

From: [Dan and Shannon Fisher](#)
To: [LPCtestimony](#)
Subject: reschedule County Counsel meetings regarding the General Plan, Jan 2025
Date: Thursday, December 19, 2024 9:30:03 AM

Aloha,

We are contacting you in regards to the cancelled General Plan meetings for January, 2025. We need more of these meetings to hear the testimonies of the people of the Big Island as well as why such changes are being implemented by our county.

These changes proposed are not only unnecessary but dangerous for the future of our Ohana and our well being. We believe it is the job of the County Counsel to notify every resident of such life changing plans. The people of Hawaii require full disclosure on what the County Counsel is doing.

--

Dan and Shannon Fisher
808-345-4449

From: [Planning General Plan](#)
To: [LPCtestimony](#); [WPCtestimony](#)
Subject: FW: General Plan Draft Land Use Designation
Date: Thursday, December 19, 2024 12:35:05 PM

Public Comment

From: Dan Berg <dan.berg@dlbandassoc.com>
Sent: Thursday, December 19, 2024 12:02 PM
To: Planning General Plan <generalplan@hawaiiicounty.gov>
Subject: General Plan Draft Land Use Designation

Regarding General Plan Draft affecting Tax Map Key (3) 2-1-006-023

We are having difficulty with the General Plan website portal. Attempting to comment but the site is in a redundant loop.

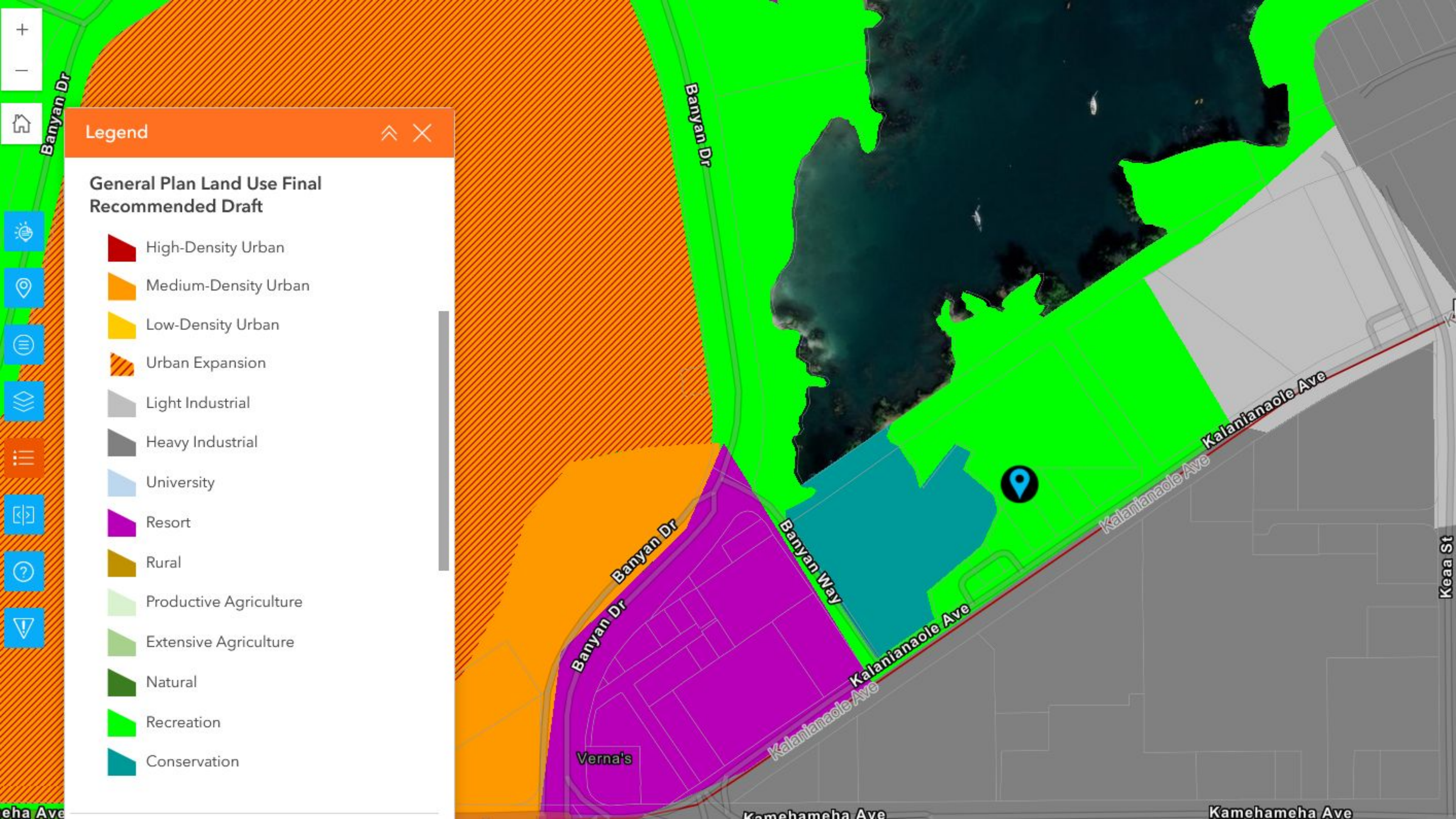
Please insert into the public comments the following statement:

