision of a national security installation demonstrates for us in Honolulu that again, DOD and the Navy have an institutional lack of maintenance and security on these national security installations which jeopardize the health and safety of us who reside on an island that has four major U.S. military installations.

The 80-year-old Red Hill jet fuel storage facility must be immediately and permanently closed down for the safety and security of the people who reside on O'ahu, including the families of the military themselves.

I would like to give oral testimony to the Commission also.

Thank you,

Ann Wright

[REDACTED]

Honolulu, HI 96826

[REDACTED]

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Ann Wright
Dissent: Voices of Conscience
www.voicesofconscience.com

02/15/22

Aloha Commissioners,

My name is Shelley Muneoka and I'd like to submit testimony as a resident of Makiki and as a Kanaka Maoli who is concerned about the contamination of our ancestral wealth of fresh clean water and about the future of life on O'ahu.

My heart is broken over the situation at Red Hill. It is hard to imagine that we have so completely squandered such a resource with so much recklessness and so little care. This problem goes far beyond the immediate contamination, as a [2018 risk assessment, conducted by the Navy's own contractors \(ABS\)](#), found that chronic, undetected releases are expected to total 5,803 gallons per year. TWENTY years ago, the rock under 19 of the 20 giant tanks were already stained with petroleum. Can you imagine the saturation after all these years?

We still don't know exactly how much fuel has been leaked and where the fuel plume is migrating to. There have been 72 documented leaks totaling nearly 200,000 gallons, which is almost certainly an underestimation. No one should be shocked by the current crisis – this is the logical conclusion to the dangerously foolish placement of massive fuel tanks above an aquifer. There is no safe way for the Navy to operate these badly corroded tanks and they need to be shut down.

I am pleading with this commission, to do everything in its power to protect our aquifer, one of our most important public trust resources. Please revisit, if not revoke, the Navy's water permits. They have shown us repeatedly that they cannot be trusted with this precious resource. I am very concerned about their current 5 MGD flushing plan. While this may be within their approved daily allotment, [a representative of the EPA could not confirm that this method would effectively clean the system](#). As we stare down likely water restrictions, and possible shortages, we cannot afford to let the Navy waste 5 MGD for the foreseeable future, especially if it's not even having the desired outcome. If you are not able or willing to revoke their permits, can you add conditions to them? Can you make their permits conditional on their compliance with the Dept of Health's executive order to defuel the facility?

If not now, when? The Navy has already caused significant damage to the resource and the threat for something far worse to occur continues to loom. And yet, the Navy continues to be opaque, and maintains their position that their fuel is more valuable than our water and lives.

The time is now, please, do anything/everything you can to protect this water, e nā kahu wai. We are counting on you.

Mahalo,
Shelley

From: [pete doktor](#)
To: [Hyatt, RaeAnn P](#)
Subject: [EXTERNAL] public testimony for 2/15/22
Date: Tuesday, February 15, 2022 8:44:28 AM

Aloha `Āina e Water Commissioners of Water Resource Management,

Māhalo for your commitment to protect our precious waiwai. Please use your authority to protect public health and safety by requiring DoD (Navy) permits contingent on the defueling and eventual permanent decommissioning of the underground Naval bulk fuel tanks at Kapūkaki.

Our `ohana has been really stressing out since the 2014 leaks if our daughter would suffer the same fate as children in Flint, Michigan, that have neurological developmental abnormalities due to government mismanagement, incompetency and human/systemic error, granted it actually been some 72 leaks since its construction and counting.

This is not an anti-military position but on the contrary also a matter of national security: what could be precious to our security than the water that sustains life on ka pae `āina:? My fellow homeowner association shares concerns with the recklessness of the Navy (and State enablers), and includes former Pearl Harbor contractor, active duty pilot and veterans, as myself. Aside from our personal experience with the military raising our distrust of military operations, we are appalled by the overall lack of integrity by the Navy that has put its own members and dependents at risk, let alone the rest of the local population that have been forced to endure this ticking time-bomb sitting over our aquifer.

