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From: [REDACTED]
Sent: Tuesday, October 29, 2019 5:28 PM
To: General Plan; Planning Internet Mail
Subject: Comments on General Plan

PLANNING DEPARTMENT
COUNTY OF HAWAII
2019 OCT 30 PM 8:39

Aloha,

Thank you for accepting and including my comments below in your County Plan Draft Review and amendments.

The following, (quoted below) 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."

This quote needs to be totally deleted / eliminated from the County Plan, (NOT EDITED) for the following reasons:

* State and County governments' **duty and responsibility** is to serve and protect the public's health, safety and public trusts - **NOT to "PROMOTE"** a specific business or industry, and **Not to "Promote" the private-profit seeking ventures of private businesses, industries, and investors.**

* Biomass Energy (as it is currently being attempted by Hu Honua / Honua Ola) is not consistent **with the Hamakua Community Development Plan.**

* Biomass Energy (as it is currently being attempted by Hu Honua / Honua Ola) is not consistent **with Hawaii County's Declaration of Climate Emergency.**

* Biomass Energy (as is currently being demonstrated by Hu Honua / Honua Ola) is **not cost effective and will 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. (That purchase agreement and the PUC's handling of it are currently being litigated.) (See additional comment regarding costs below)

* **It has been demonstrated and proven that Biomass Energy (as it is currently being attempted by Hu Honua / Honua Ola) is extremely inferior to other forms of energy:**

Hu Honua has promoted itself as "Clean Energy" HOWEVER:

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.

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 Laganieri 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 & Laganieri (as above))

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)

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.**

Further Extrapolating this example - Kamehameha Schools, owner of the HH / HO 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 NOT CERTAIN.**

* 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 - which are STILL UNANSWERED!

* Biomass Energy (as it is currently being attempted by Hu Honua) would create threats to human health and safety (that the State and County have neglected) directly related to both drinking water protection AND transportation and public safety

* 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.

Honua Ola / Hu Honua would use **400,000 to 450,000 gallons of diesel a year (1100 to 1235 gallons per day) to harvest, transport, process, trees and remove waste. That amounts to approximately another TEN MILLION POUNDS of CO2 per year.**

* 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.

* 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**.

* The state and county governments and the respective agencies (and the PUC) have failed miserably in their responsibility to gather accurate data and facts regarding Biomass Energy (as it is currently being attempted by Hu Honua) and have thus made extremely grave errors in their agency duties, hearings, determinations, decisions, and permitting processes. Hawaii County should NOT be blindly "PROMOTING" this polluting, expensive, unsustainable form of energy when the county has not demonstrated the ability to make sound, responsible decisions that represent the economic, public health, and environmental future that Hawaii County RESIDENTS demand.

* This language "Promote Biomass energy and fuel production using wood chips from exotic/invasive trees" appears to me, and likely many - to be the result of the influence from private, for-profit, special interest - in our county government - and as such, it should be immediately removed. Further, I believe that I / we deserve an explanation of how and why that statement came to be included in the County Plan Draft.

* This proposed statement is disrespectful and insulting to the hundreds of us - community members who have consistently asked our state and local governments and agencies to DO THEIR JOB, to protect the public trust, our health, safety, environment, and our quality of life, and us - who have worked to protect the economic and environmental well being of our island and our communities FROM the very Biomass Energy which this draft proposes "PROMOTING". It is beyond UNACCEPTABLE!!

On a final, more personal note: I, like many of my neighbors and fellow islanders, can see, hear, smell, (and ultimately BREATHE) the highway from my Honokaa home. Many who live closer to the currently proposed Biomass Energy facility that is Hu Honua / Honua Ola are finding their community, their air, water, safety, and lives even more threatened by this polluting industry that your draft seeks to "PROMOTE".

I / we should NOT have to battle my / our own state and county governments and agencies in order to protect my (our) AIR, WATER, NEIGHBORHOOD, Quality of life, and economic and environmental justice. Your salaries are paid from my (our) taxes to protect these things, our public trusts - NOT TO "PROMOTE" Hu Honua / Honua Ola or anything other profiteering, private-interest, business or industry that directly diminishes these public trusts!!

Mahalo, [REDACTED]
Papaikou