As owners of the above property we are concerned with the proposed designation of the property as Recreation on the General Plan. The current GP Draft includes these properties incorporated into Reeds Park.

While we understand this does not immediately change the Land Use Zone from current V-0.75, it is the first step to facilitate such a change via an emanate domain process.

We have plans to develop our parcel for residential use and do not want to be compelled to negotiate appraisals, purchase and develop another property.

Dan Berg
966-4206
<https://dlbandassoc.com/>



From: [Davina](#)
To: [WPCtestimony](#)
Cc: [LPCtestimony](#)
Subject: GP public testimony meetings
Date: Thursday, December 19, 2024 3:34:24 PM

By Aloha,

By this email, I am asking that you **reschedule the GP public testimony meetings in January.**

Many of us seek to speak and be heard at these important meetings in first month if 2025.

With Aloha & Gratitude,
Davina Mar

Live Aloha Love Now

From: [Dawn Singleton](#)
To: [LPCtestimony](#); [WPCtestimony](#)
Subject: Testimony December 19th at five
Date: Thursday, December 19, 2024 2:59:36 PM

STOP GP from going to the County Council until further investigation is done...

- "Climate Change" the foundation of the **entire plan**
- Turning private land into recreation, **dropping property value**, and the right of the State to do so. (No local would want that.)
- The **Safety** of electric vehicles on the island, the problem with recycling the lithium batteries, which are hazardous **waste**, and the increased expense to locals electricity bills! (The current electric grid **can't handle more!**)
- Taking **most of the island** and giving it to the State under the guise of "Conservation", "Natural," and "Rural."

Thank-you

Dawn Eshelman Singleton, PhD, DHS, CTP, DNM

'Board Certified'

Quantum Biofeedback Specialist & Author

"FEEL BETTER THE NATURAL WAY"

www.quantumhealthhawaii.com



From: [Dawn Singleton](#)
To: [WPCtestimony](#); [LPCtestimony](#)
Cc: [Dawn Singleton](#)
Subject: Revise Hawaii General Plan Testimony
Date: Thursday, December 19, 2024 2:53:43 PM

Aloha Commissioners,

The Big Island Plan cannot be implemented as designed. It is hard to believe that any locals helped create this plan.

Here are some concerns:

A considerable part of the plan is dedicated to "Climate Change". However, why do most experts state there is NO climate danger? [Climate Experts Speak Out Against Climate Danger Click Here!](#)

The word "Stakeholder," defined in the plan, is written 86 times and literally means anyone in the world can have input on this plan.

Please recommend Stakeholder change to the following: "Local Communities". Local Communities are local Big Island farmers, homeowners, renters, organizations, businesses, and individuals who live on Big Island or have property on Big Island that will be personally affected by projects, decisions, or activities in the general plan. Effective local community engagement and management are crucial for the success and sustainability of any initiative, as it helps ensure that diverse perspectives and interests are considered.