Your intervention is imperative given your mandate. We don't even know precisely how much contaminants have leaked, nor where the fuel plume is migrating to, yet we still find the Navy withholding information. The Navy has also breached its credibility requiring CWRM to exercise everything within its power to act with urgency to protect this essential public trust for our great-grandchildren's great-grandchildren, as well as the multitude animals and plants that help sustain the ecosystem here for life. This is a "pro-life" issue, not "anti-military;" the US military (and RIMPAC) is the biggest security threat to these islands and requires civilian oversight as specified by the US Constitution.

Ē Mālama Pono,

Pete Doktor

Moanalua

Moanalua View Estates AOA, VP

Wai Ola Alliance

Veterans for Peace, Hawai`i Ch. 113 co-founder



February 15, 2022

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 Items D-1 and D-2 (Non-Action Items) - Status Update from Red Hill Permitted Interaction Group (The Group) on Scope of Investigation Approved at January 7, 2022 Meeting; and Presentations and Updates Related to Red Hill from various departments and agencies.

Dear Chair Case, and Commissioners,

Mahalo for this opportunity to offer these comments in support of the Permitted Interaction Group " (hereinafter "The Group") formed to address the water crisis triggered by the release of jet fuel from the U.S. Navy's Red Hill Bulk Fuel Storage Facility into the primary drinking water aquifer for the island of O'ahu. Earthjustice is a non-profit environmental law firm with decades of experience litigating cases to protect the public trust in Hawai'i's natural resources. Earthjustice's practice areas include restoring stream water to communities with cultural, subsistence, and environmental interests in ma uka to ma kai stream flow, and enforcing state and federal laws designed to protect public health and the environment.

Earthjustice appreciates The Group's work to synthesize what is currently known and unknown about the unfolding water crisis on O'ahu and affirms the Commission's authority to respond to this crisis. As outlined in the Water Code, the Commission is responsible for protecting Hawai'i's freshwater resources from pollution. The Water Code provides that

[T]he state water code shall be liberally interpreted *to protect and improve the quality of waters* of the State and *to provide that no substance be discharged into such waters* without first receiving the necessary treatment or other corrective action. The people of Hawai'i have a *substantial interest in the prevention, abatement, and control of both new and existing water pollution* and in the maintenance of high standards of water quality.

Haw. Rev. Stat. § 174C-2(d) (emphasis added).

Commission on Water Resource Management

February 15, 2022

Page 2

Earthjustice recognizes the immense strain that the emergency situation at the Red Hill Bulk Fuel Storage Facility is having on Commission resources, staff, and Commissioners. This matter is important and will require a lot of work. However, an expeditious decision on Red Hill would help minimize the interruption of other current matters before the Commission. The Commission's swift, decisive action on the Red Hill water crisis will help to preserve the Commission's overall capacity to address the myriad of other longstanding issues that require this Commission's expert resolution.

Thank you very much for your diligent oversight of the Navy's Red Hill Bulk Fuel Storage Facility. Earthjustice will continue to monitor this situation as it evolves.

Sincerely,

/s/ Marti Townsend

Marti Townsend

EARTHJUSTICE

From: [Patti Choy](#)
To: [Hyatt, RaeAnn P](#)
Subject: [EXTERNAL] Written Testimony for February 15, 2022, CWRM Meeting: Red Hill
Date: Tuesday, February 15, 2022 1:39:48 PM

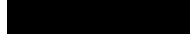
Dear Commissioners,

During this unprecedented time in which public trust in the Navy has been irreparably shattered by its handling of the on-going Red Hill disaster and the poisoning of our aquifer, I ask with all my strength that you be bold and brave and use your power to do the right thing for Hawaii's people, land and sea.

Please protect our precious aquifer and demand the Navy defuel and decommission the Red Hill fuel tanks and stop their water permits until this is done.

Mahalo.

Patrice Choy



Honolulu, HI 96822

Shut Down Red Hill