



June 20, 2009

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

RE: Request for Public Hearing on Revised Draft UIC Permit for the Lahaina, Maui, HI Wastewater Reclamation Facility

Dear Ms. Rumrill:

Thank you for the opportunity to request a public hearing and 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.

Members of MNMRC have worked with the DIRE coalition on Maui. DIRE proposals received unanimous support from the Council at our last meeting.

We appreciate that the current permit proposal is an improvement over the original, however many of the concerns expressed at the hearing have not been addressed. In addition, Mayor Tavares has recently expressed her commitment to zero wastewater injection. Thus we hereby request the following:

1. EPA participate in a forum that includes both drinking water and clean water act groups, and hold a public hearing on the permit after the forum has been held.
2. This open, interactive forum would include a representative group of concerned citizens, agency, and subject matter experts to explore how to meet the Mayor's stated goal and to develop a realistic plan and schedule for phasing out Maui County injection wells and transition to land-based reclamation and beneficial re-use of the wastewater.

3. Another EPA public hearing is held to address related marine environment concerns.

4. A time table is 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.

We appreciate your consideration of these requests which we believe will fulfill the EPA mandate to protect the waters and reefs of Maui County.

Sincerely,
Robin Newbold
Vice-chair