

Ha‘ikū Community Association

PO Box 1036

Haiku, HI 96708

<https://www.haikumaui.org/>

September 24, 2021

to: Board of Land and Natural Resources

Re: Agenda Item for FEIS on a Proposed Lease (Water Lease) for the Nāhiku, Ke‘anae, Honomanū, and Huelo License Areas

Aloha Chair Case and BLNR Members

Haiku Community Association (HCA) appreciates the difficult decision you have to read and evaluate such a large document as the Final EIS. HCA represents residents in the Huelo-Ha’iku area covered by the 96708 zip code: from Maliko Gulch to Kailua, Maui. Community needs have not been accurately reported or addressed in the petitioners’ EIS. On behalf of the impacted residents, farmers, and ranchers, the Association offers the following and appreciates the Board’s consideration.

None of the Ha’iku streams and 12 of the Huelo streams currently diverted by the EMI system have updated IIFS set, based upon factual data. An EIS missing this essential information should not be accepted by the BLNR. The diversion of hundreds of millions of gallons of water from these streams for the next 30 years will obviously have impacts on our streams; farms; traditional Hawaiian cultural users of streams; fisheries and community. These impacts are not analyzed in this EIS.

All of the Ha’iku-Huelo streams are important to local residents. Many small rural farmers in Ha’iku-Huelo live along these streams and need to turn to the streams for domestic water because there is no county water infrastructure to serve them. Many Ha’iku and Huelo streams with no updated, fact based IIFS are used to grow kalo or other tropical crops. Many of the streams are used for traditional subsistence gathering by kanaka maoli residents. These residents need adequate stream flow standards set for the 12 Huelo streams and the Haiku streams west of Kakipi gulch in order to be able to continue cultural traditions and pass on that knowledge to future generations. The FEIS makes no attempt to discuss impacts to these streams or their users in the context of the proposed 30 year leases.

The FEIS must make a good-faith effort to accurately quantify those needs in order to provide for adequate stream flow levels to assist these small farmers and traditional users in our community.

The FEIS assumes that all the water left in streams that were not part of the 2018 water commission decision to restore stream flows can be diverted to Mahi Pono’s fields. Both the weather and the demographics have changed since 2018.

HCA supports the comments the Sierra Club of Hawaii has sent regarding inadequate discussion in the FEIS of overall system waste and the need to significantly reduce that waste of Public Trust water resources. Many Huelo and Ha’iku residents have witnessed this waste firsthand in the aging EMI diversions, ditches and tunnels that pass through our community. The FEIS must address waste in the system BEFORE the water reaches Kamole Weir, not just after.

In the FEIS (Appendix J) is a report issued by the Department of Interior, Fish and Wildlife Service, in 2016. That report is unequivocal in its finding that stream diversion has a direct link to allowing *Culex* mosquitoes to flourish which in turn has brought avian malaria to East Maui. Our endemic bird species have no immunity to avian malaria and the effects have been deadly. For instance, Kiwikiu, the Maui parrotbill, is critically endangered, and is projected to be extinct within 10 years; the reason why is avian malaria has forced it into small remanent forests that are insufficient for it to flourish. The FEIS, in Section 4.2.4, makes the cynical observation that the damage is already done, so why bother to mitigate it at this point? We believe we must do better than that, that we should strive to restore more habitat for Kiwikiu and other honeycreepers which are now all on the endangered list. There are many things that have to happen, but the recommendation made by the US Fish and Wildlife Service about not creating mosquito habitat through inadequate stream flow is one that this FEIS needs to heed.

.

Please do not accept this EIS which leaves out the impacts to our community.

Mahalo for your consideration

HCA Board of Directors