



# SIERRA CLUB OF HAWAI'I

Testimony to  
**COMMISSION ON WATER RESOURCE MANAGEMENT**

June 14, 2022      9 AM      Room 132

**COMMENTS on C-2:**

TAKE ACTION ON THE RECOMMENDED ACTIONS PROPOSED BY THE RED HILL PERMITTED INTERACTION GROUP TO THE COMMISSION ON WATER RESOURCE MANAGEMENT FORMED AND IN ACCORDANCE WITH THE SCOPE OF INVESTIGATION DEFINED UNDER ITEM B-1 AT THE JANUARY 7, 2022 MEETING, REGARDING THE RED HILL BULK FUEL STORAGE FACILITY EMERGENCY

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Aloha Chair Case and members of the Water Commission,

The Sierra Club of Hawai'i, on behalf of its 20,000 members and supporters, offers the following **comments** concerning agenda item C-2, highlighting the constitutional obligations and authority omitted by the permitted interaction group report and urging the Commission on Water Resource Management (CWRM) to consider any and all regulatory actions, including permit conditions, to ensure the protection of its public trust corpus.

As a preliminary matter, the Sierra Club notes that since the last CWRM meeting, a highly redacted report from a Navy contractor has nonetheless demonstrated that the years' worth of superficial assurances by Navy leaders and spokespeople regarding the safety and integrity of the Red Hill Facility have been **patently false**. With over 100 million gallons of fuel still perched a mere hundred feet over our primary groundwater source, and a contamination plume that is migrating within our aquifer in unknown directions – wholly due to the Navy's failure to develop promised groundwater and contaminant fate and transport models and a workable spill response plan – **there is absolutely no reason to repeat our past mistakes, and continue to take Navy leaders' assurances at face value.**

This same report has further, and most disturbingly, indicated that up to two years' worth of repairs may be necessary in order to safely defuel a facility that until November of last year was actively used to deliver fuel to Pu'uloa. As the Department of Health itself has found, this facility is "inherently dangerous" and is a "ticking time bomb" that threatens our primary drinking water source. **Two years – or longer – is far, far too long to allow a "ticking time bomb" to threaten our water and our very way of life.** With a Department of Defense FY2023 budget of over **\$770 billion**, there is no reason why this timeline cannot be significantly shortened through the appropriate reallocation

of human and financial resources and the expedition of procurement processes as would be done if the Navy and the Department of Defense treated this situation as the existential environmental, humanitarian, and national security emergency that it truly is.

In addition, as Navy representatives admitted in the last CWRM meeting, they have over-pumped their Waiawa shaft by over **365 million gallons** over the past year, including well before the current contamination crisis; are continuing to use up to 3 million gallons of water per day water for “irrigation”; and have no apparent plan to utilize the nearly 5 million gallons of “essentially drinkable” water a day (or **1.8 billion gallons** per year) that is being pumped from the Red Hill shaft and dumped into Hālawea stream, despite the months’ worth of time they have had to identify a less wasteful disposition of our public trust water. **Their blatant disregard for the essential nature of water, as well as state laws intended to protect our water, belies any assertion from Navy officials that they truly understand the importance of water to our islands.**

As the primary trust agency tasked with protecting and managing our islands’ most precious resource, CWRM must use any and all tools at its disposal to mitigate the existential threat of the Red Hill Facility and the impacts to our water supply and other water use permit holders that have and will continue to occur. Notably, the Hawai’i Supreme Court has found that **all** agencies have the broad authority and obligation to uphold the public trust, which includes the protection of the public trust corpus and the protection of waters in their natural state, **notwithstanding the lack of explicit statutory authority**.<sup>1</sup> For example, the supreme court has found that the public trust authorizes a county planning commission to impose public trust conditions in building permit applications for a water bottling facility.<sup>2</sup> **If a county planning commission making a building permit decision can take action to protect the public trust in water, there is no reason why CWRM cannot take actions, including through the imposition of water use permit conditions, that are reasonably tailored to ensure that the Navy and Department of Defense prioritize the need to defuel the Red Hill Facility and to address the ongoing contamination of our groundwater as a true emergency.**

Accordingly, the Sierra Club respectfully urges the Commission to go beyond the recommendations of the permitted action group, and not forego this opportunity to impose transparency and accountability conditions that will motivate the expeditious action needed to prevent disaster for ourselves and our future generations, before it is too late. This includes conditions that would require:

- 1) A comprehensive and quantified accounting of all water uses by the Navy water system, to be provided on a monthly basis, beginning no later than July of this year;

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<sup>1</sup> *In Re Water Use Permit Applications*, 94 Hawai’i 97 (2000), HAW. CONST. ART. XI SECS. 1, 4.

