

# EAST MAUI IRRIGATION COMPANY, LLC

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## BLNR CONDITIONS FOR EAST MAUI WATER PERMIT STATUS OF COMPLIANCE AS OF JUNE 30, 2025

### CONDITIONS PER THE BLNR'S DECEMBER 13, 2024 DECISION

- 1. There shall be no waste of water. System losses and evaporation shall not be considered as a waste of water provided that system losses do not exceed 22.7%. The rate of system losses shall be calculated as the amount of water diverted or extracted into the Mahi Pono field system that is not used for diversified agriculture purposes, excluding the amount of water diverted for the County of Maui; then divided by the total amount of water diverted or extracted into the Mahi Pono field system.***

Status: All diverted water is being put to beneficial agriculture use or municipal use, as the diverted water supplies the County of Maui for its Upcountry Maui water systems, the Kula Ag Park, Central Maui fire suppression needs, municipal users who do not currently have access to the County DWS delivery system, and agricultural uses in Central Maui on lands now owned and managed by Mahi Pono. Exhibit A notes system losses and evaporation as water uses, as they are an essential element of transporting water in an agricultural ditch system to the end users.

In Q2 2025, Mahi Pono continued focusing on the maintenance and growth of its existing crops. As of June 30, 2025, the planted acreage in Mahi Pono's East Maui fields totaled 12,585 acres. During this most recent quarter, EMI diverted an average of 25.99 MGD.

The Permittees – and by extension, Mahi Pono – remain committed to the efficient use of East Maui stream water. Mahi Pono's total amount of water usage, together with that of the County of Maui, will not exceed the limits of the IIFS decisions at any point during its expansion.

- 2. Any amount of water diverted under the revocable permit shall be for reasonable and beneficial uses consistent with the character of use and always in compliance with the interim instream flow standards (IIFS), as may amended from time to time by CWRM. The Permittee shall also comply***

***with all other conditions required by CWRM regarding the streams that water may be diverted from under this revocable permit, including stream flow restoration and closure of diversions.***

Status: See response to condition #1.

***3. Permittee shall provide a report on the progress regarding the removal of diversions and fixing of the pipe issues before the end of the revocable permit term.***

Status: All initial approvals of the stream diversion work permits have been received from the CWRM to abandon the diversions on the "taro streams" to fully restore their streamflow permanently, as voluntarily offered by EMI, over and above the requirements of the 2018 IIFS.

The Permittees have also initiated discussions with CWRM staff on IIFS compliance for the 'non-taro streams' that were part of the 2018 IIFS decision. A draft work plan was submitted to CWRM for 41 diversions on 17 additional streams that are implicated by the 2018 IIFS decision. Before issuing the needed permits to undertake the work, CWRM will need to conduct site visits to each diversion site. CWRM's process of visiting each site is currently ongoing. While that process is ongoing, the Permittees comply with the IIFS decision regarding instream flow requirements (i.e., by individual streams and the total quantity of flow). This compliance is subject to CWRM staff verification. CWRM most recently verified IIFS compliance during a community site visit in June 2024, and an additional site visit in October 2024. Connectivity requirements of the IIFS decision are being met to the extent possible without the physical modifications that require governmental reviews and approvals. The draft work plan transmitted by the Permittees to the CWRM does address means of achieving full connectivity compliance for these additional non-taro streams.

A summary of permits for remaining work related to the 2018 and 2021 IIFS has been included in the transmittal of this quarterly report.

As to the pipe issue, this permit condition was initially imposed in 2018, and we believe it relates to a pipe at Pualoa (aka Puolua) Stream at the Lowrie Ditch. In

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a previous status report, we reported that the pipe had been extended to provide wetted pathways for the movement of stream biota on Pualoa Stream. At the 2018 BLNR hearing on the subject RP's (for 2019), statements were made that the pipe needs to be extended further to go under the road and that two 4" rusted pipes needed to be removed. Accordingly (and as reported in previous quarterly reports), the two 4" pipes have since been removed from the watershed and a new design intended to improve fish migration has been incorporated in the diversion modification plan for compliance with the IIFS and approved by the CWRM in its approval of the Category 3 SDWPA. This specific scope of work was part of the overall work plan referenced earlier.

