

Testimony to County of Hawaii Environmental Management Commission
March 24, 2021 Meeting

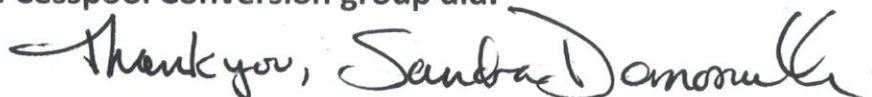
Aloha Chair Adams and Commission Members,

As a frequent harsh critic of consultant's reports, let me be the first to praise the utility of the reports commissioned by the State DOH Cesspool Conversion group, whose membership includes Director Mansour.

The recent cesspool conversion technology research reports have identified less costly wastewater treatment and disposal alternatives (see *e.g.*, attached *Upcountry Maui Cesspool Upgrade Analysis Table 10*. listing relative costs for 18+ alternative treatment plus disposal systems ranging from \$15,500 to \$54,550 per house).

I find this information helpful for reconsideration of options for the resolution of the two Ka'u AOCs for LCC closures. According to CWSRF records, the Ka'u projected cost would be \$441,260 for each home, based on the currently approved \$108,550,000 CWSRF loans for the 147 Naalehu and 99 Pahala homes covered in the two EPA 2017 Consent Orders. These tiny Ka'u communities have a low wastewater treatment priority because they are remote and far from the coast. All that is needed to satisfy the EPA AOCs immediately is to just install the ORIGINAL¹ cost-effective ONSITE LCC conversion to large-capacity septic tank treatment and disposal in the current seepage wells or absorption, like DEM did at the Pahala Senior Housing for \$413,000 in June 2018.

Therefore, given the opportunity for the production of a USEFUL Puna EIS that thoughtfully guides decision-makers -- (and even people like me who are powerless and just interested) --in consideration of the impacts and costs of multiple types of wastewater treatment and disposal alternatives -- I urge EMC to help seek a consultant up to the Puna EIS task like the Cesspool Conversion group did.

Thank you, Sandra Damour

¹ As admitted in *Federal Defendant's Answer to Plaintiff's Second Amended Complaint, Demoruelle v. Nishida*, CV 20-00147 LEK-RT, Doc. 73 Paragraph 65: "The original (2007 Final EA) Pahala project plan was environmental-review-exempt on-site septic conversion utilizing the current Underground Injection wells as seepage pits under a variance granted by DOH (April 2004 Docket No. 03-VWW-06)."