<sup>2</sup> *Kaua’i Springs, Inc. v. Planning Comm’n of Kaua’i*, 133 Hawai’i 141 (2014); *Kelly v. 1250 Oceanside Partners*, 111 Hawai’i 205, 224 (2006).

- 2) A plan, to be developed and submitted for approval by CWRM no later than August of this year, and with implementation to begin no later than September of this year, to cease the wasting of water from the Red Hill shaft, and to put such water to a reasonable beneficial use;
- 3) Unless and until the Red Hill Bulk Fuel Storage Facility is defueled and decommissioned, our groundwater aquifer is remediated, and the current contamination crisis is deemed resolved with respect to the impacts to our water resources:
  - a. No public trust water shall be used for uses by the U.S. Navy not essential to health and safety, including but not limited to landscaping, golf courses, swimming pools, car washes, or other inappropriate uses;
  - b. A 24-hour hotline shall be maintained by the Navy to help identify potential water waste and inappropriate uses of water from the Navy's water system, and any water waste complaints shall be addressed promptly; a monthly report of all hotline calls and detailed information regarding the Navy's response to such calls shall be provided to CWRM;
  - c. All reports and information relating to the contamination status of our groundwater aquifer shall be fully disclosed to CWRM **and the public**; and
  - d. A monthly **public briefing** and question-and-answer session shall be held for members of the public to ask questions to and receive answers from leadership from Indo-Pacific Command, Joint Base Pearl Harbor Hickam, NAVFAC, and other agencies tasked with actions necessary to defuel the Red Hill Facility, as well as any residential property managers with management authority over properties served by the Navy's water system.

Mahalo nui for your consideration of this testimony.

Sincerely,

A handwritten signature in black ink that reads "Wayne Tanaka". The signature is written in a cursive, flowing style.

Wayne Tanaka, Director  
Sierra Club of Hawai'i

**From:** [ann Wright](#)  
**To:** [Hyatt, RaeAnn P;](#) [DLNR.CW.DLNRCWRM](#)  
**Subject:** [EXTERNAL] COLONEL (RET) ANN WRIGHT'S TESTIMONY FOR THE JUNE 2022 MONTHLY MEETING OF THE HAWAII STATE COMMISSION ON WATER RESOURCES  
**Date:** Sunday, June 12, 2022 9:10:45 PM

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Thank you to the Hawai'i State Water Commission on Water Resources for the opportunity to testify at the June 2022 meeting.

I want to testify on Agenda item C. 2. Take Action on the Recommended Actions Proposed by the Red Hill Permitted Interaction Group to the Commission on Water Resource Management Formed and in Accordance with the Scope of Investigation Defined under Item B-1 at the January 7, 2022 Meeting, Regarding the Red Hill Bulk Fuel Storage Facility Emergency.

I'm no engineer but having been in the US military for 29 years, I can spot mismanagement and over expenditure of taxpayers' dollars by the US military.

I am very concerned about the Navy's waste of water of 5 million gallons a day that is being "flushed," sent down Halawa stream to Pearl Harbor and the ocean. This water should be used in some manner and not wasted.

I am also concerned that the military is not doing its part in water conservation during the summer with the civilian part of our community reducing their water consumption by 10 percent.

Additionally, I am very concerned about the amount of time the Navy is saying it will take them to make Red Hill safe enough to defuel to get jet fuel out of the tanks that is dangerously close to our water supply.

There is no need for the defueling and closing of the Navy's Red Hill Jet Fuel Storage complex to take a minimum of two years as projected in the May 27, 2022, contractor's assessment of the repairs needed.

The [\\$1.45 million dollar Simpson, Gumpertz & Heger report](#), with only the redacted version made available to the public, sheds light how badly managed and maintained the massive 80-year-old, 20 storage tanks, 250-million gallon facility located a mere 100 feet above Honolulu's water supply, had become. Yet, the Navy for decades and up until the late November 2021 catastrophe, was loudly proclaiming that the facility was safe.