- 4. Permittee shall continue to clean up and remove debris from the areas where the streams that water may be diverted from under this revocable permit are located, and staff shall inspect and report every three months on the progress of the clean-up. For purposes of clean-up, debris shall not include any structure and equipment that is either currently used for the water diversions, or for which CWRM has not required removal; "trash and debris" shall be defined as "any loose or dislodged diversion material such as concrete, rebar, steel grating, corrugated metals, railroad ties, etc., that can be removed by hand (or by light equipment that can access the stream as is)."***

Status: The Permittees have established several standard operating procedures to address the cleanup of trash and debris in the license areas. Besides recognizing unnecessary debris in the field during routine maintenance tasks, EMI has conducted specific identification and removal operations of debris that has been observed from previous fieldwork. EMI continued to be vigilant about monitoring unused material. No removals occurred/were necessary in Q2 2025.

EMI will also continue removing any equipment and excess materials it brings into the license area to perform work on the ditch system as soon as the job(s) is completed, which includes diversion modifications required to meet the 2018 IIFS.

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EMI understands the term "Trash and Debris" is further defined as noted in the DLNR staff submittal. As mentioned previously, EMI has established several standard operating procedures to address the cleanup of trash and debris in the license areas. Besides recognizing unnecessary debris in the field during routine maintenance tasks, EMI has conducted specific identification and removal operations of debris that has been observed from previous field work. EMI also has a practice of removing any equipment and excess materials it brings into the license area to perform work on the ditch system as soon as the job(s) is completed. These practices continue to apply to the "Trash and Debris" term as more clearly defined by DLNR staff.

**5. *The revocable permit shall be subject to any existing or future reservations of water for the Department of Hawaiian Home Lands (DHHL);***

Status: EMI acknowledges that the RPs shall be subject to any existing or future reservation of water for the DHHL.

**6. *The County of Maui shall coordinate with an interim committee to discuss water usage in the areas where the streams that water may be diverted from under this revocable permit are located. The committee shall consist of seven members, representing EMI/Mahi Pono, Farm Bureau, Office of Hawaiian Affairs, the Native Hawaiian Legal Corporation, the Haiku Community Association, the Sierra Club, Na Moku Aupuni O Ko'olau Hui, the County of Maui, the Department of Hawaiian Homelands, and the Aha Moku Advisory Council, and interested members of the Huelo community as determined by the County of Maui. The interim committee shall meet at least monthly. The County of Maui shall be responsible for organizing and scheduling these meetings.***

Status: The monthly meetings of the interim RP Committee are being organized and scheduled monthly by the County of Maui. Generally, EMI provides updates on the work related to the implementation of the IIFS, and Mahi Pono supplies an update on farming operations, as outlined by the agenda provided by the County of Maui. EMI and Mahi Pono also answer any follow-up questions by the interim Committee.

**7. It is an essential component to the Board's stewardship of the water resource to understand how much water is being diverted. Permittee shall therefore provide quarterly written reports to the Board of Land and Natural Resources (Board) containing (at a minimum) the following information:**

- a. The amount of water actually used on a monthly basis, including the monthly amount of water delivered for: the County of Maui Department of Water Supply and the County of Maui Kula Agricultural Park; diversified agriculture; industrial and non-agricultural uses; and reservoir/fire protection/hydroelectric uses. Descriptions of diversified agricultural uses shall also provide information as to acreage, location, crop, and use of the water. Industrial and non-agricultural uses shall specify the character and purpose of water use and the user of the water.

Status: The amount of water used on a monthly basis, including the monthly amount of water delivered for the County of Maui DWS and Kula Ag Park, diversified agriculture, industrial and non-agricultural uses, and reservoir/fire protection/hydroelectric uses can be found in the table attached as Exhibit A. The acreage, location, crop, and users of agricultural water, and the specifics on industrial and non-agricultural uses can be found in the table attached as Exhibit B.

As Mahi Pono prepares new fields for planting, they continue to install new irrigation systems that focus on efficient water application measures. In addition to these new systems, we are also installing weed mat throughout the farm, which help the soil maintain moisture by reducing evaporation. Compared to prior years, the cumulative water efficiency effects of these initiatives can be seen in the proportionate reduction in the amount of water remaining in the final column of the table attached as Exhibit A.

- b. The estimated amount of water required for each crop per acre per day for the previous quarter and how much water is projected to be required per acre per day for the forthcoming quarter.