The OSCER Department in the plan will null and void all public input and leave decisions to unelected officials. This is NOT okay! This department should not be created. This is on page 188, 40.8.

The Planning Department has sent out letters too many homeowners telling them their land use will be changed from resident to recreation due to the General Plan 2045. This will drastically lower their property value and opens the door to rezone the area. This is not pono. It breaks the Aloha Spirit law § 5-7.5. To reduce someone's property value is not okay. This must be made pono again.

There is a huge section on climate change and things that will be affected. This needs to be further researched. There are over 1900 credentialed scientist that say there is no climate danger. Here is the pdf showing the scientist and what country they are from. <https://clintel.org/wp-content/uploads/2024/10/WCD-241023.pdf> John Coleman, the first weatherman for Good Morning America and the Founder of the Weather Channel, has gone on CNN and other media outlets, stating, "There is no climate danger". He explains the reason for this narrative is the investors in renewable energy want to make these changes.

Hilo does not have a Community Development Plan. How can a Big Island General Plan move forward without that? Hilo is 22% of the island.

1.13 under "Increase the biodiversity and resilience of native habitats" reads, "*Incentivize private land management practices that protect and enhance natural resource values and, when appropriate, pursue the acquisition of lands for the protection of natural resources.*" "Incentives" mean more taxes. "Protection" means more rules. Who's "values" is this plan referring too because it's not the locals? "Pursue the acquisition of lands." Does this say they are going to take people's private property? Again with "protection of natural resources". This plan should be focused on people growing more food and it is doing the exact opposite! This plan wants to turn land into "conservation". The exact opposite is what is needed for Big Island! We need to turn land into Ag Villages and grow more food! Steve Shropshire, a resident of Papaikou, has created an Ag Villages plan.

Ag Village to add to the General Plan:

Papaikou Ag Village Objectives:

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Papaikou Site

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https://www.standtogetherhawaii.com/_files/ugd/86fc0c_c2af52c8b3c645b1a6868a724eee8304.pdf

A Hawaiian born Kanaka revised the Collaborative Biocultural Stewardship that is in the plan. You can see it in the pdf [below](#):

Part

One: https://www.standtogetherhawaii.com/_files/ugd/86fc0c_0a1d5be8f1d140069415f7b691725786.pdf

Part Two: [https://86fc0cb4-8207-4076-85fa-](https://86fc0cb4-8207-4076-85fa-5a62e4e933b4.usrfiles.com/ugd/86fc0c_ecc498ba192d4a7689ebf31c3681c2ec.pdf)

[5a62e4e933b4.usrfiles.com/ugd/86fc0c_ecc498ba192d4a7689ebf31c3681c2ec.pdf](https://86fc0cb4-8207-4076-85fa-5a62e4e933b4.usrfiles.com/ugd/86fc0c_ecc498ba192d4a7689ebf31c3681c2ec.pdf)

Here is a longer revised version of the plan from locals:

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Thank-you

Dawn

Dawn Eshelman Singleton, PhD, DHS, CTP, DNM

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From: [donna zacharski](#)
To: [LPCtestimony](#)
Subject: Reschedule January
Date: Thursday, December 19, 2024 8:23:40 AM

To whom it may concern,

Why are the Big Island General Plan (GP) 2045 public testimony meetings for January cancelled . This is NOT okay! The people have a right to be heard. Please reschedule the public testimony meetings for people to be heard. We are on this earth for such a short time. Why make life difficult for people. Doesn't get you anywhere. We all end up in the same place. Think about that. Merry Christmas

[Sent from Yahoo Mail for iPad](#)

From: [Doctor Jack](#)
To: [LPCtestimony](#)
Subject: Reschedule GP Meeting in January
Date: Thursday, December 19, 2024 10:42:23 AM

Thankyou,

Jack Ebner

From: [Ken Honma](#)
To: [WPCtestimony](#); [LPCtestimony](#); [Stand Together Hawaii](#)
Subject: Reschedule the January General Plan public testimony
Date: Thursday, December 19, 2024 12:53:33 PM

Public testimony for the general plan needs to be rescheduled for January . I just found out that the scheduled public testimony has been cancelled, this is a breach of trust. The general plan 2045 is very important and at this point needs more input from the people of this county, so reschedule the public hearing so that we can be heard.

