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**Testimony of Malia Akutagawa and Harmonee Williams
Before the Maui County Council Planning Committee
Re: Moloka'i Community Plan Update
Thursday, July 5, 2018 - Maui County Council Chamber**

Aloha Chair King and Members of the Maui County Council Planning Committee:

Mahalo for inviting us to serve as resource people as you deliberate over the draft updated Moloka'i Community Plan.

Background Information and Comments on Planning Director William Spence's correspondence, dated June 1, 2018

As you know, we have taken responsibility for assisting the East and West End communities on Moloka'i to prepare their policy statements as well as integrate them into chapters. Harmonee is an environmental and community planner and dedicated many volunteer hours of listening to these communities and crafting their updated policy statement. **In 2008, she also assisted the East End Community and the County Planning Department in preparing the Mana'e GIS Report which entailed the identification and GIS mapping of cultural sites and traditional cultural landscapes which the people earmarked for the protection under a proposed new zoning designation called "Traditional Land Use (TLU) Overlay."**

Malia has extensive experience in understanding county regulations and the land use permitting process through having served on the Moloka'i Planning Commission as Chair for five years. She is also an Assistant Professor of Law and Hawaiian Studies and utilized her Hawaiian Rights Clinic to assist in developing a community toolkit of legal resources to explain the permissible uses under each county land use designation, water resources issues that should inform the community planning process, Native Hawaiian rights protections, due process rights, and the Community Based Subsistence Fishing Area law. This community toolkit was utilized to assist in moku (district) meetings facilitated by the 'Aha Kiole o Moloka'i in 2016. The 'Aha Kiole o Moloka'i received concerns from residents who felt their due process rights were being adversely affected by tactics employed by the Planning Department to limit time for public testimony and for failing to make critical information available, such as current Moloka'i zoning maps and updated zoning maps based on the Community Plan Advisory Committee's (CPAC) deliberations.

RECEIVED AT PC MEETING ON 7/5/18

One of the major obstacles that our community had encountered early on during the CPAC process was the threat of elimination of the East End Policy Statement that had been crafted in the 1980s and made part of the first and subsequent community plans. This document is beloved and considered necessary by the Mana'e (East End) community and represented the empowerment of its people who had bitterly fought against the dredging of reefs and resort development in Mana'e. From this East End Policy Statement, the Mana'e community made clear that this area was a pu'uhonua for the entire island and should not be slated for hotel, urban, and commercial development. **The Maui Planning Department strongly recommended to the CPAC to eliminate the East End Policy Statement because it did not conform to their new planning template. It appeared that the Planning Department was more concerned about "form" rather than "substance" and in that approach was okay with causing adverse harm to the Mana'e community and disregarding the conscientious work of its citizens, including kupuna (elders) who have since passed away. This alarmed the Mana'e community and they began to organize to ensure that the East End Policy Statement be reinstated as well as updated and strengthened to reflect any changes that have occurred over the last 40 years. We were enlisted to ensure this work would be completed and to advocate on behalf of Mana'e before the Moloka'i Planning Commission to ensure the updated East End Policy Statement would be included in the Community Plan.**

Once the draft Moloka'i Community Plan was handed off from the CPAC to the Moloka'i Planning Commission, the proceedings under the leadership of former Planning Commission Chair, Zhantell Dudoit-Lindo, were more favorable in receiving meaningful public testimony. Fortunately, we were successful in having our strengthened East End Policy Statement approved by the Planning Commission. **We introduced the Traditional Land Use Overlay designation, which came forth from the Mana'e GIS Report, and as a direct recommendation from the Planning Department in 2008 under the former leadership of director Wayne Boteilho. We asked that the GIS maps created by the Mana'e community, as well as certain archaeological reports, be incorporated into the community plan to be covered under the TLU Overlay. The planning commission thought this recommendation made so much sense, that they asked us to amend our request to include TLU Overlay coverage for the whole island, not just Mana'e. In this way, other districts of Moloka'i could incorporate the TLU Overlay. The West End community also developed a West End Policy Statement and incorporated the work of an estimated 1,000 people who were part of the Molokai Ranch Master Land Use Planning process in identifying important cultural sites and landscapes for protection. The West End Policy Statement was revised to include those sites under the TLU Overlay.**