The Navy's contractor, chosen by the Navy without notifying the Hawaii Department of Health as required in the DOH emergency order to ensure independence of the contractor, came up with over 200 recommendations for repair work to be done on the Red Hill tanks and 3.5-mile pipe system before defueling the giant tanks can begin. The contractor estimated that the repairs would take at a minimum TWO years.

The cost annex of the report that detailed the repairs needed was not provided to the

public. With the history of military contracting, one can surmise that the estimated cost will run into hundreds of millions of dollars.

BUT, the danger to Honolulu's aquifer from fuel leaking from the tanks exists now. We cannot wait for two years for massive repairs to the tank farm and pipe system, before removing the fuel when there are cheaper and faster alternatives to the probable extraordinarily expensive massive repairs called for by the report.

[Public trust in the Navy is very low](#) with many feeling that the Navy will "slow roll" the shutting down of Red Hill and use national security to continue operation of the Red Hill facility and imperil the remainder of Honolulu's water supply.

### **An Alternative Defueling Option**

The 100 million gallons of jet fuel currently in the tanks does not need to be piped down from Red Hill to the above ground fuel tanks at Pearl Harbor, some of which are over 100 years old. Nor does it need to go by the Red Hill pipe network to Hotel Pier at Pearl Harbor Naval Base to be put into ship fuel tankers.

A fast defueling solution is to make whatever repairs to the individual tanks valve configuration necessary to move the fuel out by a shorter pipe system to the Halawa entrance of Red Hill. The fuel would then be put into tanker trucks similar to the system used at commercial refineries that move fuel from above ground tanks for delivery to gas stations.

Fuel would NOT be pumped down to Pearl Harbor requiring the entire 3.5 miles of pipe to be repaired, but instead into 7,500 gallon commercial fuel tankers that would be staged at the Halawa entrance to the Red Hill complex.

The tank trucks would move the fuel to whatever site is designated: the above ground tanks at Pearl Harbor; Hotel Pier for ship fuel tankers which could be refueling the RIMPAC ships; or to PAR Hawaii above ground tanks in Kapolei that reportedly have a 60-million-gallon storage capacity.

If there are 50 tanker trucks each carrying 7500 gallons and each making 10 trips in a 24-hour period, they would move 3,750,000 gallons a day.

With 50 trucks working this schedule, with 3 union drivers working 8-hour shifts on each vehicle, they would move 3,750,000 gallons per day. **It would take 27 days to drain the 100 million gallons from Red Hill tanks, NOT TWO YEARS!!!**

If each trip costs \$500 and there are 500 trips per day, that would cost \$250,000 per day. 27 days of operation to move 100 million gallons would cost \$6,750,000.

The pitiful history of extraordinarily expensive military contracting would probably double the cost to \$1000 per trip, but that would make it \$13,500,000, no doubt much cheaper than any other proposal.

Even if the Navy would pay for only half that number of tanker trucks, it would take 25 trucks operating 24 hour days less than 2 months, only 54 days, to drain the 100 million gallons from the tanks at Red Hill.

If there are not sufficient fuel tank trucks on Oahu, the Navy could fly additional fuel tanker trucks into Hawaii similar to the airlift of the massive Granulated Carbon Activated tanks that "filtered" the fuel contaminated water at the residential areas around Pearl Harbor Naval Base and Hickam Air Base.

HELPFUL HINT: In case the Navy has trouble locating fuel tanker trucks, 15+ are for sale by [Opperman & Son, Inc.](#), 280 Kinley Dr., Healdsburg, California 95448, 855-419-1977.

This solution will get the dangerous fuel away from our aquifer much more expeditiously and I suspect, much less expensively than the long two-year repair of virtually all of the Red Hill Storage Tank system.

Thank You,

Ann Wright, Colonel,  
US Army (Ret)

[REDACTED]

Honolulu, HI 96826

[REDACTED]

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## Environmental Caucus of The Democratic Party of Hawai'i

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via email: [Raeann.p.hyatt@hawaii.gov](mailto:Raeann.p.hyatt@hawaii.gov) and [dlnr.cwrn@hawaii.gov](mailto:dlnr.cwrn@hawaii.gov)

June 14, 2022

Suzanne D. Case, Chair  
Members of the Commission on Water Resource Management  
Department of Land and Natural Resources  
DLNR Boardroom  
1151 Punchbowl Street, 1<sup>st</sup> Floor  
Honolulu, Hawaii 96813

### **Re: Red Hill Bulk Fuel Storage Facility Defueling and Decommissioning**

Aloha, Chair Case and Members of the Commission on Water Resource Management:

Thank you for this opportunity for the Environmental Caucus of the Democratic Party of Hawai'i (DPH) to provide comments relating to recommended actions proposed by the Red Hill Permitted Interaction Group to the Commission on Water Resource Management. The Advisory Group's initial scope of work includes: (a) Recommending potential permit modifications and conditions for the NAVFAC Hawai'i Water Use Permits; (b) Recommending potential permit modifications and conditions for other Water Use Permits, including the Honolulu Board of Water Supply, to immediately deal with the current water crisis and contamination event at Red Hill; (c) Investigating whether water shortage exists in the Pearl Harbor aquifer section area or Honolulu aquifer sector area pursuant to HRS §174C-62, and whether the Pearl Harbor Water Shortage Plan is activated and should be followed; (d) Reviewing proposed expansion of monitoring network of wells at Red Hill and propose recommendations as appropriate; (e) Identifying financial and in-kind contributions the Navy can provide to the Ko'olau Watershed Partnership that promote Aquifer recharge to offset groundwater system losses due to the presence or risk of contamination from the Red Hill fuel Bulk Facility; (f) Identifying additional staff positions needed by CWRM to monitor and mitigate impacts of the Red Hill Fuel Bulk Facility and seek commensurate funding from the Navy; and (g) Reviewing the legal options the Commission can pursue.

In furtherance of this scope of work are the following considerations: (1) the short- and long-term effects of leaks of the fuel tanks, including effects relating to the health of residents, safe drinking water, and the environment; (2) response strategies to mitigate the effects of leaks from fuel tanks; (3) methods to improve communication between the United States Navy, Air Force, and Army; the State; any local board of water supply, and the public in the event of leaks from any fuel tank; (4) groundwater test results in the areas surrounding the fuel tank facilities, with a particular emphasis on the groundwater near the Red Hill Bulk Fuel Storage Facility; (5) the implications of shutting down any fuel tank facility; and (6) updates on progress toward meeting goals of agreement between the State, the affected county, and the federal government.



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The Democratic Party of Hawai'i (DPH) has an enrolled membership of close to 140,000 active and associate members in the State of Hawai'i. The Environmental Caucus of the Democratic Party of Hawai'i is a semi-autonomous organization within the Party that advocates and advances the Platform and Resolutions adopted by the Party's members at the Democratic Party's State Conventions and County Democratic Conventions.

We emphasize the massive size and dangerous nature of the Red Hill USTs. They were built during World War II, 80 years ago. There are 20 tanks, 18 in operation (each 100 feet in diameter, and 250 feet in height, each tank capable of holding 12.5 million gallons of fuel), capable of holding 250 million gallons of fuel in total when all 20 tanks are utilized. These tanks sit merely one hundred feet above the primary drinking-water Moanalua-Waimalu aquifer in the City and County of Honolulu. The fuel tanks are composed of rusting, thinning steel, crumbling in many places, encased in porous concrete, that are highly susceptible to spontaneous leakage due to years of corrosion, lack of routine inspections and general overall sporadic maintenance. We also emphasize that accumulated evidence shows that the Facility's blueprints are inaccurate and incomplete, and that Navy personnel, who usually rotate in and out on two-year cycles, simply DO NOT know the hidden complexities of the many pipelines, tunnels, and other details of the system. Institutional knowledge is very poor. This is a key factor underlying many "operator errors" that are blamed for spills and leaks. The same could be said for the 2.5 miles of pipelines that gravity pulls the fuel from the Red Hill Fuel Tank Facility to the Harbor pier at Pearl Harbor. These pipelines are aged and lack regular periodic inspections and general maintenance. Oftentimes, fuel is erroneously mixed in water pipes and water is erroneously mixed in fuel pipes as not all pipelines are known, as we have seen in the fuel and water spill that caused the contamination to the water pipes that led to military homes and some non-military homes poisoning drinking water to 93,000 military residents on the Red Hill well in November 2021.

Generally, the concern focused on the Red Hill Fuel Tank Facility has usually centered around the tanks themselves. However, as recently as a year ago, on May 6, 2021, a release of "1,618 gallons" of jet fuel from a distribution pipeline occurred, with the Navy claiming that only 38 gallons of the released fuel was lost. While the Navy's containment system "properly monitored, detected and collected the fuel release as designed," this still adds an additional factor, often overlooked by the public and environmental groups, that not only must we be concerned with the eroding tanks but we must also be more concerned with the gravity-fed pipeline and other accessory structures that pose additional risks of releases. The Red Hill tanks are connected to three gravity-fed pipelines that run 2.5 miles inside a tunnel to fueling piers at Pearl Harbor, all of which pose points of releases throughout the 2.5-mile distance.

