Proposed Amendments to WUDP

Haiku Community Association respectfully requests the County Council to send the Draft Water Use and Development Plan back to the appropriate committee to amend the Plan and bring more clarify to these 4 areas:

**1) Proposed Ko'olau/Ha'iku Aquifer basal well plan option for Maui DWS central Maui system future water source.**

**Important background requirements for any future well project and their potential costs are missing in the WUDP and assumptions are being made without current data.**

**What needs to be added:**

**•**The Ko'olau/Haiku well strategy is mentioned at least 17 times, spread over 5 sections of the Maui WUDP.

• At least 3 different places the WUDP plan states that the Ha'iku aquifer has a large amount of available water that is not used or needed by local residents and can be transported elsewhere.

•  there is no firm PROOF of this high yield, and no discussion how much of the aquifer capacity would be needed to serve the Haiku 400 applicants waiting on the Upcountry meter list, and  additional needs of Haiku residents.

•  Haiku wells are described in several places as the  “lowest cost” new water source for Central & South Maui, but the full costs of the project are not referred to in the WUDP,  only the costs of land and construction.

• Those unexamined costs include:

additional well or wells to provide enough water supply to Haiku homes and farms for the next 20 years, to comply with Paia-Ha’iku Community Plan

studies of Haiku aquifer contamination by agricultural chemicals and long term treatment costs.

studies of Ha’iku aquifer contamination by cesspools and livestock waste

Studies of existing Ha'iku wells and springs that are the only water source of local residents

Studies of fisheries and gathering areas off the coast of Ha'iku that are dependent on groundwater flows

Studies of Ha'iku streams and costs of petitions to Water Commision to set stream flow standards for all Ha'iku streams, as required by the East Maui Consent decree

Creating a bonding mechanism to reimburse residents whose wells or springs are affected by the large capacity County wells if they are built.

• More realistic language about the unproven capacity of Haiku aquifer, and the much wider range of costs and requirements associated with he Haiku well plan should be included in the WUDP to be transparent. Currently the WUDP only states that "comprehensive hydrological studies” are needed.  The complete range of information needed and approximate costsm should be included.

2)  **WUDP needs more specific information and specific solutions about Upcountry priority list. WUDP states : “Identifying and allocating water resources to satisfy the Upcountry Meter Priority List and agricultural needs in the region are possibly the greatest challenges of this WUDP Update.”**

**What needs to be added:**

WUDP’s Upcountry meter priority list is discussion is based upon data from June 2014. This is not helpful to descison makers.

The WUDP appears to assume that the number of meters requested, and the water demand they create, is unchanged after 6 years of giving out meters. This does not seem accurate.

 The WUDP assumes that by 2030 more will be known about how many meter reservtions will never be used and how many need to be provided for.

It also assumes that larger projects on the meter list, like Hai'ilimaile developments will develop their own water sources, but it is not made clear if the County system is still asssuming it needs to provide a “back up” plan and find additional water to serve these projects.

 Updated data should be added to the WUDP on:

number of applicants still on the list as of June 2020

 estimated updated meter list water demand by area: Kula; Makawao, Ha’ilimaile, Pukalani and Ha'iku

 Breakdown of how many meter list reservations were for single homes/ small subdivisions and large subdivisions and water demand for each

Proposed water source and cost to implement the water source, for each region to meet water meter list demands, and how much additional water would be available for additional water   requests.

Number of applicants where hook up changes are impractical to afford, and DWS strategies to provide water to these families

3) **WUDP should directly discuss costs and benefits of alternative leaseholders/ management for EMI water system on state land to give MDWS security for its longrange water planning.**

• the East Maui ditch system is transporting water from public lands, yet it is “controlled” by a private company

• A number of  longterm DWS goals are described as depending upon agreements with A&B, but over a 20 year horizon, the WUDP should discuss a more self sufficient approach to management of publicly owned East Maui surface waters.

**What needs to be added:**

• The WUDP refers to studies of the EMI system that should be funded by the Maui DWS and maintenance investments, but puts forward no long term vision leading to relaible access and better management of its  legally allowed share of East Maui water in a 20 year plan.

• the WUDP does not mention that a Temporary Investigative Group  (“TIG”) was set up by the voluteer Board of Water Supply in 2019 to review options for public ownership and management of the EMI system, and a TIG report was released in October 2019. This information should be included.

•  A table should be created and amended to the WUD, to offer analyses of county’s options to have more say in the East Maui ditch system, and next steps, based upon the TIG report.

**4) WUDP should include a clear listing of what’s included in the water agreements DWS has with other parties and what water policies /strategies they would  influence over the next 20 years.**

**What needs to be added:**

 • DWS has source credit agreements with RCFC Kehalani LLC, Wailea Resort, and possibly others that guarantee certain amounts of water for various projects.

• This is not made clear in the WUDP.  The public is left to assume that water meters are simply assigned to those who request, rather than the reality that certain landowners have “reservations” of County water they can direct.

• Maui water department (DWS) has a  25 year Water Memorandum of Understanding (“MOU”) with A&B that was signed in 2000, and 2018 Water MOU update with A&B.

• These agreements allow a variety of water partnerships on projects in Ha’iku area, including the Haiku well plan,  that would award A&B “allocations” of water developed.

**•**Other private agreements with DWS are detailed in various WUDP Sections and the Plan should be consistent and transparent. These other agreements should be included, and the details discussed, in appropriate sections. Many would have bearing on future water planning decisions.