Status: The chart attached as Exhibit C shows the average amount of daily irrigation applied to each crop during each quarter. The chart also shows the projected total water demand for each crop in the forthcoming quarter (see third column, "Total Crop Requirement"). Each crop's total water demand is met through a combination of irrigation and rainfall, and affected by multiple factors including weather patterns across the farm, so the quarterly projection is expressed as a total water demand figure. These figures are sourced from the environmental impact statement accepted by the Board in 2021.

- c. The report shall disclose which structures on or next to streams have been removed, which ones have been modified, which ones remain to be modified, what remains to be done before they are modified, what impediments exist to their modification, what agencies need to give their approval before modifications can be made, when the Permittee made requests to the applicable agencies for approval and when the modifications are expected to be completed.

Status: EMI prioritizes its compliance with the CWRM order and has been working with CWRM staff on implementation plans and permitting. EMI notes that the language of the CWRM order relating to the removal of artificial structures is spelled out on page 269 of the D&O, items i, j, and k which State in part that "it is intended that diversion structures only need to be modified to the degree necessary to accomplish the amended IIFS and to allow for passage of stream biota, if needed" and "the intent of the Commission is to allow for the continued use and viability of the EMI ditch system and will not require the complete removal of diversions unless necessary to achieve the IIFS." A status update is provided in a separate supplemental chart submitted with this Q2 2025 quarterly report.

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- d. Update on removal of trash, unused man-made structures, equipment, and debris that serve no useful purpose, including photographs and documenting any reports of such items that Permittee has received from the Department, other public or private entities and members of the general public and the action(s) taken by Permittee, if any, to remove the reported items.

Status: See above response to #4 above.

- e. A listing of all reservoirs in the A&B/EMI water system serviced by the revocable permit, with the following information provided for each:

The capacity of each such reservoir;

The surface area of each such reservoir;

What fields are irrigated by each such reservoir;

Which reservoirs are lined, and with what material, and which are not;

The estimated amount of evaporation per day from the surface of each such reservoir;

An analysis of the cost and time to line at least one such reservoir;

Information on any reservoirs planned to be taken out of service;

The depth and volume of water in each reservoir (as of the last day of each month);

How long it would take on average for each full reservoir to be emptied if now water were to flow into or be deliberately

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removed from it (i.e. how long until evaporation and seepage drains it); and

The amount of water used for hydroelectric purposes, if any.

Status: A table containing most of the information requested above is attached as Exhibit D. Evaporation estimates are based on actual reservoir water levels during Q2 2025, with the figures being displayed in gallons per day.

In addition to the information in Exhibit D, we previously determined an estimated unit cost in 2022 of \$7.00 per square foot (sloped) to line a reservoir, plus estimated engineering costs typically being between \$30k - \$60k per reservoir. Adjusting for CPI, it is assumed that the current estimated unit cost is \$8.17 per square foot as of Q4 2024. If we apply these costs to a reservoir with a 10-acre surface area and assumed slope adjustment of 25%, then the resulting estimate would be approximately \$4.45M.

- f.** The number, location, timing, and approximate acreage of fires fought during the quarter using water from reservoirs supplied with water from the A&B/EMI system.

Status: There were zero fires fought during Q2 2025 using water from reservoirs supplied with water from the A&B/EMI system.

- g.** The names and locations of the reservoirs from which water was drawn to fight fires during the quarter, together with:

Status: No water was used for hydroelectric purposes during the quarter.

- h.** A listing of all irrigation wells in the A&B/EMI water system serviced by the RPs, with the water levels and chloride levels in each well that is in active use noted.

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Status: In Q2 2025, Wells 2, 3, 9, 12 and 13 were in active use. Chloride levels measured during the quarter are provided below:

- Well #2
  - pH – 7.2
  - Sodium – 226 mg/L
  - Water Level – 37 Inches
  
- Well #3
  - pH – 7.5
  - Sodium – 106 mg/L
  - Water Level – 68.5 Inches
  
- Well #9
  - pH – 7.5
  - Sodium – 152 mg/L
  - Water Level – 31 Inches
  
- Well #12
  - pH – 7.1
  - Sodium – 178 mg/L
  - Water Level – 19.25 Inches
  
- Well #13
  - pH – 7.0
  - Sodium – 143 mg/L
  - Water Level – 29.5 Inches

Each quarterly report shall be submitted in a format with tracked changes that clearly show the differences/updates from the prior quarter.

