

August 14, 2023

To: Commission on Water Resource Management  
From: Norman Rizk, President of West Molokai Homeowners' Association  
(811 lots, condos, and homes)  
Regarding: Water Allotment to West End of Molokai

Aloha Commission Members:

I am writing to express the collective views of our large membership (811 stakeholders) of owners, comprising about 2000 owners and family members. The entire population of Molokai is estimated in 2023 to be about 7345, so our members do represent a sizeable proportion of interested parties and water users on Molokai.

Despite our numbers we are currently allotted only about 5% of Molokai's water, provided through Molokai Public Utilities (MPU), a utility owned by a corporation domiciled in Hong Kong, Molokai Properties Limited (the "Ranch"). Management at the Ranch is forced to make decisions based on their owners' financial goals, not on the rate payers' needs. We are provided only very expensive potable water (\$7-8/1000 gallons). Because our Papohaku Ranchland lots are zoned agricultural, farm plans that dedicate 51% of the land to agricultural uses must be approved in order to obtain a building permit. This is nearly impossible to devise without agricultural water provision.

Townscape's initial draft plan, as they graciously acknowledge in their planned report to you today, seriously underestimated our water needs. I understand that about 150 emails and letters were sent to Townscape from the West End after the first draft of Townscape raised serious concerns. Otherwise, their report compiles many valuable data to help in your eventual decision, and we are grateful for their work in a very contentious environment. We, however, want to make it clear that the West End's needs are legitimate, much larger than originally projected; and also make it clear that proposed uses of the water on the West End are consistent with the goals of the larger community as expressed in the Molokai Community Plan. Originally, 50 years ago, the West End development plans were those of a high-end resort. Over time, as overseas foreign-national owners' plans failed, the West End has morphed into a community that shares many characteristics of the rest of the island. Our HOA just revised its CC&R's to encourage, rather than prohibit, commercial agriculture. Almost all of our owners do not want a densely populated resort with widespread commercial franchises. They bought on Molokai to be on an island with traditional values and lifestyle, not one with raucous bars, discos, or very expensive restaurant venues. I've been on Molokai for 23 years and, to my relief, am yet to see a private jet at the airport.

A recent survey of our members overwhelmingly stressed the need for adequate water, including most prominently agricultural water. 87 owners of larger (7-20 acres) lots, about 460 acres, want to use water for commercial agriculture, reforestation, erosion control, and livestock. Reforestation and erosion control would mitigate the devastating run-off due to the disastrously large ungulate population trampling the land, and protect the reef currently being silted out after every rain. Using the HDOA estimates of 3900 gpd per acre for general ag use, more than 1 million gpd of ag water would be required when fully developed. In addition, more

unsold lots will come on-line. The Molokai Community Plan also calls for thoughtful redevelopment of the former 2 hotels on the West End, previously the biggest employer on the island. Since the Ranch is for sale, some limited eventual re-development might also require water.

Our proposal would be to grant an appropriate amount of ag water to the West End, to allow the small scale commercial ag, reforestation, and erosion control our owners need. Figuring out the financing, possibly with federal infrastructure funding, would be the next step. This would also solve the current litigation over well 17 and the Kualapu'u aquifer disputes, since potable water for the West End could be somewhat decreased, using more appropriate ag water for planting, rather than the current expensive and limited potable water.

I appreciate your attention to these crucial matters. There are many opportunities if we can set aside our differences and work for the common good.

**From:** [Peter Johnson](#)  
**To:** [Kaaa, Iwalani HR](#)  
**Subject:** [EXTERNAL] Molokai water allocations  
**Date:** Monday, August 14, 2023 10:41:52 AM

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To Whom It May Concern:

My wife and I are full-time residents on Molokai's West End. We understand that there is a plurality of legitimate interests in the allocation of Molokai's limited water resources. We ask only that decision makers take account of the conundrum that most owners of vacant land on the West End on the are not permitted by County zoning to build homes unless they commit most of their property to commercial agricultural use, notwithstanding the fact that no agricultural water is available—a situation that only puts incremental pressure on limited potable water resources, and leaves would-be West End farmers at an insurmountable competitive disadvantage.