Planning Director William Spence is vehemently opposed to the TLU Overlay and publicly stated before the Molokai Planning Commission that if approved, he would not implement, nor enforce it. We find this puzzling, especially since it was the Planning Department who partnered with the East End Community to draft the Mana'e GIS Report and who advocated for the TLU Overlay and its inclusion in the next Moloka'i Community Plan Update. Furthermore, most of the hard work was already completed with the community GIS'ing numerous important cultural sites and landscapes. All that would be required is to have the TLU overlay maps reflecting this information and the Planning Department in generating staff reports and recommendations to the Planning Commission on future land use permit applications to notify the Planning Commission of a TLU Overlay. In this manner, the Planning Commission could then impose certain conditions upon permit approval in order to protect these sites. Mr. Spence continues to stonewall our community as can be seen in his recent letter dated June 1, 2018. Mr. Spence proposed that your committee to supplant the Moloka'i's community plan zoning designations under Appendices 6.1 and 6.2 with the Lāna'i Community Plan's Appendix 9.2. This would effectively remove our community efforts to include the TLU Overlay. There may also be additional repercussions that we don't yet perceive, but would likely reveal themselves as the Moloka'i Planning Commission reviews permit applications and rely on Lāna'i's version rather than our own which we have carefully crafted and vetted to meet the unique needs of our own island. For this reason, we urge your committee to keep Appendices 6.1 and 6.2 within our Community Plan and not replace it with the Lāna'i's Appendix 9.2.

We would like to note that as you review the Planning Department's letter dated June 1, 2018 that you keep in mind that, as a community, we have noticed throughout the entire planning process, the Planning Department misrepresents events and continuously tries to sabotage our community plan. This has prompted our community to be extra vigilant throughout this process, to testify before the Molokai Planning Commission, and now before your committee. **One of the egregious harms that Mr. Spence attempted to commit at the last Moloka'i Planning Commission Meeting on the Community Plan was to obstruct West End residents in the introduction and approval of their West End Policy Statement. In the guise of caring for the community and wanting them to have a perfect version of their West End Policy Statement, he encouraged them to not submit their policy statement to the Planning Commission. This was on the last day of deliberation before the Planning Commission before handing off the community plan to your committee. Mr. Spence failed to inform the West End residents that they would have time to make revisions during the County Council Planning Committee Review. Rather, he obfuscated the truth by making them think it was**

better to submit a perfect version than to submit a less than perfect one. He failed to tell them that if they did not introduce their policy statement this round, it would be completely left out of the Community Plan and any revisions to their policy statement would have to take place a decade or more later when the next Moloka'i Community Plan Update process would be scheduled.

Mr. Spence's references to redundancies in the community plan are also a slight of hand. The so-called "redundancies" are merely statements that reflect back and reaffirm certain provisions present in the updated community plan. They reflect consistencies throughout the document rather than "redundancies." To remove those statements would render the plan confusing and less intelligible. Perhaps that is the intent of the Planning Department in order to exercise undue influence on the Planning Commission. If the community plan is unclear, then it is easier for the Planning Department to impose its own recommendations outside of the will and intent of the Moloka'i community.

We are sharing this information leading up to your proceedings to give you the contextual backdrop for which our community has taken the planning process very seriously and have been involved proactively to ensure that our voices and our spirit is embedded in this updated Moloka'i Community Plan. We are well aware that the community planning process is the first line of defense in protecting our important natural and cultural resources and our rural, traditional subsistence lifestyle. Thus, we ask that you support the work we have done and ask you not to substantively change the essence of what we have tried to accomplish in this community plan review process.

The East End and West End Policy Statements Should Be Adopted as Chapters Rather than be Erased or Placed in the Appendices Section.

The Planning Department opposes Chapters 10 and 11 which cover the East End and West End Policy Statements. The Planning Department's claim that the East End and West End Policy Statements were last minute inclusions in the community plan is false. We have consulted with several members of the CPAC and have been informed that the CPAC voted to keep the East End Policy Statement at the very least as an appendix. This was not to confine the East End Policy Statement to the appendix, but to make sure it was included, knowing that CPAC members and the general public would still be able to provide mana'o on it while the Molokai Planning Commission and Council reviewed it. After the Community Plan was submitted to the County Council Planning Committee, they agreed to include these Policy Statements as Chapters, but thought it was important to reformat both the East End and West End Policy Statements to follow the format of the other Chapters. We took it upon ourselves to

Testimony of Malia Akutagawa and Harmonee Williams on Moloka'i Community Plan Update
Before the Maui County Council Planning Committee
July 5, 2018

undertake the work of reformatting, to ensure this mana’o was included as such. Furthermore, as we stated above, the Planning Department was doing all that it could to block the West End community from introducing their policy statement.