Such quarterly reports shall be “due” to the DLNR one month after the last calendar day of the subject quarter. Thus, the reports shall come due as follows:

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Q1 Report – April 30, 2025

Q2 Report – July 31, 2025

Q3 Report – October 31, 2025

Q4 Report – January 30, 2026

Status: This Q2 2025 report is the first to be submitted with changes tracked after the re-numbering of conditions. The deadline to submit quarterly reports is noted, and EMI is committed to timely submittals of all future reports.

- 8. *In addition to the quarterly report, the Permittee shall provide monthly reports containing at minimum, the Permittee's monthly water use amounts and the total planted acreage.***

Status: EMI/Mahi Pono has provided and will continue to submit monthly water usage reports, including the total planted acreage.

- 9. *Require Permittee to advise any third-party lessees, that any decisions they make are based on these month-to-month revocable permits for water unless or until a license is issued.***

Status: All third-party lessees have been informed through existing language in their lease agreements that the availability of water is subject to change based on various conditions, one of which would be the nature of the water availability from East Maui through an annually renewed revocable permit or an eventual permanent lease.

- 10. *Permittee shall cooperate with CWRM and the Department's Division of Aquatic Resources (DAR) in facilitating studies, site inspections and other actions as necessary to address the streams that water may be diverted from under this revocable permit.***

Status: EMI continues to be in contact with CWRM personnel regarding site visits to evaluate diversions that weren't covered by the 2018 D&O. Such site visits most recently occurred in Q2 2024, related to the amendment of the Huelo Streams IIFS passed by CWRM in 2022. CWRM field staff conducts these site

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visits on a stream-by-stream basis. EMI has previously contacted DAR and has expressed willingness to cooperate with any DAR activities related to the DAR work on streams outside the license area. Permittees also note that the 2024 RP allows for the development, diversion, and use of water only; there was no disposition of the land area covered by the prior revocable permits. As noted in the December 2023 staff submittal, the agreement between the Territory of Hawaii and EMI ("1938 Agreement") provides EMI a perpetual easement from the Territory to convey all water covered by any water license held by EMI through the portions of the "aqueduct" crossing government lands situated in East Maui extending from Nahiku to Honopou inclusive. Because the existing aqueduct system is already covered by the easement in the 1938 Agreement, there was no need for an additional land disposition. Accordingly, DAR has full access to the area.

***11. Permittee shall work with CWRM and DOFAW to determine whether there are alternatives to diversion removal that effectively prevent mosquito breeding and can be feasibly implemented. Permittee shall include the status of alternatives in its quarterly reports.***

Status: EMI has worked with CWRM in the context of the earlier discussion with DOFAW regarding diversion structures that can impede free flow of water and create habitat for mosquito breeding. Considerable evaluation and analysis have been conducted by the CWRM and EMI on nine "Category 1" diversions regarding additional work to be done on these diversions to mitigate these and other issues. CWRM has met with stakeholders to discuss this plan, and CWRM staff presented a proposed mitigation plan which was approved at CWRM's January 30, 2024 meeting. This plan calls for additional removal of stream diversion structures. Permittees are working with consultants to obtain the necessary approvals/sign offs from the State Historic Preservation Division and the County of Maui Planning Department, which are required before work can begin. Other regulatory agency reviews/approvals, including the Army Corps of Engineers and the Office of Conservation and Coastal Lands, will be needed once those two agencies sign off.

**12. If the Board finds that a use of water is not reasonable and beneficial and does not comply with the permitted uses, Permittee shall cease such use within a timeframe as determined by the Department.**

Status: EMI remains willing to comply with this requirement and stands ready to assist the Board in any way it can regarding this matter.

**13. For water used for agricultural crops, Permittee is to estimate how much water is required for each crop per acre per day.**

Status: Water requirements for each crop is highly dependent on several factors, including soil composition, weather, and the maturity of the crop itself. That said, the average water requirements for Mahi Pono's agricultural crops at full maturity are estimated to be as follows:

- Orchard Crops - 5,089 gallons per acre per day
- Row Crops - 3,392 gallons per acre per day
- Tropical Fruits - 4,999 gallons per acre per day
- Energy Crops - 3,392 gallons per acre per day

These estimates are consistent with the estimated water requirements contained in Table 3 of Appendix I (Agricultural and related Economic Impacts) of the EIS. The average water requirements listed above are reflective of the crops' collective water needs (irrigation & rainfall) at full maturity. This differs from the reported irrigation average, which is reflective of the irrigation consumption (excluding rainfall) of immature crops.

