



DEPARTMENT OF WATER SUPPLY • COUNTY OF HAWAII

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October 27, 2025

Ms. Dawn N.S. Chang, Chairperson and Commissioners
State of Hawai'i
Department of Land and Natural Resources
Commission on Water Resource Management

Re: Agenda Item C.3. – Update Regarding the Development of a First-Generation Keauhou Aquifer System Area Groundwater Adaptive Management Plan, Keauhou Aquifer System Area, Island of Hawai'i

Aloha Chairperson Chang and Members of the Commission,

On behalf of the Department of Water Supply, County of Hawai'i (HDWS), we support the efforts of Deputy Director, Ms. Ciara Kahahane and Commission on Water Resource Management (CWRM) staff to develop an adaptive management plan for the Keauhou aquifer system area. This approach appears to be a pragmatic effort to seek and utilize input and information to establish monitoring procedures to allow for fact-based decision making. As a key stakeholder in this aquifer, HDWS has been, and will continue to, participate and provide input where appropriate. We have attended some of the expert group meetings as observers and found the discussions to be robust and productive.

During the last two meetings of this Commission, mention has been made to consider the designation of the Keauhou Aquifer as a Ground Water Management Area ("GWMA"). As you may recall this Commission took up the designation of the Keauhou Aquifer as a GWMA as recently as 2017. The Commission ultimately did not find sufficient basis to warrant the designation of the Keauhou Aquifer. At that time the highest 12 month moving average (MAV) pumpage was approximately 15.3 million gallons per day (MGD) as of January 2013, which is below 40% of the sustainable yield of 38 MGD. Since then, the highest 12 MAV was approximately 15.0 MGD in November 2016. Most recent 12 MAV, as of July 2025, is approximately 14.1 MG. This shows that pumping has remained flat or slightly declined over the past 12 years. HDWS has concerns that a topic as significant as designation of the Keauhou aquifer as a GWMA, has been discussed without being on the agenda to allow for public input. The nature of this discussion is premature and without basis. We respectfully request that if this matter is considered by the Commission that it be open to further discussion and public input.

HDWS is working to develop two new wells, Wai'aha Well B, and a North Kona Mid-Elevation well, in the Keauhou aquifer. The intent of these two wells is to recover lost capacity when well capacity was reduced during recent repairs, as well as to reduce pumping from HDWS's basal sources. This is aligned with our ongoing strategy to reduce our dependence on basal sources, and move to high-level sources,

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Ms. Dawn N.S. Chang, Chairperson
State of Hawai'i
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as well as explore the viability of the deep confined freshwater source. We are confident that this approach will be beneficial to near shore groundwater dependent ecosystems. We are currently working on Ka Pa'akai efforts for both wells. We are concerned that designation will potentially delay these projects and their associated benefits for many years due to the requirement to process water use permit applications for all existing sources before new source permits are processed.

We know that HDWS has been criticized for not completing the process to finalize the 2017 Keauhou Water Use and Development Plan (WUDP) update. HDWS is currently in the process of commencing a new WUDP for the Keauhou aquifer which will integrate updated hydrological data, demand projections, land use and traditional and customary considerations, which is expected to be aligned with CWRM's anticipated updates to the Hawai'i Water Plan framework.

DWS reaffirms its commitment to responsible, science-based, and culturally respectful water management and hopes this Commission will do the same.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Okamoto', with a stylized flourish at the end.

Keith K. Okamoto, P.E.
Manager-Chief Engineer

KKQ:klcm

copy: C. Kimo Alameda, Mayor, County of Hawai'i
Water Board, County of Hawai'i



27 October 2025

Ms. Dawn N.S. Chang, Chairperson
and Commissioners
Commission on Water Resource Management
Department of Land and Natural Resources
State of Hawaii
1151 Punchbowl Street, Room 227
Honolulu, HI 96813

Re: Agenda Item C.3. – Update Regarding the Development of a First-Generation Keauhou Aquifer System Area
Groundwater Adaptive Management Plan, Keauhou Aquifer System Area, Island of Hawai`i

Aloha Chair Chang and Commissioners,

This testimony is submitted on behalf of the Hawai`i Island Economic Development Board (HIEDB), a private member-based 501(c)3 incorporated in 1984, whose members are committed to providing and promoting private sector support and expertise for balanced growth in Hawai`i County in partnership with Federal, State, County, and private resources.

HIEDB supports the efforts of Deputy Director Ciara Kahahane and Commission on Water Resource Management (CWRM) staff to develop an adaptive management plan for the Keauhou Aquifer System area.

HIEDB also supports the efforts of the County of Hawaii Department of Water Supply (HDWS) to develop two new wells, Wai`aha Well B, and a North Kona Mid-Elevation Well, located in the Keauhou Aquifer, in alignment with HDWS's strategy to move to high-level sources, thereby reducing dependence on basal sources.

HIEDB does not support the designation of the Keauhou Aquifer as a Groundwater Management Area (GWMA), which HIEDB has opposed as recently as 2017, when an insufficient basis for such designation was determined, including through independent studies commissioned by HIEDB. Discussions at recent CWRM meetings suggesting designation are disconcerting, and HIEDB strongly requests that any future discussions regarding designation be transparent and agendized with opportunity for public input.

