



August 17, 2009

Nancy Rumrill
U.S. Environmental Protection Agency
Ground Water Office (WTR-9)
75 Hawthorne Street
San Francisco, CA 94105

RE: Revised Draft UIC Permit for the Lahaina, Maui, Hawaii Wastewater Reclamation Facility

Dear Ms. Rumrill:

Thank you for the opportunity to comment on the proposed revisions of the permit to inject wastewater from the Lahaina Wastewater Reclamation facility.

I speak on behalf of The Maui Nui Marine Resource Council (MNMRC), a broad-based community group which includes fishermen, scientists, Hawaiian cultural practitioners, business people and residents dedicated to the restoration of our nearshore waters and marine life.

As stated in our June 20 letter to you, we appreciate that the current permit proposal is an improvement over the original however; many of our requests have not been adequately addressed in this new draft and, in addition, we are aware of new information:

- There is a large body of evidence confirming that nutrients in coastal waters are a problem associated with the mismanagement of waste.
- According to statements made by current and former County Wastewater personnel (Dave Taylor and Alan Arakawa) at the November hearing, the nitrogen- laden effluent from the Lahaina wells does make it into the ocean.
- Coral reefs are a national and global resource and a large percentage of the U.S.'s coral reefs are in Hawaii. They are threatened by a wide range of factors, one of which is nutrient pollution. According to leading scientists, each factor needs to be addressed in order to stop the degradation.

- On September 22, testimony was presented to EPA by the Hawaii Division of Aquatic Resources Director Dan Polhemus citing a document attached to his testimony (Status of Maui's Coral Reefs, DAR & HCRI 2004) stating there is evidence of substantial reef degradation immediately offshore of the Lahaina facility; that they have years of data clearly showing a correlation between “wastewater injection, decreasing coral cover, and increased problems with invasive algae”; and there is scientific evidence “that the injection well plumes are percolating up into the nearshore waters where the reef is occurring...”.

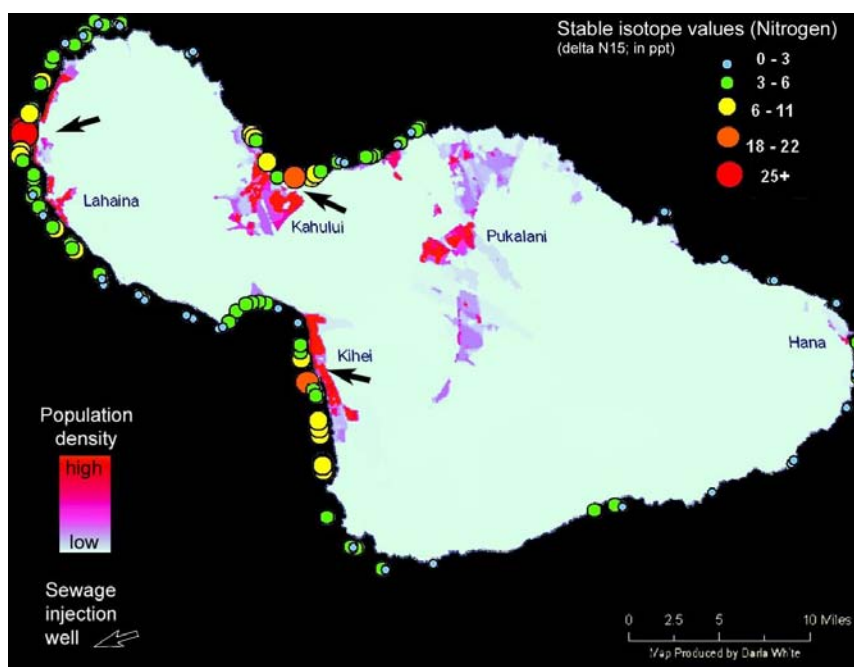


Figure 1. $\delta^{15}N$ Values Of Intertidal Macroalgae Identify Locations And Sources Of Nutrient Enrichment
M. Dailer, Dr. C. Smith, Botany Department, University of Hawaii, Honolulu, HI
(Coral Reefs of Maui, Status, Stressors and Suggestions)

- Habitat degradation is associated with few fish, and fishing for sustenance is a very important part of the Hawaiian/host culture.
- Healthy coral reefs are critically important to Maui's economy: West Maui reefs annually contribute tens of millions of dollars in added value to the economy (based on \$28 million added value for Kihei reefs primarily coming from property values and snorkeling and diving activities).
- Developing the infrastructure for higher levels of water reuse is economically justifiable: the costs of not doing so outweigh the costs of creating alternative methods of treatment and reclamation (K. Davidson, M. Hamnett and C. Minato (eds). 2003. The First Four Years: Hawaii Coral Reef Initiative Research Program 1998 – 2002).
- Very substantial progress has been made in other communities to address reuse issues.

- Using reclaimed water helps solve water shortage issues by helping to alleviate competing water uses.

Given this new and previously existing information, we stand by our earlier requests asking that:

- EPA address comprehensive watershed planning to ensure that this and all decisions/solutions are beneficial to all concerned; and,
- A time table should be established for the following:
 - Maui County meets all EPA Clean Water Act requirements
 - Deeper cuts are made to nitrogen loading as soon as possible
 - Groundwater, ocean water quality, and marine resource monitoring is implemented with resolution that can detect change over time from the mandated change in management to determine if the mandated changes are sufficient.

In addition:

- We support the Mayor's Goal of 100% wastewater reuse and ending all injection wells.
- We support substantially upgrading the treatment, reusing the water and shutting down the injection wells as the new water reuse system is built.
- We request a less than 10-year duration on the Lahaina UIC permit.

Sincerely,

Robin Newbold
Acting Chair