**14. Permittee shall look into supplying the Maui Invasive Species Committee with water, and if feasible, and despite it not being an agricultural use, this would be considered a reasonable and beneficial and permitted use under the revocable permit.**

Status: EMI/Mahi Pono have successfully provided MISC with water to support their operations starting in Q1 2023. In Q2, EMI successfully installed a meter on the pipeline supplying MISC with water. The total amount of water used by MISC

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between April 2025 – July 2025 was 21,200 gallons, and the Q2 2025 portion of this use is accounted for in the “*Other*” column in Exhibit A.

- 15. No later than August 1, 2025, Permittee shall provide an updated plan to reduce system losses including planned system upgrades, specific measures to more efficiently use water, proposed implementation timeline, and estimates on the amount that system losses may be reduced.**

Status: A separate report summarizing EMI’s and Mahi Pono’s water efficiency efforts is submitted with this Q2 2025 quarterly report. The measures implemented by EMI and Mahi Pono have been working. For the first half of 2025, the average amount of system losses was less than 11%, which is well below the 22.7% system loss rate deemed acceptable by both the BLNR and CWRM. In fact, Mahi Pono’s system losses are often less than the reported system losses of many potable municipal systems. This level of efficiency is due to Mahi Pono’s investment in efficient water use on-farm. Mahi Pono remains committed to the efficient use of water and plans to continue with these effective efforts.

- 16. Based on the 2018 CWRM Decision and the information presented here, the Board determines that reasonable beneficial use for diversified agriculture to Applicant under a month-to-month revocable permit on 30 days’ notice is 3263 gpad.**

Status: EMI/Mahi Pono remains compliant with this condition.

- 17. As a condition to the permit, the Permittee shall provide no more than 5.25 mgd, averaged monthly, to the County of Maui daily, which is the amount the Board finds to be the reasonable and beneficial allocation of water.**

Status: EMI and the County of Maui remain compliant with this condition.

- 18. Therefore, the total amount of water allocated under this revocable permit shall be:**

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- *The amount of water equal to 3263 gallon per acre a day multiplied by the total amount of planted acreage to be used by the Permittee for diversified agriculture and other existing uses, averaged annually less 1 million gallons per (mgd) day and:*
- *5.25 mgd to the County of Maui Department of Water Supply for the Kamole Treatment Plant and the County of Maui Kula Agricultural Park on a monthly average.*

Status: See responses to conditions #16 and #17.

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**EXHIBIT A – MONTHLY WATER USAGE**  
All Figures in Millions of Gallons per Day ("MGD")

Month	East Maui Surface Water @ Honopou	East Maui Surface Water @ Maliko	East Maui Surface Water Gained from Area Between Honopou and Maliko	Groundwater Pumped on-Farm	County of Maui DWS <sup>1</sup>	County of Maui Ag Park <sup>2</sup>	Diversified Agriculture <sup>3</sup>	Historic / Industrial Uses <sup>4</sup>	Reservoir / Seepage / Fire Protection / Evaporation / Dust Control / Hydroelectric <sup>5</sup>	
									Diverted Reserve to meet Contractual Obligation to County DWS & Ag Park <sup>6</sup>	Other <sup>7</sup>
January	31.28	33.35	2.07	11.54	2.18	0.55	34.64	0.06	2.52	4.93
February	21.04	23.42	2.38	7.10	2.88	0.38	24.09	0.06	1.99	1.12
March	23.58	26.15	2.56	11.97	2.85	0.51	31.20	0.06	1.89	1.60
April	27.37	29.48	2.11	12.78	2.74	0.52	34.17	0.06	1.99	2.78
May	25.94	28.34	2.40	16.48	2.58	0.52	39.26	0.07	2.15	0.24
June	24.65	25.38	0.73	25.98	3.71	0.61	40.77	0.07	0.93	5.27
<b>Average</b>	<b>25.64</b>	<b>27.69</b>	<b>2.04</b>	<b>14.31</b>	<b>2.82</b>	<b>0.52</b>	<b>34.02</b>	<b>0.06</b>	<b>1.91</b>	<b>2.66</b>