The East End Policy Statement has been part of all our past community plans since the first plan in 1981. It therefore should remain part of our updated community plan. The West End should equally be self-determined as a unique community with its own set of challenges and opportunities. Moloka’i Ranch currently owns one-third of our island, particularly the West End. As it seeks to sell off its properties, the West End community is placed in an uncertain future. Already, they are suffering from water quality issues, high unemployment, their subsistence hunting grounds threatened by wildlife game tourism and commercial trophy hunting, and increased rental rates of so-called low-moderate income housing. When a new landowner purchases Moloka’i Ranch’s landholdings, it will be important that any of its future plans be congruent with the community’s vision, as identified in the West End Policy Statement.

At the leadership and urging of Council Member Stacy Crivello, Moloka’i’s resident member, as well as Committee Chair Kelly King, we were asked to reformat the East End and West End Policy Statements into chapters. The rationale for this was to ensure that action steps would be prioritized and implemented. Planning Director William Spence argued that these policy statements were too voluminous, duplicative, challenging to implement, and that the presence of these chapters would cause the overall community plan to lose its effectiveness and credibility. We respectfully disagree. We assert that the level of detail reflects the will and intent of the community and should not be dismissed to meet some kind of arbitrary preference for page limits. Furthermore, these policy statements will greatly aid the Moloka’i Planning Commission to make informed decisions that protect our island’s environment, rural character, cultural values, and subsistence economy.

Recommend Reinstatement of Specific Language that was Deleted from Chapter 10 East End Policy Statement and then Formally Adopt and Approve

We were asked to reformat both the East End and West End Policy Statements into Chapters. We are troubled to see the removal of some key provisions from the chapters we wrote. Specifically, for the East End Policy Statement, the removal of Action No. 10.1.03 which calls for the “support [of] designations to protect and preserve traditional lands under the DLNR conservation regulations, through County zoning, or other appropriate methods, including the creation of a Traditional Land Use Overlay.” We have already explained the importance of the TLU Overlay in other sections of our testimony. This is one of the major additions to our

community plan which underscores the uniqueness of our island community in our desire to preserve our traditional and cultural landscapes.

In Table 10.2 on Cultural Resources and Traditional Land Uses there are a number of action items that have been removed by your committee. These provisions include protecting Ulu Kukui o Lanikaula and the cave of Hina, the mother goddess of Moloka'i. These provisions reflect the wishes of our mākuā and kūpuna as early as the 1980s. Some of them have already passed away. They fought very hard to keep Mana'e Mana'e. To remove these action items is to disrespect their voices and original intent. We respectfully request that these provisions be restored or at minimum described in a narrative portion of the East End Policy Statement if the County Council deems them to be of "low priority." In this way, community intent will be preserved and the Moloka'i Planning Commission will be able to reference these portions of the plan whenever a proposed land use permit might affect these traditional lands.

Recommend Reinstatement of Appendices that were Deleted from the May 2018 Version of the Moloka'i Community Plan that were referenced in the East End Policy Statement

We noticed that your committee has deleted a number of appendices that were originally referenced by our East End Policy Statement. These documents include:

- Traditional and Customary Practices Report for Mana'e, Moloka'i (February 2016)**
- A Framework for the 'Aha Moku System and Collaborative Governance**
- United Nations Declaration on the Rights of Indigenous Peoples**
- Advisory Council on Historic Preservation - Section 106 and the U.N. Declaration on the Rights of Indigenous Peoples: Intersections and Common Issues: Article 18 and Section 106**
- Mana'e GIS Mapping Project (May 2008)**
- Table 5.1: Mana'e Subsistence & Ahupua'a Management Plan Framework & Table 5.3: Community Suggestions for East Slope Management Plan**
- University of Hawai'i Archaeological Training Project, Kamalō, Moloka'i, Hawai'i (December 2005)**

We respectfully request that you restore these documents to the Appendices section of the community plan. Two of these documents reference ahupua'a, watershed management, and erosion control measures; they will aide the Moloka'i Planning Commission in understanding the community's intentions in this section of the East End Policy Statement.

