

CLIMATE CHANGE COMMISSION
CITY AND COUNTY OF HONOLULU

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January 23, 2022

The Honorable Tommy Waters
Chair and Presiding Officer and Members
Honolulu City Council
530 South King Street, Room 202
Honolulu, Hawai'i 96813

Dear Chair Waters and Councilmembers:

SUBJECT: Bill 48 (2021), CD 1 – Relating to Underground Storage Tanks

The City and County of Honolulu's ("City") Climate Change Commission ("Commission") strongly supports Bill 48 (2021), CD 1, which requires any entity who operates an underground storage tank or tank system greater than 100,000 gallons of any substance to obtain a permit from the City. As the Commission, we emphasize how this bill will help protect the purity of O'ahu's groundwater, a fundamental need for our communities now and in the future. The provisions in Bill 48 encourages increased oversight of any underground storage tanks located on O'ahu by the City including access to storage facilities for the purpose of inspection and monitoring to ensure there is no imminent or substantial risk to human health or the environment. Bill 48 aligns with several other plans and policies, including the City's O'ahu Resilience Strategy, the Honolulu Board of Water Supply's ("BWS") 2016 Water Master Plan, 2009 Ko'olau Loa Watershed Management Plan, 2009 Wai'anae Watershed Management Plan, 2012 Ko'olau Poko Watershed Management Plan, 2016 North Shore Watershed Management Plan, 2017 'Ewa Watershed Management Plan, and the Climate Change Vulnerability Assessment for Water Supply & Water Systems Report, and the State's Commission on Water Resource Management's stance on Red Hill.¹ Bill 48 can thus be considered one of O'ahu's climate mitigation strategies.

As O'ahu's population grows, so too does the demand for freshwater. These demands are further amplified in the face of decreasing rainfall and increased evaporation and evapotranspiration due to climate change (Timm et al, 2013; Keener et al., 2018), which result in decreased recharge of our aquifers. Given severe drought conditions across the state since 2008, any reduction in potable supply decreases O'ahu's freshwater resilience (Frazier and Giambelluca, 2017). Bill 48 provides a mechanism for the City, which currently regulates drinking water for the island of O'ahu, to regulate operations of large underground tank systems. The Commission supports measures such as those in Bill 48 that require reporting of any changes in operations to large storage tank facilities that may compromise the environment and the aquifers from which we draw our drinking water. The U.S. Environmental Protection Agency (USEPA) has designated the Southern O'ahu Basal Aquifer, which spans East Honolulu to Central O'ahu as a sole source aquifer for the O'ahu making the need for vigilance in protecting these vital resources. Per the Commission's Climate Change Brief (June 2018), it is important that the City have the authority to revoke the ability of any entity which

¹ <https://dlnr.hawaii.gov/blog/2022/01/10/nr22-002/>

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threatens our drinking water supply.

Unfortunately, in addition to threatening water recharge, climate change has already increased the frequency and intensity of natural disasters (IPCC, 2021), likely leading to loss of power. All of the BWS's 184 pump stations and well sites and 12 granular activated carbon treatment facilities require power. Emergency disaster plans require the full functioning of gravity flow facilities such as the Hālawā Shaft, which provides 25% of the island's water, to supply water in these scenarios (BWS, 2016). However, due to fuel contamination from the U.S. Navy Red Hill Fuel Storage Facility and lack of accurate hydrological modeling of the fuel plume, the Hālawā Shaft is currently offline. **Protecting these aquifer sources from pollution is a critical climate defense**, affirmed BWS Manager and Chief Engineer Ernie Lau. Bill 48 moves a step further by allowing the City to act in cases of release from large-scale storage systems and articulates a requirement for monitoring, reporting and revocation of activities.

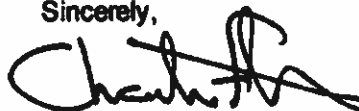
Notably, in response to the January 2014 fuel release from the facility, the USEPA, and Hawai'i Department of Health ("DOH") negotiated an enforceable agreement, known as the Administrative Order of Consent ("AOC")² with the U.S. Navy and the Defense Logistics Agency. The absence of the BWS as a signatory agency in this agreement is a major gap in this policy as the residents of O'ahu are directly impacted by pollution of Red Hill. Bill 48 introduces a mechanism for the City to have direct regulation over large-scale storage systems such as the Red Hill Fuel Storage Facility.

In conclusion, the City and County of Honolulu Climate Change Commission thanks Chair Waters and Council members for proposing Bill 48 and stands with you in supporting the natural waters of O'ahu as a critical resource. We also recognize that the City Council has a strong track record of calling for accountability of the U.S. Navy. We especially want to recognize and extend our appreciation to the Honolulu Board of Water Supply for their compelling and effective efforts in protecting our water supplies and for holding the U.S. Navy responsible for their actions in this regard.

Thank you for the opportunity to submit comments in Support of Bill 48 (2021), CD 1. The Climate Change Commission urges you to support passage of the bill.

Should you have any questions, please feel free to contact the Climate Change Commission via email at ccc@honolulu.gov.

Sincerely,



Charles Fletcher, PH.D., Chair
Climate Change Commission

² <https://www.epa.gov/red-hill/red-hill-administrative-order-consent>

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