In addition, from March 2020 to May 2021, approximately 7,100 gallons of fuel were recovered from the water and soil of Pearl Harbor, which likely included a mixture of new and older sources. In January 2020, a Navy pipeline failed two leak detection tests, yet the Navy officials failed to report these failures to the DOH for another three months. This is just one discovered plume. Navy records show that there are numerous plumes of leaking fuel in Pearl Harbor. It is astonishing to learn that this "newly" reported plume is just the tip of the iceberg and yet the Navy continues to act in a manner that lacks good faith as transparency of the Navy's records to the stakeholders and the community necessitated a lawsuit in order to obtain full disclosure of these fuel leaks. (And we are never sure that "full disclosure" has truly been "full.")





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As we have recently seen, the Red Hill tanks cannot be operated in a manner that is protective of our groundwater.

As should be very clear from the record, the 2014 release of 27,000 gallons of fuel from Tank 5 was by no means the only release. A release from Tank 6 was reported by the Navy in 2002. Tanks 15 and 16 also had fuel releases after 1988, according to a Navy report in 2014. The Navy TRIM report in 2016 indicates that Tank 5, Tank 10, Tank 17, Tank 19, and Tank 20 underwent inspections after 1988 that identified through-wall corrosion and possible leaks below the detection limit. The groundwater data from 2005 to the present show petroleum chemical contaminants in groundwater samples. Petroleum staining was found in cores taken before 2014 beneath Tanks 19 and 20. (See AMEC Report, 2002.) Further, the Navy's Red Hill Facility Groundwater Protection Plan (GWPP) report documents leaks from various tanks from 1940s through to the 1980s (Navy report, 2008.)

These leaks cannot be "cleaned up." The water will simply be rendered undrinkable for anyone – civilians and military. Alarming, the Navy itself affirmed that there is a 27.6% chance of the tanks leaking up to 30,000 gallons of fuel every single year. Many studies have detected petroleum contamination in the groundwater beneath the tanks. Since their construction in the 1940s, it is believed that the tanks have leaked more than 178,434 gallons of fuel. This latest November 2021 spill of 19,000 gallons and the Navy's recovery of 100 gallons after three months of skimming the wells by Navy divers prove that the 80-year-old Red Hill fuel tanks and pipelines pose a serious threat to drinking water for hundreds of thousands of residents, visitors, and businesses, and there are no viable safeguards now that the Aquifer is contaminated.

The Democratic Party of Hawai'i recently adopted the following Resolution at its Biennial State Convention on May 27-28, 2022:

**2022-11 Demanding that the Red Hill Fuel Tanks and Pipeline Infrastructure be  
Expediently Decommissioned and New Monitoring and Exploratory Wells be  
Immediately Developed**

*Whereas, The risks posed by the 180 million gallons of fuel stored at the U.S. Department of the Navy's Red Hill Underground Fuel Storage Facility concern 20 tanks and the pipelines that transport the fuel stored at Kapukaki to the fueling piers in Pearl Harbor, each built in the 1940s and suffering from corrosion and other wear and tear that increases the risk of fuel spills; and*

*Whereas, A 2015-2016 assessment of the 2.5-mile pipeline system, published in September 2016 but only newly disclosed, found that the pipelines needed 350 repairs, including 230 categorized as needing to be fixed immediately, 181 of which are still unresolved as of April 2022; and*



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*Whereas, The State of Hawai'i Department of Health seeks to require the Navy to defuel its tanks per the Emergency Order dated December 6, 2021, after jet fuel releases earlier that year contaminated the Navy's Red Hill well for 93,000 military families and residents at the Joint Base Pearl Harbor-Hickam and surrounding neighborhoods, where they complained of fuel odors from their taps, and suffered skin rashes, burns, and painful gastrointestinal symptoms; and*

*Whereas, The extensive corrosion within the Navy's pipelines and tanks, and the inconsistent tank inspection process that has failed to inspect certain tanks for over 20 and in some cases over 40 years, has resulted in dozens of fuel releases totaling in excess of 175,000 gallons over the life of the facility, posing serious, even existential threats to humans and the environment; and*

