

Mori, Ashley

From: [REDACTED]
Sent: Thursday, October 31, 2019 3:54 PM
To: General Plan; Planning Internet Mail
Subject: Comments on General Plan
Attachments: Charter Review.docx

Aloha,

Thank you for the opportunity to comment. I am happy to provide more details if necessary.

[REDACTED]

2019 NOV 1 AM 3 19
PLANNING DEPARTMENT
COUNTY OF HAWAII

129016

Thank you for the opportunity to submit comments regarding the 2040 draft general plan. My comments relate specifically to waste management issues and more generally to implementation of the plan.

I found many excellent provisions included and I am delighted to see the use of the term “resource recovery” as this should be the guiding principle for everything the county does to facilitate the handling of discarded items. The team that worked on this section is to be commended.

1) Waste reduction, resource reuse and recycling are maximized to achieve 50% diversion of recoverable materials from landfills.

A 50% diversion objective is far too low. Nothing less than an 80% goal is acceptable.

In the past, the county had already supplanted a missed goal of 50% by 2008 with a higher goal of 80% by 2013. Missing both these goals doesn't mean we need to rollback our ambitions; it means we need to take them more seriously and hold county administrators, most specifically the mayor, accountable for the failure to implement the policies codified in the general plan.

2) Develop and promote take-back programs for appliances and other difficult to dispose of materials.

This is one of the more important actions the county could take to reduce disposal of hazardous waste in our landfills and prevent products that contain them from entering our homes in the first place. Coupled with the call for extended producer responsibility, these programs will act as a reverse engineering process resulting in higher quality, longer lasting appliances, countering the current trend of planned obsolescence.

3) Composting at farms should be encouraged and facilitated.

Improving soil health is the most effective method for sequestering carbon at levels that will significantly reduce the impacts of climate change. Along with other provisions that support a small scale distributed system of organic resource recovery, this action is the single most important one the county can take to meet its GHG reduction goals.

4) Support expansions to the organic material (green waste) recycling program to include drop-off and pick-up locations at all rural transfer stations.

The use of the phrase “organic material (green waste)” causes unnecessary confusion. We should just stick with the term “green waste,” as “organic material” refers to so much more, including food waste, food contaminated service ware, paper and bioplastics.

5) Continue to evaluate the feasibility of waste to energy technology.

This item should be removed completely. If we are serious about our zero waste goals and committed to reducing single-use plastics, there will never be enough feedstock to support any WTE scheme. Taking the total carbon footprint of plastic into account (which is and always will be the preferred feedstock for WTE), renders these schemes completely incompatible with the county's stated climate change goals. Past evaluations of this sort at county expense have turned out to be a huge waste of resources and time. Codifying such activities in the general plan only encourages the county to waste taxpayer dollars that are better spent implementing our zero waste goals. Purveyors of these technologies will always have access to county officials and they will always be free to make sales pitches at their own expense, but to include this provision in the general plan is to justify further undue expense to taxpayers.

6) Promote opportunities for a circular economy.

This commendable goal precludes WTE technologies which, because they destroy precious natural resources, are nothing more than economic and environmental dead ends

9) Contract with, and or, make space available for cottage recycling operations in close proximity to transfer stations and County landfills.

This goal is extremely important if we are to reach our waste diversion goals.

*This subsection: **Source Separation Ordinance: Revise Section 20-43 to reflect resource recovery objectives and material separation rules.** . . includes a typographical error.*

10) Codify prohibition of organic material (green waste) disposal at the landfill.

This should just say "green waste."

11) Develop an E-Scrap ordinance: all electronic discards should be designated as reuse items which essentially bans anything with a plug from being landfilled.

This is one of the most important actions the county can take.

12) Codify County facility ordinance to require recycling at all County offices, facilities, and base yards.

This should read: "Codify a County facility ordinance to require County offices, facilities, and base yards to develop zero waste plans."

A zero waste plan would include provisions for recycling but, as we know, we are better off reducing and reusing to begin with, so it is not enough to require the county offices to recycle.

13) Conduct pilot studies to facilitate waste recovery and increase diversion rates. The following types of pilot programs are recommended. . . b) Partner/coordinate to facilitate the private use of large recycling roll-off bins in rural areas.

This should read: "Partner/coordinate to facilitate the private use of large recycling roll-off bins." Every private waste hauler should be allowed to deposit uncontaminated recyclable materials at the county recycling bins on behalf of their non-commercial clients, not just in rural areas.

My final comment has to do with implementation. I believe the county charter should create a provision whereby each mayor would be rated according to the effort she or he made to implement the provisions in the charter, so that this information can be made available to voters, prior to re-election.

Sincerely,