Testimony of Malia Akutagawa and Harmonee Williams on Moloka'i Community Plan Update
Before the Maui County Council Planning Committee
July 5, 2018

Several of the documents also map and identify areas that are recommended for protection under the Traditional Land Use Overlay. These are important for the Moloka'i Planning Commission to be aware of when making land use decisions that might affect cultural sites and landscapes. Information provided on collaborative governance, consultation processes like Free, Prior, and Informed Consent (FPIC) guaranteed by the UN Declaration on the Rights of Indigenous Peoples and adopted by our federal government are also important as they apply to our cultural sites and traditional cultural landscapes.

Recommendations for Chapter 12 - Implementation and Monitoring. Support Prioritization and Reinstatement of CPAC #2 Priorities

At the June 15, 2017 meeting, members in the Molokai community testified in support of prioritizing the action items in Chapter 12 from only priorities 1 and 2, to one that would better instruct the County the order in which to address each action item. There were over 200 action items, the CPAC was only allowed to choose priority 1 or 2, which only narrowed it down by half. With over 100 action items, the County could potentially start on programs and projects that are not as important to the community. Prioritizing it further makes it possible for the community to communicate to the County what they would like to see funded and completed in the first 1-3 years, and the next, 1-3 years. It makes it a plan that is more transparent in its implementation process.

The Planning Department claims that 40% of the CPAC's action items were deleted. That is inaccurate. The action items are still in the plan, but some have been moved from the Action Table, to the Policy section. The Planning Department also claims that the CPAC was given numerous hours, and that their prioritization process was detailed and extensive. CPAC members who have continued to follow this process have said from the first informal talk story that Chair King held on Molokai that this is not true. They said that they felt rushed, that they were not given enough time to choose between 1 and 2, and that a 1 or 2 is not enough to truly inform the County of Molokai's priorities. All of the informal talk stories on Molokai were recorded by Akaku and are available for public review.

We thank Chair King for listening to our community and following through on a prioritization process that was fair and transparent. The methodology Chair King used ensured that community members would not be able to vote on his/her priorities more than once. This process took months to complete and was supported by Council Member Crivello, who conducted four of her own informal talk stories in each district on Molokai. Community

Testimony of Malia Akutagawa and Harmonie Williams on Moloka'i Community Plan Update
Before the Maui County Council Planning Committee
July 5, 2018

members even took it upon themselves to hold their own meetings to discuss prioritizing the action items. What resulted from all this effort was something that came from the community, a plan that would be easier to implement.

We respectfully request that the items which received a Priority 2 by the CPAC be reinserted into the Plan. It is important to keep in all the action items that still need to be implemented, so that it is on record as something needing to be addressed.

We also request that the following sentence be included on the first page of Chapter 12, "Maui County Code 2.80B.110 enables a person to amend the community plan after 5 years of enactment."

Recommend Restoration of References to the Traditional Land Use (TLU) Overlay throughout the Updated Moloka'i Community Plan. Recommend Inclusion the TLU Overlay In Appendix 6.1 and Appendix 6.2 and then Approval and Adoption of these Appendices as Amended

We have noticed that your committee has deleted references to Traditional Land Use (TLU) Overlay within the Moloka'i Community Plan within the East End Policy Statement and on page 86 of Chapter 6. We recommend that you restore the TLU language wherever it has been deleted. We also recommend that the TLU Overlay be described in Appendix 6.1 and Appendix 6.2.

Many cultural sites have been lost to data recovery because archaeological inventory reports have analyzed sites in a fragmented way that lacks appreciation for the contextual backdrop for which these sites exist. This is why the federal government is moving towards looking at sites in their totality, as part of traditional cultural landscapes (TCLs) or traditional cultural properties (TCPs). Much evidence of our history is evidenced in these TCLs and TCPs. For this reason, it is important that the county begin to recognize the efforts of our federal government to give greater protection to them. A positive step in that direction is to formally adopt a TLU overlay. We believe your committee should take note that the county Planning Department in 2008 thought it important to move in this direction by funding the Mana'e GIS project with a \$10,000 grant and recommending the TLU overlay. To now have our current Planning Director state that this is untenable seems to indicate that this statement is not rationally motivated, but perhaps politically motivated and serving of commercial development interests rather than the will of the Moloka'i community.

