

Bill 60 (2024)  
Testimony

Chairman Dos Santos,

Members of the City Council

Good Morning

My name is Frank Doyle, thank you for the opportunity to testify

Recently, ENV completed its Integrated Planning Feasibility Study, Final Report March 2025. This much needed and well-presented document recommends that ***“ENV pursue an integrated planning process. Integrated planning offers ENV the ability to: Revisit CWA obligations and schedules for both wastewater and storm water to rearrange projects that prioritize community defined objectives. ENV and SWQ can invest in projects that bring most impactful water quality and community welfare benefits sooner.”***

The 2021 Integrated Planning for Clean Water on Oahu document (CC051(25) stated ***“ Studies of the secondary treatment option concluded that there will be no benefit to secondary treatment upgrades for the environment or public health,2 and that other non-point sources of pollution are the main threats to water quality.” Further the plan concludes “The consent decree has interim deadlines (see Appendix 2) for design and construction milestones of the secondary treatment system. Time is needed to evaluate alternative options, and for the development of an Integrated Plan. To pause the consent decree timeline and evaluate other options, the original litigants of the Consent Decree and key players within the County government are needed to support the exploration of Integrated Planning. CCH can work with the EPA Ombudsman responsible for Integrated Planning to initiate the research and review process. An independent reviewer will then assess and assign value and impact indices to various options for improving coastal water quality, including remediation efforts like cesspool conversions, stormwater management, and sedimentation control. The Plan will provide the collaborative and comprehensive problem-solving process needed to most efficiently and effectively address Oahu's water quality issues.”***

Section 1.1 Federal Regulatory Background of the 2025 Integrated Planning Feasibility Study stated ***“EPA developed the Integrated Planning Framework to take advantage of existing flexibilities in the CWA to allow municipalities to prioritize investments to address the most critical water quality issues first. Using this framework, municipalities review all existing CWA requirements, capital improvement needs, and community objectives then reprioritize or conceptualize projects to maximize their investments to achieve greater water quality and human health benefits sooner. Although integrated planning allows for flexibility in the timing and order of investments, municipalities are still required to meet their CWA obligations.***

***The Water Infrastructure Improvement Act (WIIA) (HR 7279), codified integrated planning in a new section 402(s) in the CWA on January 14, 2019, providing greater certainty that municipalities may use integrated planning to meet CWA requirements.”***

**The last two sentences of the above paragraph need clarification as they may be subject to interpretation. On the one hand the first sentence could be interpreted to mean we must complete the requirements of the 2010 Consent Decree, as appears to be the present Administration’s position, while the second sentence provides for the use of integrated planning to meet CWA requirements.**

**Considering all the above, the effort of the City and County of Honolulu address these matters with the State and EPA should be given high priority,**

**in addition, it would appear prudent to suspend the ongoing design effort for Phase II secondary treatment at Sand Island to complete an Integrated Plan that may well recommend other projects of true benefit be pursued.**

**Respectfully submitted,**

**Frank J. Doyle P.E.**