

From: [Georjean Adams](#)
To: [Wallace, Tiffany](#)
Subject: Fwd: Your draft priorities for 2025
Date: Thursday, January 23, 2025 1:14:51 PM

Please add to the testimony folder regarding Item V.2.

----- Forwarded message -----

From: **Stephen Holmes** <councilmemberholmes@icloud.com>
Date: Thu, Jan 23, 2025 at 12:47 PM
Subject: Your draft priorities for 2025
To: Georjean Adams <gadamsEMC@gmail.com>
Cc: Dr. Jim Beets <fishhawkhawaii@gmail.com>, Laura Laura Acasio <laura.acasio@gmail.com>, Chris Sparber P.E. <chris.sparber@hawaiicounty.gov>, Cory (Martha) Harden <333cory@gmail.com>, Chuck Flaherty <one@aloha.net>

Georjean:

In addition to the 3 AOCs, a settlement of Kealakehe was reported by Mayor Roth to be close and that will include the R-1 upgrade and water recycling infrastructure to end the illegal dumping. The settlement will be in Honolulu federal district court and will have a separate set of compliance deadlines. While no announcement has been made, this is not a winnable lawsuit for the County, so the EMC will need to add this to their priority list.

Alameda testified that the County will need around \$50 million just for this, but that number may be low as the Countywide AOC adds lots of new flows and may require expansion in addition to an R-1 upgrade. Another impact will be new federal regulations to address PFAS in water recycling. That may require the addition of granulated activated carbon to remove the PFAS.

Both Ulu Wini and Honokaa WWTPs also discharge to injection wells with no NPDES permits and are open targets for the next Citizen's Suit under the Clean Water Act. Chris Sparber reported to you regarding Safe Drinking Water Act permitting, but really didn't address the impacts of the U.S. Supreme Court decision on discharges of effluent to groundwater that conveys to regulated coastal waters. Again, the EMC needs to better understand what needs to be done and include them in the priority list. They really can't be ignored and are both candidates for water recycling. Ulu Wini received federal funds for replacing one of the two treatment trains, but no effort was made to get funding from CDBG to put in water recycling infrastructure to address the disposal issue. In Honokaa, the Countywide AOC mandates many more homes in Honokaa be connected, but the current plant was only designed for addressing gang cesspool closures under the Safe Drinking Water Act. It doesn't have the capacity for more homes and will need to be expanded. This wasn't specifically spelled out in the AOC, but is the practical consequence of adding all those unsewered homes. The Honokaa WWTP will need to get to R-1 and do water recycling as well. Fortunately an opportunity exists to blend it into the Lower Hamakua Ditch which serves agriculture in this area. This would provide drought proofing and avoid the need for pulling water out of the back of Waipio Valley 10 miles away. A win-win. Again, while not in a current AOC or under ongoing federal court action, the County cannot just ignore this situation.

The Countywide AOC does include financial planning and the establishment of a wastewater

enterprise fund like Honolulu has that stands apart from the General Fund. You can, however dedicate General Fund revenues, but once they go in, it is a one-way street. Bond investors need to see sufficient revenue to pay off bonds. The money can't be impacted by political changes after they put their money on the line. I appreciate the EMC including enterprise funding for both wastewater and solid waste to finally give these operations the sustainable funding they need. It is common practice around the country and meets GASB requirements. But the EMC needs to understand that the total price tag for just wastewater compliance is likely around \$1 billion and that sewer fee increases just aren't close to meeting the need. Mayor Alameda went to Honolulu recently and made a short presentation to the legislature, but they will need a detailed breakdown on all the compliance costs and need educating on the seriousness of the situation. No token responses.

Another priority in the Countywide AOC is to bring wastewater staffing up to minimum standards which will require more competitive salaries to attract and maintain qualified candidates as well as training and certification programs in conjunction with the local community college. I have already reached out to the UH Foundation officer at UH Hilo for grant support and federal funds are available. The County needs engineers badly as all that construction work starts to roll out the door. While some work for project management, putting together bid specs, environmental compliance, etc. can go to consulting engineering firms, County engineers still are required for oversight.

Another recommendation for prioritizing in 2025 should include an overhaul of the sewer improvement district process. Connections of homes in Service Areas that will have flows going to County facilities is now mandated under the Countywide AOC. The next tier of Service Areas are where homes will connect to existing private WWTPs to leverage that infrastructure and private capital. New legislation, however, is needed as private companies have no legal authority to acquire easements or mandate connections. This likely will require the legislature to establish this authority through something like a franchise approach rather than contracted services. The third tier are areas of high density where decentralized treatment is called for, but this raise a host of issues. The County simply doesn't have the bond capacity as it struggles just to meet AOCs. Puna is a good example of where private operators need to be invited in, but some type of legal authority established to facilitate this. The EMC can take the lead in pushing DEM to address this now. Every new homes going in with septic in this high rainfall area where leachfields just don't work is bad for the environment, but also will generate truckloads of septic waste which requires specialized septic handling equipment. Not just septic receiving equipment, but technology that addresses this concentrated waste that could harm the biological processing of the County plant. The current proposals for both Hilo and Kona don't address this. It deserves to be on the priority list as it isn't directly an AOC item but has to be addressed islandwide as more homes get off cesspools. As the AOC for Pretreatment goes into effect, so all those septic loads coming in will need to be lab tested. Those concentrated loads carry significant solids and add to our solids management crisis.

My thanks to you for your service and to incoming Commissioners coming in under these challenging circumstances.

Aloha,
Steve Holmes

--

Georjean Adams
Chair, Environmental Management Commission
gadamsEMC@gmail.com