We also disagree with the Planning Department's recommendation to supplant Appendices 6.1 and 6.2 with the Lāna'i Community Plan Appendix 9.2 which would have the effect of undoing the work of our community to address the unique issues of our island. We have heard that Planning Director William Spence has claimed that the Moloka'i Planning Commission had deferred to the Planning Department on this matter of determining county land use zoning designations for Moloka'i. There are no planning commission minutes that reflect this statement. Furthermore, we consulted with several community members to see if Mr. Spence's claim was accurate. We found out that former Planning Commission Chair Zhantell Dudoit-Lindo refutes Mr. Spence's statement.

Some of the CPAC members we consulted with also communicated their concern about utilizing the Lāna'i Community Plan Appendix 9.2. They informed us that the Planning Department deliberately gave false and misleading information about county zoning designations and failed to produce maps from the previous community plan to reference during the community plan update process. The Planning Department also misled the CPAC in stating that those county zoning designations were not regulatory and enforceable. Having served on the Moloka'i Planning Commission, I, Malia Akutagawa, have had direct experience in knowing that the county land use zoning designations are paramount to making decisions on permit applications. The Planning Commission must be able to know if the proposed use in a permit application is compatible with the zoning designation.

Recommend Maintenance of References to Community Based Subsistence Fishing Area for Mo'omomi and North Coast of Moloka'i with Minor Amendments to Text

We disagree with the Planning Department's recommendation to remove language about the Community Based Subsistence Fishing Area (CBSFA) for Mo'omomi North Shore of Moloka'i. This represents 25 years of dedication with numerous community volunteers to maintain and enhance important fishery resources in order that traditional subsistence practices may persist for generations to come.

The CBSFA law was passed by the Hawai'i State legislature in 1994. This legislation came from an initiative by former Governor Waihe'e who authorized a task force to document the importance of subsistence practices on the island of Moloka'i. The Governor's Moloka'i Subsistence Task Force Final Report found that subsistence serves as a vital and sustainable sector of Moloka'i's economy. With high unemployment and public assistance rates, "[t]he ability to supplement meager incomes through subsistence is very important to maintaining the quality of life of families on the island." (Jon Matsuoka, Davianna McGregor, Luciano Minerbi, &

Testimony of Malia Akutagawa and Harmonee Williams on Moloka'i Community Plan Update
Before the Maui County Council Planning Committee
July 5, 2018

Malia Akutagawa, Governor's Molokai Subsistence Task Force Report (1994)) Through extensive community surveys and focus groups, the task force identified problems that were making it harder for the community to engage in subsistence fishing, hunting, and gathering practices. Overharvesting, the use of improper harvesting methods, and the degradation of subsistence values, customs, methods, and practices were found to be the critical threats to subsistence fishing practices. The fishery along the northwestern coast of Moloka'i experienced a rapid decline and near collapse of its kumu (white saddle goatfish, *Parupeneus porphyreus*) and ula (spiny lobster, *Panulirus marginatus*) populations. The Hawaiian homesteaders of Ho'olehua rely on this fishery for subsistence.

The task force findings led the legislature to adopt Act 271, codified as Hawai'i Revised Statutes, Section 188-22.6, which imposes special protections on fisheries statewide that "reaffirm[] and protect[] fishing practices customarily and traditionally exercised for purposes of Hawaiian subsistence, culture, and religion." The Governor's task force also successfully advocated on behalf of the homesteaders to designate Mo'omomi as a demonstration site that would eventually become a permanent CBSFA.

Hui Mālama o Mo'omomi has been leading the effort to permanently establish the CBSFA. Hui Mālama utilizes a Hawaiian, indigenous methodology to study and monitor resources. These methods and their successes in restoring fishery health are well-documented in several peer-reviewed scientific journals. (KELSON K. POEPOE, PAUL K. BARTRAM, AND ALAN M. FRIEDLANDER, The Use of Traditional Hawaiian Knowledge in the Contemporary Management of Marine Resources, in FISHER'S KNOWLEDGE IN FISHERIES SCIENCE AND MANAGEMENT 119 (Nigel Haggan, Barbara Neis and Ian G. Baird, eds. 2007); A. Friedlander, K. Poepoe, K. Poepoe, K. Helm, P. Bartram, J. Maragos and I. Abbott, Application of Hawaiian traditions to community-based fishery management, in Proceedings 9th Int'l Reef Symp., Bali, Indonesia 813 (2000))