Sincerely,

Ken Honma

Kurtistown Hi. 96760

From: [Lahilahi Heen](#)
To: [LPCtestimony](#)
Subject: Hawai'i General Plan Meeting
Date: Thursday, December 19, 2024 10:17:04 PM

Regarding the meetings that are cancelled in January for the Gen Plan, this is NOT okay. The message with this action is Communistic. A nefarious plan is taking place and you all don't want to be disturbed. If this is not the case, then set new dates in January and pay attention to the people you are expected to serve, not the people who manipulate to serve them.

P. O.

From: [Michelle Melendez](#)
To: [LPCtestimony](#); [WPCtestimony](#)
Subject: We appreciate you (apology here)
Date: Friday, December 20, 2024 2:26:58 PM

Aloha Commissioners,

I want to apologize for my intensity during testimony. It's not personal or an attack on any of you. I really appreciate you and your time. I know you're volunteers.

My intensity is due to this plan and my huge concern of the possibilities that it will move forward.

There was a commissioner that asked what would happen if it didn't go through, which it should not. Mahalo for the question. This plan should not be rushed just because it's over the time limit when it should have been adopted. If it will harm the island and the people here, which it will, it must be recommended that it not go through. I pray that you do that.

The general plan manager said they took input from locals to create this plan. I don't know one local that would want a plan like this, and not one has shown up to speak on behalf of the plan in the 10 meetings I've attended.

She also stated the source for climate change is from the "authority of the State". The State is not an expert on weather. The State and the electric companies will prosper if this plan goes through, not the people. If they are the source for the foundation of a plan where they prosper, that is a conflict of interest.

I want to say a big mahalo to the commissioner who asked for them to talk about the Hawaii land trusts in the plan. That was a wonderful request. I haven't seen any info on it so I'm curious to hear what they say.

I know that you are all volunteers and I cannot express how much I really do appreciate you and your time. I'm very sorry if my intensity has come across as an attack. That was never my intention. Without you, this plan goes through to people who are paid and may not have the public's best interest at heart. You do, and I really appreciate that.

Have a wonderful holiday.

Mele Kalikimaka,
Michelle Melendez-Freedom Activist
Fitness and Wellness Expert Since 1996
Author Of The Best Selling and 4x Award Winning Book,
End Dieting Hell: How to find peace in your body and release the weight
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"Great Maui Land Grab" NOW [Available here](#)

From: [Seraph D"Alerta](#)
To: [WPCTestimony](#)
Cc: [LPCtestimony](#)
Subject: Revise Hawaii general plan testimony
Date: Thursday, December 19, 2024 8:34:52 AM

Aloha Commissioners,

The Big island Plan cannot go through the way it is designed. It is hard to believe any local helped design this plan.

Here are some concerns:

There is a huge part of the plan dedicated to "Climate Change". However, why do most experts state there is NO climate danger? [Climate Experts Speak Out Against Climate Danger Click Here!](#)

The word "Stakeholder," defined in the plan, is written 86 times and literally means anyone in the entire world can have input on this plan.

Please recommend Stakeholder change to the following: "Local Communities". Local Communities are local Big Island farmers, homeowners, renters, organizations, businesses, and individuals who live on Big Island or have property on Big Island that will be personally affected by projects, decisions, or activities in the general plan. Effective local community engagement and management are crucial for the success and sustainability of any initiative, as it helps ensure that diverse perspectives and interests are considered.

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The way this plan is written is very far from what will support our island.

