

Maui Tomorrow Foundation
55 N. Church St Suite A-4
Wailuku, HI 96793

Sept 30, 2019

Re: WAI- 37 - March 2019 Draft: Water Use and Development Plan

To: Committee Chair Lee, WAI Committee members and Committee Staff:

Maui Tomorrow Foundation (MTF) has been tracking the Maui WUDP process for over a decade. We appreciate a chance to share our comments on the March 2019 Draft WUDP, and appreciate the many hours the MDWS staff has spent on the Plan.

The WUDP is mandated by state law (**§174C-31 Hawaii water plan**) to include basic data:

- The amount of water currently being used for Domestic, Commercial, Agricultural, Industrial, Irrigation and other purposes and any resulting problems or constraints on those supplies
- Future land uses and related water needs;
- The amount of water available for future use, from which sources
- Regional plans for water development, including **recommended and alternative plans, costs, adequacy of plans**, and relationship to the water resource protection and water quality plans.
- Policies and programs each County will use to prioritize water uses for: DHHL; Native Hawaiian traditional and customary practices; Domestic systems; Agriculture and Food self-reliance; and management of resources to adapt to changing weather patterns.

Given this framework, Maui Tomorrow offers the following comments:

Mahi Pono Farming Plans

Given the comprehensive scope of the WUDP, we are surprised that there is no discussion of the change in ownership of the HC&S Plantation lands to Mahi Pono, the plans that Mahi Pono is putting forth, and their water needs. This is a 15- year plan and Mahi Pono now owns a 50% interest in East Maui Irrigation; they are planning uses for 30,000 acres of agricultural land. Their specific water demand scenarios should be discussed as part of the WUDP, and should replace the discussion of the A&B diversified crop plans.

Comments by Maui Board of Water Supply

MTF has participated in a number of community meetings and hearings hosted by the BWS to consider the Draft WUDP. We support the considered suggestions they have put forward in their January 22, 2019 report to the DWS. We urge the WAI committee to carefully consider adding necessary language to support these suggestions.

Especially urgent is the BWS suggestion for a “Transition Plan, One-Water management plan, two departments working together.”

WUDP needs to discuss a transition to comprehensive water resource management: potable water, stormwater & reclaimed water managed as One Water. WUDP says to “assess” use of R-1 water and stormwater as part of a future use scenario, but studies have been done to assess “opportunities”. We need a plan to merge management of different sources of water, like Honolulu does.

RECEIVED AT WAI MEETING ON 9/30/19

Clear Goals and Implementation Process

MTF and allies have worked for years to support efforts for restoration of stream flows, restoration of stream life habitat, better management of high stream flows and raw water storage, reduced waste of diverted waters, improved watershed management, and productivity and regeneration of local soils to promote efficient water use in local farming. While we deeply appreciate that all of these topics are discussed in some form in the WUDP, there are no specific implementation strategies and timeframes that the WUDP commits to.

For example:

- a) A **timetable should be included in the WUDP for new reservoirs upcountry** to lessen reliance on stream flows during drought periods. This was recommended and costs discussed in the 2009 draft of the WUDP.
- b) WUDP needs to have clear goals to restore not just adequate “stream flows” but also viable habitat connectivity for native stream species to migrate. It should recommend that an **Engineering study** be done to determine which diversion structures need to be removed or modified to allow native stream species to migrate.
- c) WUDP must specify a timetable for **increased data collection on rainfall and monitoring of stream flows** in East Maui and should recommend restoring data gathering gauges to specific streams to build a sufficient data base for future water planning as part of adaptation to climate change. The DWS /BWS 2000 MOU with A&B (which was incorporated by reference in the September 14, 2018 EMI Water Delivery Agreement) states that: “BWS will develop and implement a stream flow monitoring program to provide current baseline data.” 20 years have passed. Where is this program?

Ahupua‘a Based Management

The WUDP makes many references to the benefits of traditional mauka-makai management of watersheds, yet there is no “action plan” to actually implement that management process on Maui. Local rural communities are left out of the major Watershed Partnerships funding and decision making. The BWS comments support a funding stream for community partnerships to reclaim the lower watersheds and restore their health and productivity. WUDP should include a timetable to implement this strategy along with estimated costs, as was done in the 2009 Draft WUDP. Better watershed management is the most concrete step Maui can take to maintain water productivity levels.

The WUDP makes some reference in the Ko‘olau Sector (p. 32 “16.3.3 Lessons from Native Hawaiian History”) to the concept of including **the full range of stakeholders in management of the East Maui stream diversion systems.**

“Perhaps past strategies of sharing distribution and timing of water flows can be adopted in order for all water users to be supplied with this important resource. **Consortiums of water partners have been discussed as options to ownership and management of the East Maui Irrigation water system. Possible consortium stakeholders could include watershed management partners, Alexander and Baldwin/HC&S, kuleana water users and native Hawaiian stakeholders.**”

This is also a recommendation put forward in the BWS comments and the BWS has a Temporary Investigative Group looking at possible options to management/ownership of the system. The WUDP should include a more expanded analysis of this concept and recommend next steps that would need to be taken to get needed financial and technical information on the concept. Including such an action in the WUDP would demonstrate an authentic commitment to the idea of ahupua‘a based management of water resources.

Adaptation to Climate Change/ Water Efficiency and Conservation Strategies

The WUDP “Water Conservation and Efficiency” section is very detailed, as was the same section in the 2009 WUDP draft. The statement included under “Conservation Targets” on p. 191 offers a clear conclusion:

“The 2035 projected potable demand could be theoretically reduced based on an 8 percent reduction in per capita demand. After review by CWRM staff of this draft chapter, conservation demand targets were substituted for conservation supply targets. **However, consistent with the Freshwater Initiative, reduction in MDWS residential demand of 8 percent per capita has the potential to offset up to 9 mgd of municipal potable source and delay source development over the 20-year planning period.**”

The “Action Plan” to reach the 8% reduction (which is the same goal that Honolulu Board of Water Supply has set, and has been successful at meeting in the past,) appears to be some future “Water Conservation Plan.” We urge the WDUP language to reflect the immediacy of our situation and set direct goals and a real plan for reduction of residential, commercial, industrial and irrigation potable water demands in every future water demand chart in each urban Aquifer Sector.

Mahalo nui loa for your consideration of our comments. Please call upon us for any additional information needed.

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