Strong community involvement consists of renewing cultural protocols and traditional, communal codes of conduct to conserve and respect the resources; teaching Hawaiian youth traditional practices in marine conservation; and monitoring marine biological processes such as fish spawning, aggregation, and feeding behavior along corresponding moon phases and cycles and through the use of Hawaiian scientific mental modeling or temporal framing of ecosystem dynamics. This "[c]ommunity-based management is thought to be useful in overcoming what is seen as the distant, impersonal, insensitive and bureaucratic approach now characterizing the role of government in fisheries management." (A. Friedlander, K. Poepoe, K.

Testimony of Malia Akutagawa and Harmonie Williams on Moloka'i Community Plan Update
Before the Maui County Council Planning Committee
July 5, 2018

Poepoe, K. Helm, P. Bartram, J. Maragos and I. Abbott, Application of Hawaiian traditions to community-based fishery management, in Proceedings 9th Int'l Reef Symp., Bali, Indonesia 813 (2000))

We oppose the Department's recommendation to remove references to the Mo'omomi North Coast of Moloka'i CBSFA management plan and proposal. While the rulemaking process continues, the management plan still reflects solid data collected over 25 years on fishery health in the area.

At the last meeting Maui County Council Planning Committee in June 2018, there were some naysayers testifying in opposition to the CBSFA who claimed they were not invited to the numerous community meetings. This is false. They were invited. They gave input. They represent a minority, albeit loud, voice. These individuals who reside in the Ho'olehua area as homesteaders also testified to remove any mention of CBSFA designation in our East End and West End Policy Statements. That is overstepping, particularly because they are not from those communities. The East End and West End communities have a right to seek measures to protect their fisheries. Furthermore, there are 19 other communities throughout Hawai'i who are seeking CBSFA designation. Their success hinges on the success of Mo'omomi.

Recommend Maintenance of Subsistence Economy Language in Chapter 5

We have heard that some of your committee members are encouraging the removal of language referencing Moloka'i's Subsistence Economy in Chapter 5 on Economic Development. We ask that this language not be removed as it accurately reflects information provided in the 1993 Moloka'i Subsistence Study which found that a significant percentage (28%) of the average Moloka'i family's diet comes from subsistence foods (what families grow on their own, catch, harvest, and gather). The study underscores the strong dependency Moloka'i's people have on the natural environment and that food resources from the wild help to supplement cash shortfalls. County land use decision-making needs to take into account the importance of our subsistence economy.

Conclusion and Summary of Actions Requested of the Maui County Council Planning Committee

Provided herein is a summary of the actions we would like to request of your committee.

- Disregard the recommendations provided by Planning Director William Spence in his letter dated June 1, 2018 as they reflect bias and an abuse of authority against the will and intent of the Moloka'i community.

- ❑ Keep and approve Appendices 6.1 and 6.2 and do not replace with Appendix 9.2 of the Lānaʻi Community Plan.
- ❑ Approve and Adopt Chapters 10 and 11 of the East End and West End Policy Statements. Within this action, please approve our suggested changes as stated above.
- ❑ Restore appendices referenced in the original East End Policy Statement drafted in 2016; namely:
 - ❑ Traditional and Customary Practices Report for Manaʻe, Molokaʻi (February 2016)
 - ❑ A Framework for the ʻAha Moku System and Collaborative Governance
 - ❑ United Nations Declaration on the Rights of Indigenous Peoples
 - ❑ Advisory Council on Historic Preservation - Section 106 and the U.N. Declaration on the Rights of Indigenous Peoples: Intersections and Common Issues: Article 18 and Section 106
 - ❑ Manaʻe GIS Mapping Project (May 2008)
 - ❑ Table 5.1: Manaʻe Subsistence & Ahupuaʻa Management Plan Framework & Table 5.3: Community Suggestions for East Slope Management Plan
 - ❑ University of Hawaiʻi Archaeological Training Project, Kamalō, Molokaʻi, Hawaiʻi (December 2005)

We appreciate your careful consideration of our comments and recommendations. Mahalo for this opportunity to testify.

Me ka haʻahaʻa,

Malia Akutagawa
Harmonee Williams