

Mori, Ashley

From: [REDACTED]
Sent: Thursday, October 10, 2019 5:42 PM
To: General Plan
Subject: comments regarding wildlife

Aloha,

Thank you for preparing this General Plan update. It contains lots of great information and plans for the future.

Needs Attention to Wildlife

In general, it seems very light in recognition of the threats to and needs of native wildlife. In the natural resources sections there is discussion of protecting and restoring certain types of ecosystems or habitats, and discussion regarding controlling invasive species. These will be instrumental for native wildlife conservation too, of course. However, I see no mention of evaluating, identifying, protecting, restoring, etc. habitat specifically for the purpose of wildlife conservation. Nor do I see any language regarding how development should proceed in order to minimize impacts to native wildlife. I would suggest that you take another look at native wildlife considerations and how they should be incorporated and addressed within this General Plan. In particular, each native species currently at risk should be addressed specifically, with specific objectives and actions identified for their conservation.

Renewable Energy Balance with Wildlife Needs

There are lots of good goals, objectives, and actions identified regarding GHGs and the intention to convert to "renewable energy" sources as much as possible. This is admirable, but I'm alarmed at the lack of any language to qualify these plans so that they are implemented in balance with native wildlife needs (and other environmental and human considerations). The General Plan should contain very clear policies and ACTIONS regarding siting and operating renewable energy projects (and all development projects) to minimize impacts to native wildlife. The Action statements should be very specific since policy statements, goals, and objectives are easily disregarded due to lack of specificity, especially when there is money to be made.

Wind Energy Impacts to Bats and Birds

For example, the wind energy industry is well known for causing high levels of mortality for birds and Hawaii's only native land mammal, the endangered Hawaiian hoary bat. Even across the mainland where the hoary bat is not listed as threatened or endangered, it is predicted with high probability of going extinct within 50 years as result of wind energy impacts (Frick et al 2017), and substantial population declines have been documented in the pacific northwest as a result of wind energy impacts (Rodhouse et al 2019). In regard to wind energy impacts to bats, some clear and simple Actions articulating the County's expectation that all wind farms be sited in areas with low suitability for and detection of hoary bats, and operated from day one using cut-in speeds that are higher than wind speeds in which hoary bats typically fly. These types of Action statements would streamline planning and approval processes, reduce planning and approval costs, attract suitable wind energy projects and companies, and protect Hawaii's native wildlife. I'd suggest that you solicit input from the USGS biologists in Volcano studying the hoary bat and sensitive bird species that are heavily impacted by the wind industry to help you craft meaningful language regarding wind energy development. This would help avoid the excessive bat mortality that Oahu is experiencing right now. Wind energy may be renewable, but Hawaii's wildlife is not unless they are afforded the protections they need for their populations to persist.

Don't Rely on Others to Protect the County's Resources

The General Plan includes an action to develop HCPs. HCPs can be useful. However, HCPs can be extremely long and expensive to develop, and the County should not rely on other agencies and mechanisms to protect the County's resources when the County can do so more simply, cheaply, and effectively by including clear Actions designed for conserving native wildlife in this General Plan.

Mahalo for conscientiously preparing this General Plan and considering my comments.