*Whereas, Making up for the closure of the Honolulu Board of Water Supply's Halawa Shaft and Halawa and 'Aiea Wells requires a very lengthy permitting and development process of 2 to 5 years, including drilling and testing exploratory wells to define and confirm efficient use of the groundwater aquifer resource before commencing the full build-out and installation; and*

*Whereas, The Secretary of Defense ordered on March 7, 2022 the permanent closure of the Red Hill Fuel Tank Storage Facility, and issued a memo stating that "By no later than May 31, 2022, the Secretary of the Navy and Director of the Defense Logistics Agency will provide me with a plan of action with milestones to defuel the facility;" now therefore, be it*

*Resolved, That the Democratic Party of Hawai'i instructs Members of the Hawai'i Congressional Delegation and State Legislature to demand and ensure that the Navy safely, diligently, and expeditiously defuels, dismantles, and decommissions the Red Hill Facility and its 2.5-mile pipeline system, decontaminates the soil and groundwater, and, to the extent possible, decontaminates affected portions of the Southern O'ahu Basal Aquifer in compliance with the Clean Water Act, all on a specific schedule to be provided to the State of Hawai'i as soon as possible; and be it further*

*Resolved, That the Democratic Party of Hawai'i urges the State Legislature, Mayor of Honolulu, and Members of the Honolulu City Council to ensure that all properly completed applications for State approval for drilling new exploratory and development wells for the Honolulu Board of Water Supply to replace unusable water supply wells be processed expeditiously to help compensate for the loss of the BWS Halawa Shaft and other wells due to aquifer contamination by the Navy at the Red Hill Shaft; and be it*



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*Ordered, That copies of this resolution be transmitted to the President of the United States, Secretary of Defense, Commander of the Indo-Pacific Command, Director of the Defense Logistics Agency, Administrator of the Environmental Protection Agency, Members of the Hawai'i Congressional Delegation, Governor and Lieutenant Governor of the State of Hawai'i, Members of the Hawai'i State Legislature, Mayor of the City & County of Honolulu and Members of the Honolulu City Council, and Director of the Hawai'i Department of Health.*

[End of Quote]

To be in compliance with the Governor's second Emergency Order, dated May 6, 2022, to defuel and permanently decommission the Red Hill Fuel Tank Facility, the Navy provided its independent contractor's assessment on facility operations by May 15, 2022 and, a plan and implementation schedule to defuel by June 30, and a plan for closure of the facility by Nov. 1.

On May 13, 2022, the independent third-party, Simpson Gumpertz & Heger, Inc.'s assessment determined, among other things, the following findings:

- Major extensive and critical structural repairs are needed for the piping and distribution system including the three pipelines that run through an underground tunnel and lead to fueling piers at Pearl Harbor and Hickam Airfield to enable safe defueling and minimize risk of another spill.
- The necessary repairs will be extensive, involving the entire distribution system. The repairs include deteriorating and aging pipelines, and corrosion and faulty valves. The report details more than 200 repairs that would be needed to safely operate the facility, including about three dozen that are critical before defueling. The most significant repair involves the lower access tunnel adjacent to the Red Hill tanks where surge analyses are necessary along the pipelines; dresser couplings used to connect the pipes need to be protected; corroded piping needs to be repaired; and damaged coating and pipe supports need to be fixed, among a long list of other repairs including heavily corroded structural columns and pipes, concrete cracking and spalling, leakage through the concrete tunnel walls and floor and valves known to leak. There is also a need for lead abatement.
- The Navy needs to develop written additional procedures for normal and emergency operations for its personnel to reduce the risk of a release and fire. There are fire risks as cabinets holding flammable materials are not anchored to the floor, and a control room in the pump house is not blast-resistant. In addition, in the event of an earthquake, the emergency generator may lose functionality.
- Operating personnel must receive additional training to prevent spills, safely operate, and respond to emergencies.



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- An estimate of the time needed to complete these actions is still forthcoming. However, the Navy reiterated earlier estimates that the process of defueling the Red Hill tanks will take about a year or two once repairs are complete.

