Kaanapali Land Management Corp.

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Honoring our roots.
Preserving our spirit.

August 19, 2009

U.S. Environmental Protection Agency, Ground Water Office (WTR-9)
75 Hawthorne Street
San Francisco, CA 94105,
Attn: Nancy Rumrill
Transmitted via e-mail to rumrill.nancy@epa.gov

SUBJECT: DRAFT UNDERGROUND INJECTION CONTROL (UIC) PERMIT FOR THE LAHAINA WASTEWATER RECLAMATION FACILITY

Dear Ms. Rumrill:

I would like to submit testimony for consideration during the August 20, 2009 hearing in Lahaina for the subject UIC permit for the Lahaina Wastewater Reclamation Facility (LWRF).

There are two primary items to consider. The first is that Kaanapali Resort has one of the most beautiful beaches in the world. For the sake of recreational purposes for our Maui people as well as for the continued viability of the tourism industry in the region, we must ensure that prudent measures be taken in order to protect our reefs and beaches. It has been pointed out by some that the effluent water from the LWRF may contribute to algae blooms in the near shore waters due to high nitrogen levels. Even if it has not yet been scientifically proven that the injection wells do contribute to algae blooms, the importance of protecting the beaches and reefs should be at the top of the minds of our decision makers. Waiting for scientific studies to be done may be too costly in the end if there will be long term negative impacts to our beaches.

Another primary consideration should be that the reclaimed water can be used for irrigation purposes. May of the property owners in the resort including the residential subdivisions, hotels, timeshares, and condominiums have expressed interest in the use of R1 water. My company and others could also use the reclaimed water for the irrigation of ag lands. However the LWRF currently cannot produce enough of the R1 water due to its limitations of UV treatment and storage facilities. It really is a shame that this valuable resource is instead injected into the ground instead of being utilized in an environmentally sensible manner.

Ms. Rumrill, thank you very much for consideration of my testimony.

Very truly yours,

Howard Hanzawa, P.E.
Vice President