



August 20, 2009

Nancy Rumrill
U.S. Environmental Protection Agency
Ground Water Office (WTR-9)

Submitted via email: rumrill.nancy@epa.gov

Subject: Permit for the Lahaina Wastewater Reclamation Facility (LWRF)

Dear Ms. Rumrill:

In our letter of 22 June 2009, we asked the US Environmental Protection Agency (EPA) to hold a public hearing on the need and options for phasing out the Lahaina waste injection well, replacing it with an entirely non-polluting wastewater treatment system in order to protect coral reefs and provide other benefits.

While we were grateful to receive news that EPA would hold today's hearing, we were disappointed to see in the hearing notice that its purpose is to explain the current draft permit, which would allow continued groundwater and coastal pollution over the next 10 years. Our hope was that the EPA would focus this hearing on, and apply its expertise to, the "redirect-reuse" wastewater option.

Fortunately, Maui's DIRE Coalition has provided leadership by addressing the ecological, human health, economic, and legal aspects of this issue. We hope DIRE's testimony will help convince you to change course.

Today scientific authorities and progressive environmental agencies worldwide are calling for bold measures to save coral reef ecosystems. Regional and local threats, including nutrient pollution from wastewater injection wells, must be abated if we are to protect our coral reefs given increasing stress from higher sea temperatures, ocean acidification, and greater storm surge as a result of global heating. Surely these serious matters are known to EPA decision makers involved in this case.

Some 40 years ago, David Brower told writer John McPhee that he would do everything possible to get people back into balance with the environment, that they are way out of balance. "Our environment won't last, and we won't," said Brower. Given the course of history since, please do a little to help restore the balance by redrafting the LWRF permit in accordance with the recommendations of the DIRE Coalition.

EPA has a clear choice. You can allow substantial coastal pollution from Lahaina for 10 years under the current draft permit. Or, you can issue an alternative permit that both reduces pollution in the near term and ensures rapid transition to sustainable reuse of properly treated wastewater.

We appreciate this opportunity to comment.

Sincerely,

Tony Povilitis

Tony Povilitis, PhD

Director - Life Net Nature