Sincerely,

Peter Johnson

Aloha, Members of the Commission,

Please allow me this opportunity to express the deep concern and high anxiety being felt throughout the population of the West End of Moloka'i regarding the allocation quantities being considered under the Moloka'i Water Plan. The first draft of that plan included very low allocated volumes and significantly restricted growth rates which could not possibly support the current properties anticipated needs, as they develop, let alone the amounts necessary to meet the additional responsible development goals, as laid out in Moloka'i Community Plan. Thankfully Townscape has acknowledged that some of the early work done, accidentally resulted in seriously underestimated projected needs and they anticipate correcting that in future drafts, after the one being presented at your August 15, 2023 meeting.

There is one element of the challenge on the West End that solving could actually solve problems for residents in other areas as well. Currently there is no Ag water available on the West End, but a large need for it. That leaves us having to draw all water needs from well 17. If Ag water was made available to the West End, less potable water would need to be drawn from well 17, presenting less stress on that supply and thus more water from it would be available to other users. A win/win for numerous stakeholders, that often find themselves with competing interests. Ag water on the West End would go a long way to bringing all Molokai communities together with common water preservation and environmental protection goals.

In closing, let me thank you for your consideration of our needs and for your enabling us on the West End to offer input through our testimony.

Mahalo Nui Loa,

Jeff Kent,  
President, West Molokai Resort AOA

Robert Stephenson  
PO Box 56  
Maunaloa, HI 96770-0056  
[mkkrob@me.com](mailto:mkkrob@me.com) – 808-658-0608

**August 14, 2023**

**To:** Commission on Water Resource Management  
**From:** Robert Stephenson, Vice President, West Molokai Homeowners' Association  
(Representing 811 lots, condos, and homes)  
**Subject:** Water Provision for West Molokai

Aloha Esteemed Commission Members,

As West Molokai Association Vice President and an integral part of the West End Community, both as a landowner and a full-time resident, I wish to amplify the concerns expressed by our President, Mr. Norman Rizk, concerning the proposed water distribution for MPL and its customers on the West End of Molokai.

The West End is home to numerous local families, like my own, that have been deeply rooted in the community for generations. Our collective vision is to ensure a prosperous and secure future for not just our children and grandchildren, but also for the many generations to follow. A fundamental aspect of this future is reasonable and stable access to both agricultural and potable water.

While the intricacies of the current water challenges might not be entirely clear to us, we recognize the potential in collaborating with fellow community stakeholders to develop solutions that respect and address the varied needs of all parties involved.

With that, I assure you that the West Molokai Homeowners' Association remains a devoted collaborator, eager to contribute positively to the ongoing discussions. We welcome any guidance on how best we can aid in your deliberations and ultimate decisions.

Kindest regards,



Robert Stephenson  
Vice President, West Molokai Homeowners' Association

**From:** [REDACTED]  
**To:** [REDACTED] [DLNR.CW.DLNRWORM](#)  
**Subject:** [EXTERNAL] RE: Molokai Water Plan Presentation August 15 2023  
**Date:** Tuesday, August 15, 2023 4:08:52 AM

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This is a copy of comments which I provided to Sherri Hiraoka at Townscape on August 13, 2023:  
Please accept this as my written testimony for today's meeting.

-----Original Message-----

**From:** [REDACTED]  
**Sent:** Sunday, August 13, 2023 7:46am  
**To:** "Sherri Hiraoka" <Sherrihiraoka@townscapeinc.com>  
**Subject:** Molokai Water Plan Presentation August 15 2023

Aloha Sherri,

Mahalo for prayers for those touched by the Maui fires. I have close friends who are still waiting for news on a loved one.

These fires remind us that sufficient water allocation is essential to protect Molokai. Your Molokai Water Plan Presentation for August 15, 2023 Summary of Comments addresses two of my comments on your Draft (non-potable water and reforestation) which are important to keeping Molokai safe from wildfires. My hope is that allocations will be made available to this end. Your response to "Water demand projections for Kaluako'i are insufficient" is encouraging.

Papohaku Ranchland owners want non-potable water so that we can operate commercial agriculture and/or reforestation and land restoration, which can and will reduce the risk of wild fires. West Molokai has lost most of grasses and trees. Restoration cannot be accomplished without non-potable water.

To provide sufficient water to the West End would be Molokai taking care of its own.

Sincerely,  
Peggy Lucas Bond  
Treasurer, Papohaku Homeowners Association  
[REDACTED]

**From:** [REDACTED]  
**To:** [REDACTED] [DLNR.CW.DLNR.CWRM](#)  
**Subject:** [EXTERNAL] Fw: Molokai water plan  
**Date:** Tuesday, August 15, 2023 4:11:30 AM

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Below is a copy of comments which I provided to Sherri Hiraoka at Townscape on August 13, 2023:  
Please accept this as my written testimony for today's meeting.