In conclusion, given that (1) O'ahu's sole-source groundwater aquifer provides critical drinking water supplies that simply cannot be replaced; (2) an enormous amount of fuel (currently 187 million gallons of fuel; however, the Tank Farm has a total fuel capacity of 250 million gallons) is stored merely 100 feet above the major drinking-water aquifer that lies in saturated volcanic rock; (3) petroleum chemicals have repeatedly been released and detected in groundwater and rocks underneath the tanks; and (4) the 200+ extensive and critical repairs to the three pipelines from Red Hill to the Pearl Harbor and Hickam fueling stations necessary to safely drain the 187 million gallons of jet fuel, marine diesel, and other petroleum constituents, it is incumbent that the Commission on Water Resource Management advocate to decommission the Red Hill Facility in its entirety and to relocate the fuel to state-of-the-art above-ground tanks in an area where such fuel storage will not pose a "clear and present danger" or cause an "imminent and substantial endangerment (ISE)" to human health and the environment by further contaminating Honolulu County's drinking water aquifer.

Mahalo for this opportunity to provide public comments on this very critical matter.

*Melodie Aduja*

Melodie Aduja

Co-Chair, Environmental Caucus of the Democratic Party of Hawai'i

Email: [legislativepriorities@gmail.com](mailto:legislativepriorities@gmail.com)

*Alan B. Burdick*

Alan B. Burdick

Co-Chair, Environmental Caucus of the Democratic Party of Hawai'i

Email: [burdick808@gmail.com](mailto:burdick808@gmail.com)

CWRM Meeting: June 14, 2022

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

Re: Agenda Item D-2 Take Action on the Recommended Actions Proposed by the Red Hill Permitted Interaction Group to the Commission on Water Resource Management Formed and in Accordance with the Scope of Investigation Defined under Item B-1 at the January 7, 2022 Meeting, RE: the Red Hill Bulk Fuel Storage Facility Emergency

Good afternoon Chair Case and members of the Water Commission,

My name is Rebekah Garrison and I am a community organizer with Hawai'i Peace and Justice and a member of the O'ahu Water Protectors and the Shut Down Red Hill Coalition. I would like to begin by thanking the Commission On Water Resource Management for the opportunity to submit testimony on this urgent matter and for the Commission's steadfast oversight of the Red Hill Bulk Fuel Storage Facility and the ensuing crisis the navy continues to place us all in.

At this juncture in the navy's belligerent mishandling of Kapūkaki—also widely known as Red Hill—it is well documented in the court of public opinion that the people of Hawai'i and many of the navy's own employees do not trust the military and their so-called leadership with respect to Kapūkaki. And, so we look to all of you to prioritize the protection of the island's most precious resource: clean, unpolluted drinking water. Hawai'i Peace and Justice strongly supports more robust permit conditions for the NAVFAC Hawai'i Water Use Permits, an appropriate response to the navy's egregious acts of violence against the people of Hawai'i's public trust and O'ahu's sole-source aquifer. To be clear, no body, institution, corporation, or organization in Hawai'i, much less roving federal agents lacking commitment to the environment and people of Hawai'i, is above the law. We, the public, and in the name of the trust you swore to protect, encourage the Commission to enforce navy compliance with public trust water resources.

As a result of the navy's inferior capability to properly care for the people of Hawai'i's public trust, we encourage the Commission to not only modify navy water use permits, but also, mandate the navy restructure its relationship to the Commission by enforcing strict conditions of accountability. Such accountability measures may include, but are not limited to, 1. holding the navy responsible for the water crisis at Kapūkaki by restricting navy water usage to address waste, over-pumping, and shortages. For example, navy water conservation efforts should mirror measures imposed on the public. 2. The navy's permitted water use limit should be reduced by the same amount of water that is pumped from the aquifer and released into Hālawa Stream. 3. Navy failure to adhere to state water protection plans should result in exorbitant daily penalties and increased conditions placed on navy access to public water resources. 4. We call on the Commission to require navy transparency with respect to public engagement. And, lastly, 5., require the navy to provide financial support to all those restoring the watershed that replenishes the groundwater and wetlands at Pu'uloa.

Sincerely,

Rebekah Garrison, Hawai'i Peace and Justice

**From:** [Dylan Ramos](#)  
**To:** [DLNR.CW.DLNRCWRM](#)  
**Subject:** [EXTERNAL] Testimony for Action Item 2 Red Hill  
**Date:** Monday, June 13, 2022 5:28:01 PM

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Aloha,

While I appreciate recommendations regarding the Navy's environmental and fiscal responsibilities, as a lifelong resident of Honolulu I must state my support for a full shutdown of Red Hill. No amount of sampling, contingency planning, or even remediation will be enough if the base threat remains. So yes, do what you must to protect us in the short term, but make clear that the federal government should also be budgeting for a full shutdown in every appropriations process until the problem is removed, and following through or being held accountable.