1. The numbers in this column are based on reports received from the County of Maui and have not been independently verified by EMI.
2. The numbers in this column are based on reports received from the County of Maui and have not been independently verified by EMI.
3. The numbers in this column are primarily comprised of Mahi Pono's water use for diversified agriculture, as well as the other agricultural uses described in Exhibit B of the quarterly RP reports.
4. Historical/Industrial Uses are non-HC&S uses that have historically relied on water from the EMI Ditch System, even after the closure of HC&S. These include uses by entities located either adjacent to or within the boundaries of the farm and are further described in Exhibit B. Mahi Pono installed meters in March 2022 thus, starting with the Q2 2022 report, the figures reported in this column will reflect actual usage based on those meters. As previously mentioned, HC&D's water usage is no longer accounted for in this column as HC&D is obtaining water from its own well.
5. The numbers in these columns include water not separately accounted for in the columns to the left. The water in on-farm reservoirs is available for use by the County of Maui against brush fires, the risk of which has increased due to the reduction of the irrigated acreage following the cessation of sugar

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cultivation but is decreasing as Mahi Pono continues to implement its farm plan. Seepage and evaporation inherent to an agricultural ditch system are also included in this column. The water used by the Mahi Pono hydroelectric system is non-consumptive and is returned to the ditch after being used to generate clean energy. The water is re-used consumptively by one of the other uses, or if there is no reuse, ends up in the reservoirs.

6. The Board has limited the amount of water that may be made available to the County to 5.25 MGD, averaged monthly. The numbers in this sub-column reflect the portion of the 5.25 MGD that is made available to the County every day, that the County does not use (i.e., 5.25 MGD less the sum of the amounts used by the County DWS at Kamaole Weir and Ag Park). Water that is not used by the County remains in the Ditch System, is transported to Central Maui and any excess is directed to reservoirs located on the former plantation.
  
7. The numbers in these columns reflect the amount of water not separately accounted for in the columns entitled "County of Maui DWS," "County of Maui Ag Park," "Diversified Agriculture," and "Historic/Industrial Uses" less the reserve needed to meet EMI's contractual obligations to the County of Maui. As has been explained in the past, EMI/Mahi Pono cannot rely on receiving any specific amount of the water provided to the County of Maui to meet the contractual obligations to the County DWS and Kula Ag Park that is not actually consumed by the County ("DIVERTED RESERVE") for the purposes of planning to meet the irrigation needs of Mahi Pono's crops. The amount is unpredictable and unreliable; however, EMI and Mahi Pono do make an effort to use the Diverted Reserve for crop irrigation when feasible.

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**EXHIBIT B – WATER USAGE SPECIFICS  
Diversified Agriculture Use**

<b>Entity</b>	<b>Crop</b>	<b>Field</b>	<b>Acreage</b>
<i>Mahi Pono</i>	Macadamia	205	122
<i>Mahi Pono</i>	Citrus	206	200
<i>Mahi Pono</i>	Macadamia	208	73
<i>Mahi Pono</i>	Citrus	209	351
<i>Mahi Pono</i>	Forage Crops	213	107
<i>Mahi Pono</i>	Citrus	300	305
<i>Mahi Pono</i>	Coffee	301	273
<i>Mahi Pono</i>	Coffee	302	6
<i>Mahi Pono</i>	Citrus	303	161
<i>Mahi Pono</i>	Citrus	306	271
<i>Mahi Pono</i>	Coffee	309	138
<i>Mahi Pono</i>	Coffee	310	369
<i>Mahi Pono</i>	Citrus	311	150
<i>Mahi Pono</i>	Avocado	404	166
<i>Mau Best (Tenant)</i>	Sweet Potato	408	281
<i>Mau Best (Tenant)</i>	Sweet Potato	409	180
<i>Mahi Pono</i>	Citrus	500	273
<i>Mahi Pono</i>	Citrus	501	83
<i>Mahi Pono</i>	Citrus	502	290
<i>Mahi Pono</i>	Citrus	503	144
<i>Mahi Pono</i>	Citrus	504	294
<i>Mahi Pono</i>	Citrus	505	240
<i>Mahi Pono</i>	Citrus	506	157
<i>Mahi Pono</i>	Citrus	507	189
<i>Mahi Pono</i>	Citrus	508	183
<i>Mahi Pono</i>	Citrus	508B	213
<i>Mahi Pono</i>	Citrus	509	79
<i>Mahi Pono</i>	Citrus	510	181
<i>Mahi Pono</i>	Citrus	511	161
<i>Mahi Pono</i>	Citrus	512	132
<i>Mahi Pono</i>	Macadamia	600	380
<i>Mahi Pono</i>	Citrus	601	221
<i>Mahi Pono</i>	Citrus	602	196

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**EXHIBIT B – WATER USAGE SPECIFICS (Continued)  
Diversified Agriculture Use**