----- Forwarded Message -----

**From:** [REDACTED]  
**To:** Sherrihiraoka@townscapeinc.com <sherrihiraoka@townscapeinc.com>  
**Sent:** Sunday, August 13, 2023 at 11:58:07 PM EDT  
**Subject:** Molokai water plan

Dear Sherri,

I seriously question the validity of Townscape's presentation to the CWRM, specifically regarding allocations for West End water. While the presentation admits that its estimates for the West End in the original draft plan were insufficient, it ducks the issue of necessary allocation amounts, which are essential.

It is imperative that the West End be allocated equitable and sufficient water, both potable and agricultural, when CWRM makes its decision. If not, CWRM can look forward to years of litigation and disunity. The West End clearly needs more water, both agricultural and potable, and it is not reasonable for CWRM, nor for Townscape, to reject it.

It is also ludicrous to oppose the transfer of water from one Molokai watershed to another. To do so nationally would shut down the water supply of much of America. For four years I was project manager of a 350-square-mile watershed management plan in California, and can testify that the process of watershed transfer is as old as civilization, and uniquely linked to viable human agricultural development.

On the West End we are facing the same fire conditions as Maui. Long-term mismanagement and ecological destruction by Molokai Ranch, and their Chinese overseers and predecessors, has led to the spread of highly invasive and inflammable non-native grasses and kiawe forests which do not sustain normal water transfer into the soil, and thus have led to wildfire dangers unprecedented in recent decades. And it is therefore essential that the West End, without the assistance of Molokai Ranch, which avoids all responsibility and response, to address this problem. And without sufficient water resources we cannot.

We need our ag water in volume for non-potable uses including tree restoration, replanting of native grasses and other vegetation, landscaping, and for the livestock and fruits and vegetables which we can then sell into Molokai markets to grow and sustain Molokai agriculture for the people of Molokai. Why should we be buying beef, lamb, pork, poultry, fruit and vegetables shipped from California, when we can grow them better, more nutritionally, on Molokai?

In this crucial matter, it should not be the extremists who push Townscape to its irrational position. The extremists may show up loudly in meetings, but they do not represent the people of Molokai. Most of our Molokai ohana, and of our friends, neighbors, and allies, are very busy raising their families, working hard, and trying to keep life going. They do not have time to rant in public meetings or sign petitions. But these are the true citizens of Molokai.

I live on the West End but my ohana of several hundred Hawaiians lives on nearly all our islands. One of my ancestors created the first girls' school in Hawaii and the second boys' school, He brought macadamia nuts to Hawaii and freedom to the people of the Big Island. Another of my ancestors was the first medical doctor on Hawaii; he kept a horse always saddled in the hut outside his house, in case in the middle of the night somewhere forty miles away a woman was having trouble in childbirth, or someone had a broken leg, an infant with a cough.

This is what we are, we Hawaiians. We take care of each other. The West End contributes much of the economic power and cultural diversity to Molokai. Thus to penalize the West End is to penalize us all.

At this time of this atrocious tragedy on our beloved sister island, it is not *pono* to drive us Hawaiians apart, but rather for us all to stand together as the one people we are.

Please give us the water that we, and Molokai, need to survive.

Mike Bond

Author of *Saving Paradise*, the best-selling book that helped save Molokai from the wind turbines, and a founding member of *I Aloha Molokai*.

[REDACTED]  
Kaunakakai, HI 96748  
[REDACTED]



**From:** [REDACTED]  
**To:** [DLNR.CW.DLNRCWRM](#)  
**Subject:** [EXTERNAL] Comments to CWRM regarding the Molokai water plan  
**Date:** Tuesday, August 15, 2023 8:39:58 AM

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Aloha,

My name is Marshall Racine. My wife and I have lived on five acres in the Papohaku Ranchlands for twenty years. We care for horses that others have given up on.

We have recently started growing food for ourselves and neighbors in old kennels. Our dogs have all passed. The next project will be much more ambitious.

We use a moderate amount of water for our domestic animals and have a number of troughs for the wild ones. We expect our demand to double with the gardens.

The County of Maui requires a farm plan that includes 50%+ of the land be used for agricultural purposes.

