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April 8, 2021

Chairperson and Members
Board of Land and Natural Resources
State of Hawaii
Honolulu, Hawaii

Dear Chair Case and Board Members

SUBJECT: Staff Report Regarding Dam Safety Enforcement Action on Wahiawa Dam (OA-0017) for Failure to Comply with Notice of Deficiency, Issued February 18, 2020

My name is Hirokazu Toiya and I'm the director of the Department of Emergency Management (DEM), City and County of Honolulu. I would like to offer comments regarding the Department of Land and Natural Resources Staff Report dated April 9, 2021 on "Dam Safety Enforcement Action on Wahiawa Dam (OA-0017) for Failure to Comply with Notice of Deficiency, Issued February 18, 2020.

As noted in the Staff Report, failure of the Wahiawa Dam may result in the loss of human life as well as significant damage to property in Waialua and Haleiwa area. As the emergency management agency, we are tasked with preparing for and responding to disasters and we work with stakeholders to develop emergency response plans, which in this instance would be for the evacuation of the areas that may be inundated should the dam fail. Like in medicine, an ounce of prevention is worth a pound of cure in emergency management.

Over the years, DEM has had a collaborative relationship with staff from the Dam Safety Program but also with representatives from the Dole Food Company. We have had open communication in emergency preparedness and response for flood hazards associated with Wahiawa Dam. That being said, the potential hazard associated with Wahiawa Dam is substantial and is of great concern to not only to DEM and the City but the communities downstream. Every effort should be taken to mitigate risk as soon as possible to save lives and property, particularly when there are known deficiencies that

have not yet been addressed. We will do as much as we can to prepare emergency response but the far better outcome is that we don't need to respond to emergencies associated with the Wahiawa Dam or that at least the likelihood of a need for emergency response is substantially reduced. In larger scale weather events such as hurricanes in which we have multiple hazards across the island to contend with, our ability to concurrently address an emergency associated with Wahiawa Dam and other impacts may be limited. Furthermore, our emergency response action in any scenario may be able to reduce the loss of life but not the loss of property.

We sincerely hope that Dole Food Company Hawaii and Sustainable Hawaii, Inc. are able to quickly address the deficiencies identified in the Staff Report. In the meantime, we appreciate their willingness of to continue to work with us to do as much as we can collectively do to protect our communities.

Sincerely,

Hirokazu Toiya
Director of Emergency Management
City and County of Honolulu