<i>Mahi Pono</i>	Citrus	603	262
<i>Mahi Pono</i>	Citrus	604	343
<i>Mahi Pono</i>	Citrus	605	394
<i>Mahi Pono</i>	Citrus	606	134
<i>Mahi Pono</i>	Mixed	608	70
<i>Mahi Pono</i>	Forage Crops	608	82
<i>Mahi Pono</i>	Row Crops	608	44
<i>Mahi Pono</i>	Forage Crops	609	70
<i>Mahi Pono</i>	Citrus	610	40
<i>Mahi Pono</i>	Macadamia	611	253
<i>Mahi Pono</i>	Citrus	701	269
<i>Mahi Pono</i>	Citrus	702	232
<i>Mahi Pono</i>	Citrus	703	150
<i>Mahi Pono</i>	Citrus	704	214
<i>Mahi Pono</i>	Citrus	705	55
<i>Mahi Pono</i>	Row Crops	706	145
<i>Mahi Pono</i>	Forage Crops	707	40
<i>Mahi Pono</i>	Citrus	708	299
<i>Mahi Pono</i>	Forage Crops	717	60
<i>Mahi Pono</i>	Citrus	800	122
<i>Mahi Pono</i>	Citrus	801	281
<i>Mahi Pono</i>	Citrus	803A	127
<i>Mahi Pono</i>	Pongamia	803B	32
<i>Mahi Pono</i>	Avocado	803C	6
<i>Mahi Pono</i>	Citrus	805	268
<i>Mahi Pono</i>	Coffee	807	120
<i>Mahi Pono</i>	Mixed	807	39
<i>Mahi Pono</i>	Citrus	808	158
<i>Mahi Pono</i>	Citrus	809	251
<i>Mahi Pono</i>	Citrus	809X	72
<i>Mahi Pono</i>	Citrus	813	448
<i>Mahi Pono</i>	Citrus	814	342
<i>Mahi Pono</i>	Citrus	818	266
<i>Mahi Pono</i>	Citrus	901A	45
<i>Mahi Pono</i>	Citrus	911	82
<i>Mahi Pono</i>	Citrus	911B	201
<b>TOTAL</b>			<b>12,585</b>

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**EXHIBIT B – WATER USAGE SPECIFICS (Continued)  
 Historic / Industrial Uses**

Water Users	Source/Delivery Point	Water User's Location	Relationship to EMI / A&B / Mahi Pono	Use
Tenant of County Central Maui Landfill	Pumped from Haiku Ditch	3-8-003-019	Gov't Tenant	General Use for Compost Operation
New Leaf Ranch (Non- Profit)	702 Cistern	3-8-006-029	Tenant	Irrigation water for non- profit providing ag-related work opportunities and training as mental health & substance use dependency treatment
Costo Maddela	Haiku Ditch	3-8-001-001	Tenant	Pasture & Animal Water

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**EXHIBIT C – GPAD by Crop**

Crop	Acreage	Total Crop Water Requirement in GPAD* (per EIS)	Applied Water**						AVG Applied Water by Crop in GPAD (Q1)	AVG Applied Water by Crop in GPAD (Q2)
			JAN	FEB	MAR	APR	MAY	JUN		
			GPAD	GPAD	GPAD	GPAD	GPAD	GPAD		
Macadamia	828	5,089	3,107	2,287	2,234	2,999	4,733	4,250	2,543	3,994
Citrus	9,529	5,089	2,754	1,996	2,556	2,754	3,037	3,422	2,435	3,071
Forage Crops	359	1,161	4,673	1,449	7,546	5,127	4,392	3,711	4,556	4,410
Coffee	906	5,089	3,935	1,613	2,414	2,304	2,847	3,587	2,654	2,913
Avocado	172	4,999	5,046	3,102	1,630	2,087	2,092	3,546	3,259	2,575
Sweet Potato	461	3,392	2,379	2,402	2,169	2,169	2,239	2,169	2,317	2,193
Mixed	109	3,392	1,457	1,685	2,141	2,753	3,474	1,108	1,761	2,445
Row Crops	189	3,392	2,395	1,903	1,958	5,269	5,308	2,994	2,085	4,524
Pongamia	32	3,392	0	0	0	0	0	0	0	0
<b>AVERAGE / TOTAL</b>	<b>12,585</b>	<b>3,888</b>	<b>2,861</b>	<b>1,826</b>	<b>2,516</b>	<b>2,829</b>	<b>3,125</b>	<b>2,754</b>	<b>2,401</b>	<b>2,903</b>

\*Comprised of total plant needs from all sources, including rain and irrigation.  
\*\*GPAD figures in BLUE are IRRIGATION-ONLY figures, and are NOT representative of total plant needs.