The first draft of the Water Management Plan restricts our domestic water allocation and makes no allotment for agricultural water.

This make no sense.

Right now, there is no infrastructure for agricultural water. That can be changed with time and money for engineering.

A survey of the Papohaku Ranchland owners was conducted and it indicates that a majority of the owners would increase agricultural use if water were available.

No pipes in the ground is no excuse for not allocating water for the west end.

Thank you for the opportunity to comment.

Respectfully,

Marshall Racine

Sent from [Mail](#) for Windows

**From:** [REDACTED]  
**To:** [REDACTED] [DLNR.CW.DLNR.CWRM](#)  
**Subject:** [EXTERNAL] Townscape Molokai Water Plan Study  
**Date:** Tuesday, August 15, 2023 8:41:29 AM

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As residents of the West End of Moloka'i we would like to thank Townscape for their work and especially their listening to all the voices on Moloka'i to help develop a water plan that serves all of Moloka'i.

The water needs of the West End are real and if Moloka'i is to carry out the Adopted Moloka'i Island Community Plan (2018) and protect the land and ocean shores of Molokai for future generations, the water needs of the West End must be addressed. We thank Townscape and the CWRM for continuing to work on this important Water Plan for all of Moloka'i.

**From:** David Denecke <[REDACTED]>

**Sent:** Wednesday, August 16, 2023 9:52 AM

**To:** Kaaa, Iwalani HR <[REDACTED]>; Sherri Hiraoka <[REDACTED]>; Norman W. Rizk, MD Berthold and Belle N. Guggenhime Professor, Emeritus (m) Rizk <[REDACTED]>

**Subject:** [EXTERNAL] Molokai Water Plan

August 16, 2023

To: Commission on Water Resource Management

From: David Denecke and Vimla Mathi

Ref: Molokai Water Plan

Dear Commissioners: We are residents of West Molokai, Maunaloa area. I was on the hearing yesterday, but had to leave before you reached on your agenda the Townscape report and public comment. However I feel it very important to make our position known to the Commission.

I, like you, have been a volunteer on many boards and commissions and I now serve on the West Molokai Association Board of Directors. Your Commission will soon be asked to adopt a plan on how Molokai will meet its future water needs. This, to me, should be a clear WIN / WIN public policy decision. All reasonable future water needs can be satisfied from the existing water resources on Molokai.

The water users involved in your decision include from the West end almost 400 condominiums, the Papohaku Beach area homes, Southwest Molokai, The Molokai Ranch, and the areas of Maunaloa, Kipu, and Kualapuu. The need for future adequate allocation of water is a necessity for everyone on Molokai, but is especially needed for these areas. The East half of Molokai is blessed with natural rainfall that meets at least some of its needs. However, especially the West end is in the rain shadow. There is inadequate rainfall to support agriculture and healthy ground cover and tree growth. On top of that there still exists major environmental degradation left over from outdated agricultural and grazing practices, and now from Axis deer. This has left the West end soils at extreme risk. The infrequent rainstorms result in massive erosion, sweeping the soils into the ocean and causing severe damage to corals, marine life and fisheries on the West and Southwest coast lines. Providing ample irrigation water to the West end will foster growth of new plant life, stabilize and rebuild at-risk soil and provide viable livelihoods for all on Molokai.

And then there is the ever present threat of fire. Without healthy agricultural and natural vegetation, the West end is especially vulnerable to fire. As we all painfully now know, many lives and livelihoods are at stake here.

Molokai's West end has much potential from an environmental and agricultural standpoint. In fact most of the land here is zoned for agriculture. My wife and I have found it easy to grow papaya, citrus, mangos, edible greens, tomatoes, and more, all in the native soil. All it takes is a little care...and water.

The days of plans for big resorts and thousands of new homes on the West end are gone and not coming back any time soon. But the need for a greater allocation of water to the West end is even more acute now than ever. The whole ecosystem is left degrading without it. No one should want to withhold that water from the West end when it is available. Providing the water to the West end, and the resulting ag and environmental benefits, will be of benefit to all of Molokai.

Some people who come before you may want the Commission to restrict the water allocation to the West end due to the ownership of the Molokai Ranch utility by 'outsiders'. Please understand that it is the preference of most people on this island that Molokai Ranch not operate the water system much longer. But whether the Ranch does or does not manage the water utility, it is all of the people who depend on that water that matter most.

David Denecke and Vimla Mathi