

I am commenting as a private citizen on the revised draft UIC permit for the Lahaina Wastewater Reclamation Facility (LWRF)(Permit # HI50710003). My formal training is in marine science and coastal zone management and I have spent the last two years managing a south Maui volunteer water quality monitoring program under the Hawaiian Islands Humpback Whale National Marine Sanctuary. The affects of injection wells on Maui's nearshore marine resources is becoming increasingly apparent and is scientifically documented. Biotic effects of these injection wells show up in unsightly algal blooms that exceed the capacity of already depleted grazing fish populations. The blooms smother coral and decrease the overall diversity of the nearshore marine environment and have a negative effect on our tourist based economy. Further, the lack of proper disinfecting procedures for injected water that leaches into our nearshore coastal waters is quite frankly unnerving and should be of an utmost concern to the county, community, EPA, and other government agencies that are legal stakeholders in Hawaii's nearshore water quality.

Despite intentions to improve reclamation and reuse ability of the LWRF it seems abundantly clear that the current revised proposal is inadequate. The 10 year time line needs to be reduced to a permitting timeline that is more in-line with the current threats that the injection well poses to our marine environment and human safety. Threats such as the direct introduction of non-disinfected bacterial laden effluent and high nitrogen loads into the coastal environment. **The permit should be reduced to 5 years or less with strict conditions towards creating and implementing a viable treatment or reuse alternative.**

The current proposal is unacceptable in allowing more volume of waste to be injected over a 10 year permitting period. The injected daily volume should be capped at its current level of 4-5mgd. The total nitrogen action level should also be capped at current levels(<7mg/l) with stated plans for implementing staged reductions for both the daily and monthly volumes and total nitrogen action levels.

The EPA and the county should not be supporting a permit that is looking to increase the capacity of a broken system that is harmful to the environment, the economy and the islands larger community of ocean users. Addressing this issue now is of the utmost importance and cannot wait ten years! Especially when west Maui is slated for continued growth. Please, despite current fiscal hardship, devote time, money and resources towards making our waste waters reclamation systems sustainable, because currently they are not! I further urge the EPA to strongly consider its legal enforcement obligation towards maintaining 'swimmable and fishable' waters in relation to the LWRF and to create permitting conditions that are in the best interest of the general public and the marine environment that we spend so much of our time in. Thank you all for your time and consideration on this important issue.

Sincerely,



Alastair Hebard