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**EXHIBIT D – RESERVOIR INFORMATION**

Reservoir No.	Tax Map Key	Capacity Million Gallons	Surface Area (Acres)	Jan	Jan	Feb	Feb	Mar	Mar	Apr	Apr	May	May	Jun	Jun	Fields Fed by Reservoir	Lined	Estimated Evaporation Rate	Estimated Time for Full Reservoir to be Emptied by Seepage or Evaporation (Days)
				Depth (Ft)	Volume (MG)														
14	2-5-04:39	9.50	1.50													100; 101	No		
15	2-5-04:39	8.30	1.10													101	No		
20	2-5-03:10	48.90	10.20													312; 314	No		
21	2-5-04:39	18.60	6.90													111; 113; 200	No		
22	2-5-03:10	43.80	10.60													201; 202	No		
24	2-5-03:10	15.00	3.60													201	Yes		
25	2-5-03:09	40.20	9.70													205	No		
30	2-5-03:01	21.00	9.00													300; 312	No		
33	2-5-02:02	46.50	8.00													304; 304; 313	No	28,802	361
40	2-5-02:01	62.80	13.50													410; 400; 401; 413 (County Use)	No		
42	2-5-02:01	10.40	3.20													400; 401; 403	No	10,103	26
52	3-8-03:04	74.00	20.00													504; 511	No		
60	3-8-01:06	80.50	20.80													600; 611	No		
61	3-8-01:01	53.10	9.00													604	No	31,423	57
70	3-8-01:01	19.30	5.00													Mud Pile 710	No		
80	3-8-03:02	41.10	12.00													800; 801	No		
81	3-8-04:22	36.70	13.80													803; 805; 808; 809	No	44,454	51
82	3-8-04:22	17.90	7.40													810; 811; (812; 815; 816; 818; 819; 822; 823; Res. Ditch	No		
84	3-8-03:02	35.10	8.00													701; 702; 703; (807; 813; 814; Res. Ditch)	No		
90	3-8-08:05	46.00	15.80													737; 761; 915; 917	No	56,862	270
Haiku	(2)2-7-003:05 & 081	57.9	27.30													Haiku Ditch	No		
Paunaea	(2)2-7-008:038 & 056	32.5	6.80													Haiku Ditch	No		
Peahi	(2)2-8-002:018	22	5.80													Haiku Ditch	No		
Kapalaalea	(2)2-8-007:001	49.7	8.70													Haiku Ditch	No		
Papaana	(2)2-9-014:004	42.5	9.00													Center Ditch to Lowrie Ditch	No		
9	2-5-004:039	1.00	NA													110	No		
10	2-5-004:039	9.50	NA													116	No		
12	2-5-004:039	9.00	6.70													109	No		
23	2-5-005:019	13.70	NA													200	Yes*		
26	2-5-005:019	10.10	NA													208	No		
29	2-5-005:019	9.90	NA													213	No		
31	2-5-003:031	5.10	NA													303	No		
32	2-5-002:002	9.80	NA													304	No		
34	2-5-003:010	8.10	NA													306	No		
35	2-5-002:002	15.00	5.40													310; 311; 505	No		
41	2-5-002:001	8.90	NA													402; 404	No		
43	2-5-001:001	13.50	4.00													Above 417.	No		
44	2-5-001:008	3.80	NA													415; 414; 418	Yes		
45	2-5-001:008	4.20	NA													208; 500; 507; 508	No		
50	3-8-003:005	8.40	NA													502; 505	No		
51	3-8-003:004	15.20	NA													817; 821	No		
83	3-8-004:002	6.40	4.70																

Not all reservoirs are currently in use.  
 \*Reservoir 23 was lined with concrete/linner. Lining is currently deteriorated.  
 \*\*Kaunapali decommissioned in 2022/2023.  
 \*\*\*Kapalaalea decommissioning project completed in 2024  
 \*\*\*\*Evaporation rate is the average gallons per day evaporation for the quarter

Unregulated/Used Sparingly = In and out water -1 day  
 Unregulated/Rarely Used = Passthrough only