Sincerely,

Jacqui L. Hoover
Executive Director and COO
Email: jhoover@hiedb.org

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Mail: 67-1185 Mamalahoa Hwy, Unit D104 #353, Kamuela, HI 96743



HAWAII LEEWARD PLANNING CONFERENCE

27 October 2025

Ms. Dawn N.S. Chang, Chairperson
and Commissioners
Commission on Water Resource Management
Department of Land and Natural Resources
State of Hawaii
1151 Punchbowl Street, Room 227
Honolulu, HI 96813

Re: Agenda Item C.3. – Update Regarding the Development of a
First-Generation Keauhou Aquifer System Area Groundwater
Adaptive Management Plan, Keauhou Aquifer System Area,
Island of Hawai'i

Aloha Chair Chang and Commissioners,

This testimony is submitted on behalf of the Hawaii Leeward Planning Conference (HLPC), a private member-based 501(c)3 incorporated in 1974, when forward-looking business and community leaders saw the need for an organization that would work with government to promote sound planning decisions for West Hawai'i. In the intervening years, in recognition of changes to socioeconomics, communities, communications, technology, and policy making, HLPC has maintained its original name while broadening its scope to all of Hawai'i Island. HLPC is dedicated to working with government agencies and private sector entities to assist in making decisions and to alert and inform its members and the public on issues relating to Hawai'i Island and their interests. HLPC initiatives include and are not limited to agriculture, land use and planning, infrastructure, and housing.

HIEDB supports the efforts of Deputy Director Ciara Kahahane and Commission on Water Resource Management (CWRM) staff to develop an adaptive management plan for the Keauhou Aquifer System area.

HLPC is the founder and convenor of the Hawaii Water Roundtable (including Waimea and Kona Water Roundtables), which convenes to consider water resources, including management and development. At the Hawaii Water Roundtable convened in June 2023 with information from multiple water resource consultants and hydrologists, it was reiterated that there is no basis for the Keauhou Aquifer as a Groundwater Management Area (GWMA). This is consistent with HLPC's prior opposition to such designation, absent scientifically based data supporting the need for a GWMA. Recent mention of such a designation is not founded in science, and HLPC opposes any further mention of designation of the Keauhou Aquifer unless such discussion is placed on the agenda and open to the public for discussion.

Sincerely,

FIRST HAWAIIAN BANK, Charter Member
KAMEHAMEHA SCHOOLS, Charter Member
LANIHAU PROPERTIES, LLC, Charter Member
QUEEN EMMA LAND COMPANY, Charter Member
THE LILI'UOKALANI TRUST, Charter Member
BANK OF HAWAII, 1975
MAUNA KEA RESORT, 1980
R.M. TOWILL CORPORATION, 1983
WEST HAWAII CONCRETE, 1983
HAWAII ELECTRIC LIGHT COMPANY, INC., 1988
PARKER RANCH, INC., 1988
PONOHOLO RANCH LIMITED, 1992
HUALALAI RESORT, 1994
AKINAKA & ASSOCIATES, LTD., 1997
CADES SCHUTTE, LLP, 1997
GREENWELL FARMS, INC., 1999
KAI HAWAII, INC., 2000
KOHALA RANCH DEVELOPMENT CORP., 2000
KTA SUPER STORES, 2000
HPM BUILDING SUPPLY, 2001
SAM O. HIROTA, INC., 2001
BELT COLLINS HAWAII, 2003
PACIFIC RESOURCE PARTNERSHIP, 2003
PBR HAWAII & ASSOCIATES, INC., 2003
TITLE GUARANTY ESCROW SERVICES, 2003
WILSON OKAMOTO CORPORATION, 2003
DAVID S. DE LUZ, SR., ENTERPRISES, INC., 2004
NORTH HAWAII COMMUNITY HOSPITAL, INC., 2007
W.H. SHIPMAN, LTD., 2007
FERRARO CHOI AND ASSOCIATES, LTD., 2008
HAWAII WATER SERVICE CO., 2009
HUNT DEVELOPMENT GROUP, 2009
PUNA GEOTHERMAL VENTURE, 2009
TINGUELY DEVELOPMENT, INC., 2009
HAWAII GAS, 2010
ENGINEERING PARTNERS, INC., 2011
RIDER LEVETT BUCKNALL, LTD., 2011
FLEMING & ASSOCIATES, LLC, 2012
KOHANA'IKI SHORES, LLC, 2012
SETTLE MEYER LAW, 2012
SSFM INTERNATIONAL, INC., 2012
YAMAMOTO CALIBOSO HETHERINGTON, LLC, 2012
HILTON WORLDWIDE, 2013
CARLSMITH BALL, LLP, 2014
EDWIN DE LUZ TRUCKING & GRAVEL, LLC, 2014
W.M. KECK OBSERVATORY, 2014
GOODFELLOW BROS., INC., 2015
HOEISF, 2015
MCCULLY WORKS, 2015
ARMSTRONG BUILDERS, LLC, 2016
HAWAII CONSTRUCTION ALLIANCE, 2016
HHF PLANNERS, 2016
IOKUA RESIDENTIAL SERVICES, INC., 2017
MUNEKIYO HIRAGA, 2017
AWA KELE, LLC, 2018
KENNEDY WILSON, 2018
ALI'I BUILDERS, LLC, 2019
IBEW LOCAL UNION 1186, 2019
MERIDIAN PACIFIC, LTD., 2019
NORDIC PCL CONSTRUCTION, INC., 2019
HAWAII COMMUNITY FCU, 2020
WAIKOLOA LAND COMPANY, 2020
G70, 2021
HAWAII LECET, 2021
SHIZEN CONSULTING MANAGEMENT, LLC, 2022
STARN O'TOOLE MARCUS & FISHER, 2022
AES CLEAN ENERGY, 2022
MANINI HOLDINGS, 2022
MAUKA TO MAKAI GENERAL CONTRACTING, 2022
MOSS AND ASSOCIATES, 2023
WEST HAWAII ASSOCIATION OF REALTORS, 2023
CANADA FRANCE HAWAII TELESCOPE, 2024
CU HAWAII FCU, 2025
LUVIA REAL ESTATE, 2025
NAN, INC. 2025

Jacquie L. Hoover
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