



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,

I write on behalf of the Maui Reef Fund to express our organization's point of view on the Environmental Protection Agency's proposed permit to allow 10 more years of wastewater injection into wells at the Lahaina treatment plant. The Maui Reef Fund is a concerned group of conservation-minded individuals, businesses and organizations actively working to protect Maui's coral reefs and fish population. See our web site at: www.mauireeffund.org

Marine tourism on Maui generates millions of dollars for Maui's economy and employs hundreds of people. Our livelihoods and the livelihoods of those we employ depend on giving our customers a great ocean experience. Thus, for us, abundant fish, healthy vibrant reefs, and sound and diverse ocean ecosystems are an economic as well as ecological imperative.

For these reasons we have banded together to take a variety of steps to protect the reefs and sensitize our passengers to the need to be good ocean stewards. These steps have included the mooring pin program we have set up and maintained, our marine tourism standards and educational program for our crews and our customers, promotion of artificial reefs, and ocean and reef cleanup work. In addition, the Maui Reef Fund seeks to raise public awareness about and concern for the well-being of the Island's coral reef ecosystems.

In the course of our strategic planning and prioritization efforts, we explored a range of potential and actual threats to the coral reefs and the health of our near shore waters. One of the threats to the reefs that we identified in the course of this work is the land-based pollution that enters the ocean, brings with it nutrients, and fuels algae

growth that can overtake and suffocate the reefs. These land-based sources of nitrogen and other nutrients and pollutants come from a variety of sources. Wastewater injection wells – both publicly and privately- owned are not the only threat to the reefs, but in our view the effluent from these wells, which we know is being released to the ocean is one significant contributing factor contributing to the serious reef declines we've witnessed first-hand over the last 15 years.

We were very pleased to learn that Mayor Tavares has voiced the goal of ending wastewater injection and achieving 100% wastewater reuse. The Maui Reef Fund strongly supports the Mayor's goal. We also support expeditious action to upgrade the County's water treatment facilities and processes, which in our view is essential both to ensure safe reuse of wastewater and reduce the pathogens going into the ocean. We believe Maui No Ka Oi is more than a slogan. It is the way we want our Island, our beaches, our reefs, and our ocean to be. We want our Island visitors as well as our crews to know that they can safely swim, snorkel, dive, and play in the ocean.

We believe the next step is for the county to develop a timetable, design and implementation plan for the necessary construction upgrades to the Lahaina and other wastewater treatment plants and for the environmentally sound transmission of the reclaimed and appropriately treated wastewater to the businesses and locations where they can safely be used on land.

We support the issuance of an underground injection permit only for an interim period until the Mayor's goal can be implemented not for the full ten years requested. We also support stringent limits on the nitrogen loadings that go into the wells and into the oceans. The sooner we can end injection wells safely and appropriately, the better for the environment and for the economy.

We appreciate the opportunity to present a business as well as environmental perspective in these comments. On Maui and for the Maui Reef Fund in particular, our environment truly is our economy.

Sincerely,

Victoria Martocci
Vice-chair