



West Maui Taxpayers Association

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WMTA is a non profit 501 c 4. WMTA, as a dedicated Lobbyist organization, has a mission for our West Maui Community. The objectives of this Organization are to associate the interests, concerns, and efforts of residents and taxpayers of the West Maui area, and others interested in the orderly development and improvement of the area, in a cooperative effort. whether provided by, or to be provided by, the State or County governments, or by others.

June 16, 2009

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

Fax to 1-415-947-3549
E-mail to: Rumrill.nancy@epa.gov

The West Maui Taxpayers Association (WMTA) appreciates the opportunity to comment on the EPA's proposed Lahaina Wastewater Reclamation Facility (LWRF) injection control permit. WMTA is a broad-based community association dedicated to improving West Maui through infrastructure investment, and has a long-standing interest in improving LWRF facilities.

WMTA understands there are no alternatives to injecting reclaimed water at this time, but urges the EPA to approve a new permit only if LWRF meets certain conditions. At a minimum, the conditions should require that LWRF immediately develop and implement a plan to shift from injection to greater reuse. This would include construction of a higher elevation storage facility and a distribution system capable of reusing a majority of the reclaimed water produced at LWRF.

WMTA also suggests that EPA require the plan to include long overdue efficiency upgrades to the LWRF facilities, and remedial measures to address the odor problems at both the Kaanapali and Honokawai facilities. These facilities are at the entrances to high value tourist areas that produce a significant percentage of the County's tax revenues. In these trying economic times it makes no sense to fail to remedy a situation where a tourist's first impression of the area is sewer odor. A definitive plan of action to address these issues is long overdue, and it makes sense to have a comprehensive plan to combine remedial actions for all the issues at LWRF.

Thank you for considering WMTA's comments on the permit. If you have any questions please feel free to contact WMTA at 808-280-9682 or 808-661-7990.

Sincerely,

Donald Lehman
President

Ezekiela Kalua
Executive Director

CC: The Honorable Mayor Charmaine Tavares, Maui County
Charvi Okuma