Mori, Ashley

From: [redacted]
Sent: Wednesday, October 30, 2019 11:08 AM
To: General Plan; Planning Internet Mail
Subject: Comment on Draft County Plan

Aloha,

Thank you for the opportunity to review and offer comments on the draft County Plan. As a resident who is fully aware of the magnitude of our climate crisis, I'm especially concerned about our efforts to reduce emissions, create energy independence, and enable resiliency.

I have a few comments about a number of sections that refer to energy diversity. The following statement on pg. 81 (Strengthening Energy Diversity) Policy no. 270 it says: "Promote Biomass energy and fuel production using wood chips from exotic/invasive trees."

I think that this explicitly calls out support of an energy production strategy that is not consistent with our need for emission-free and renewable energy. This statement suggests support for a controversial project – Hu Honua (aka Honua Ola). It's been documented in the news how social media how this project will not satisfy our need for emission free energy. It is also one that will introduce risks to the health and well-being of our communities on the Big Island – from the many diesel trucks that will ply HWY 19 from Kau and Hamakua, to the emissions from the plant, to the impact to ground water, cliffs, and ocean life. The power generated will be twice the cost of solar and the level of emissions will be comparable or worse than burning coals. It's no wonder that many environmental groups and residents have protested the project.

From an environmental perspective, this project will not only generate more emissions (from cutting, transport, and burning of trees), it is will result in the removal of an important carbon sink (the 20,000 plus acres of trees that it plans to burn).

The general plan should lay a foundation for what will be, among other things, our clean energy future. This should call out a strategy to more aggressively deploy solar, wind, hydro, and even geothermal. Explicitly calling out 'fuel production using wood chips…' runs counter to our efforts to address our climate crisis and our recent Climate Emergency Declaration. Biomass energy (as it is currently being attempted by Hu Honua / Honua Ola) also runs counter to the Hamakua Community Development Plan.

The following are relevant points that have been circulated by local environmental groups. These points summarize many of the concerns raised in the media, in public testimonies, and in protests.

ENERGY IMPACT

Biomass Energy (as is currently being demonstrated by Hu Honua / Honua Ola) is NOT cost effective and WOULD increase energy costs for ALL consumers. The $.22 PER KWH cost, demonstrated in the purchase agreement with Hawaii Electric is TWICE the cost of SOLAR and also SIGNIFICANTLY higher than Solar WITH Storage. Huge Solar farms with battery storage, totaling 60MW, near Kamuela will come online by 2022 and will sell power to HELCO at 11c per KWh. Hu Honua will sell power to HELCO at 22c per KWh.

EMISSION IMPACT

Burning wood emits 1.5x more greenhouse gasses than burning COAL in producing equivalent electricity (per KWH). (IPCC Taskforce on Greenhouse Gas Inventories (2006) and Laganiere et al. (2017))

Burning Wood emits 3x more greenhouse gasses than burning natural gas and approximately 2x more GHG than burning naptha (the fuel for Big Island's largest electricity plant). (IPCC Taskforce & Laganiere (as above)

Hu Honua will burn close to 20,000 acres of Eucalyptus plantation trees at a time when the IPCC tells us that the most important thing we can do to mitigate the impending catastrophe of Climate Change is plant more trees in order to sequester greenhouse gasses.

Hu Honua / Honua Ola will emit 300,000 TONS of greenhouse gasses per year. This is more than 1,000 tons of GHG per day. (Hu Honua Clean Air Permit Application - Greenhouse Gas Addendum)

Honua Ola / Hu Honua would use 400,000 to 450,000 gallons of diesel a year (1,100 to 1,235 gallons per day) to harvest, transport, process, trees and remove waste. That amounts to approximately another 10,000,000 pounds of CO2 per year.

ON CARBON NEUTRAILITY CLAIMS

A Government of Canada computational tool shows the cumulative greenhouse gas emissions from cutting, burning and regrowing trees to be worse than burning coal until at least 50 years after the initial harvest (factoring in the transport distance from Waiakea, Pahala and Hamakua Eucalyptus plantations and modeling rapidly growing Canadian trees, though understanding that the Big Island trees grow more rapidly.) This is 'best case' scenario, 50 years to achieve parity with coal. More likely, accumulation of GHG from burning wood would be worse than burning coal indefinitely. See: < bioenergy greenhouse gas calculator > https://apps-scf-cfs.rncan.gc.ca/calc/en/bioenergy-calculator

The EPA attempted to declare bioenergy to be "greenhouse gas neutral". The EPA then requested endorsement of this policy twice from its Science Advisory Board (SAB), in 2014 and again in 2017. On both occasions the SAB refused endorsement.

Hu Honua's prospective fuel-source trees have been growing for over 20 years. Their harvest cycle will be every 7 years. This offers no chance to even approach carbon neutrality. It's important to note that Kamehameha Schools, owner of the Hu Honua fuel-source trees, has indicated that the first 3,000 acres of trees harvested will not be regrown in deference to 'other uses'. Again, this makes carbon neutrality and 'green energy' a moot talking point. Thus, the sustainability of biomass/fuel electrical generation is uncertain.

PUBLIC SAFTEY IMPACT

Hu Honua's hydrogeology modeling states the transit of discharge water through the Hakalau aquifer from the injection wells to the ocean will take, on average, 50 days. At 21 million gallons per day, that means that there will be 1 billion gallons (15,000 olympic swimming pools) of heated, contaminated water in the aquifer at steady state, with concern for contamination of the drinking water wells. This realization may have triggered the Department of Water Supply's demands reflected in their letters.

Transportation and safety impacts from Biomass Energy - (demonstrated by Hu Honua / Honua Ola), which will send 5 to 6 logging trucks per hour down Highway 19 from Hamakua to Pepeekeo and from Pahala and Waiakea to Pepeekeo, one truck every 10 to 12 minutes.

Further, the State DOT and Hawaii County have completely failed to address the very real hazards and traffic dangers that would be created by the HH . HO project if approved. The State DOT. and county have been called upon to account for this failure numerous times by my fellow concerned Hamakua neighbor, Donald Rudny.

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Hilo, Hawaii

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