Mahalo,  
Dylan Ramos

**From:** [Kelsey Amos](#)  
**To:** [Hyatt, RaeAnn P](#)  
**Subject:** [EXTERNAL] Testimony  
**Date:** Monday, June 13, 2022 8:42:08 PM

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Aloha Chair Case and members of the Water Commission,  
My name is Kelsey Amos and I am a resident of Honolulu. I am testifying today regarding agenda item C-2.

Seven months after the Navy poisoned thousands of O'ahu residents, the Red Hill fuel tanks remain a massive threat to our water security. I kindly urge the Commission to uphold its obligation to the public trust and use its constitutional authority to expedite the defueling and decommissioning of the Red Hill Bulk Fuel Storage Facility. We cannot wait at least another two years to know our water is safe.

Aloha,

Kelsey

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Kelsey Amos, PhD  
she/her  
Co-founder, [Purple Mai'a](#)  
808-██████████ (cell)

**From:** [Patti Choy](#)  
**To:** [Hyatt, RaeAnn P](#)  
**Subject:** [EXTERNAL] Red Hill  
**Date:** Monday, June 13, 2022 9:08:02 PM

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Dear Commissioners,

Please do everything within your power to ensure the Red Hill fuel tanks get drained and the entire facility is decommissioned immediately.

We, including yourselves, are facing a catastrophe of unfathomable proportions when it comes to our drinking water. I hope you feel compelled to do the right thing for today and for future generations by securing and protecting our natural source of pure water.

Thank you.

Patrice Choy  
Honolulu

--

Patrice

Shut Down Red Hill



**From:** [REDACTED]  
**To:** [Hyatt, RaeAnn P](#); [Manuel, Kaleo L](#)  
**Subject:** [EXTERNAL] Red Hill  
**Date:** Monday, June 13, 2022 11:31:16 PM

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I won't manage to get testimony in on time.  
The only thing the State should be demanding of the Navy other than immediate defueling is the aquifer remediation! Exactly right!

-- me ke aloha pumehana, Charley



*Restore the Commons*

**From:** [Hayden Kasal-Barsky](#)  
**To:** [Hyatt, RaeAnn P](#)  
**Subject:** [EXTERNAL] Testimony  
**Date:** Tuesday, June 14, 2022 10:12:23 AM

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Aloha Chair and members of the Water Commission,  
My name is Hayden Kasal-Barsky and I am a resident of Oahu. I am testifying today regarding agenda item C-2.

Seven months after the Navy poisoned thousands of O'ahu residents, the Red Hill fuel tanks remain a massive threat to our water security. I kindly urge the Commission to uphold its obligation to the public trust and use its constitutional authority to expedite the defueling and decommissioning of the Red Hill Bulk Fuel Storage Facility. We cannot wait at least another two years to know our water is safe.

Sincerely,  
Hayden Kasal-Barsky

**From:** [pete doktor](#)  
**To:** [Hyatt, RaeAnn P](#)  
**Subject:** [EXTERNAL] CWRM public testimony 6/14/22  
**Date:** Tuesday, June 14, 2022 12:04:06 PM

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Aloha e Council Members of the Water Commission,  
As an `ohana living in Moanalua just across AMR, I am testifying in regards agenda item C-2.

The latest Red Hill related fuel leaks just in the last seven months has only confirmed our fears that started during the 2014 massive leak. I have had the misfortune of meeting some of the impacted family members and have seen the pain and suffering inflicted on families including children, that has prompted this testimony: I don't want to see more people hurt, my `ohana and otherwise.

Still, months have passed since the latest military poisoning of thousands of our community neighbors, and the Red Hill fuel tanks continue to impose an imminent threat of catastrophic release, as even Navy's studies confirm as inevitable over time.

I respectfully urge the Commission hold steadfast its kūleana to this public trust and utilize its constitutional authority to expedite the safe defueling and decommissioning of the Red Hill underground storage tanks and delivery system. We will never be safe until these tanks are emptied -- till then, we feel as hostages of collateral damage that has yet to be prioritized by Federal government entities, so we are counting on you to represent the people -- for past, present and future generations, to protect our true wealth, our waiwai.

Ē Mālama Pono,

Pete Doktor

Moanalua, O`ahu