Aloha

Seraph D'Alerta

From: [Sloan Brockman](#)
To: [WPCTestimony](#)
Cc: [LPCtestimony](#)
Subject: Revise Hawaii general plan testimony
Date: Thursday, December 19, 2024 8:33:01 AM

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Aloha

Sloan

From: [Michelle Melendez](#)
To: [LPCtestimony](#); [WPCtestimony](#)
Subject: My verbal Testimony in written form (mahalo)
Date: Saturday, December 21, 2024 2:42:31 PM

Aloha Commissions,

Here is my written testimony of my verbal testimony:

I believe this is my tenth time speaking at these meetings about the GP and have yet to see one local in support of this plan. Yet, we're meant to believe locals helped create this plan.

This plan has so many things that indicate the State, and electric companies are the ones who will prosper, not locals and not our future keiki.

We were told the land for Conservation is already State land. Yet, land allocated for Conservation runs nearly the entire coast of Big Island. There are private land owners who own coast land so that cannot be true that all current Conservation land is owned by the State.

Where are Hawaiian Homelands in this plan?

When I do a word search I get "not found".

What I'm concerned with most:

- Land that will be "acquired" for Conservation, Natural, and Rural land. It even says that they'll "lease" it back to the farmer. This land should be used to grow more food, not be taken away from people and conserved.

The wording of the plan is confusing:

- For example: "Immediate steps shall be taken to designate treatment plant sites, sewerage pump station sites, and sewer easements according to the facility plans to facilitate their acquisition." pg. 137 (27.3) Does this mean they want to immediately acquire people's land for sewage sites?
- It shows that it wants to move people into clustered housing. Page 10 ***Cluster Plan Development (CPD)*** refers to a land use planning strategy where residential or commercial development is concentrated in specific areas while preserving larger portions of the land as open space or natural areas. In this

approach, buildings are grouped closely together, often in a compact or clustered manner, rather than being evenly dispersed across a site. This will not benefit Big Island people and should be removed.

- Electric cars are extremely dangerous and are a hazard waste that we cannot put in our landfills. A commission asked what if we just have EVs for the government and not public and another commission said we must have zero emissions. Why? Whose policy is that? Why can't it just be for the State? People do not want electric vehicles. They are a hazard waste that we cannot put in or landfills so what will we do with them when they die?
- **VERY Concerning: Page 11: "Crime Prevention Through Environmental Design (CPTED)** is a multidisciplinary approach of crime prevention that uses urban and architectural design and the management of built and natural environments." This sounds like Big Brother and surveillance. What does this mean? This looks like the creation of a **police State**.

Please motion to **stop this plan from moving forward**. Big Island will never be the same. It will not support Hawaiians coming back to live here. It will do the exact opposite.

Please reschedule both January meetings for testimony on the GP. More people will want to be heard and this plan is the foundation for the future of Big Island. All meetings should be honored.

Mahalo nui loa for your time. I know you are volunteers and we really do appreciate you.

Aloha,
Michelle Melendez
Fitness and Wellness Expert Since 1996
Author Of The Best Selling and 4x Award Winning Book,
End Dieting Hell: How to find peace in your body and release the weight
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"Great Maui Land Grab" NOW [Available here](#)

On Fri, Dec 20, 2024 at 2:25 PM Michelle Melendez <michelle@blossominnerwellness.com> wrote:

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Have a wonderful holiday.

Mele Kalikimaka,

Michelle Melendez-Freedom Activist

Fitness and Wellness Expert Since 1996

Author Of The Best Selling and 4x Award Winning Book,

End Dieting Hell: How to find peace in your body and release the weight

Order your copy of [End Dieting Hell Click Here](#)

"Great Maui Land Grab" NOW [Available here](#)

From: alicia.palmvalleyfarm.com
To: [LPCtestimony](#); [WPCtestimony](#)
Subject: Revise Hawaii General Plan Testimony or postpone until a Hilo CDP may be established.
Date: Sunday, December 22, 2024 1:00:32 AM

After several meetings with the community members we would like to see changes made to the proposed General Plan.

Here are some concerns:

- 1. The plan defines " Stakeholder " 86 times, which means anyone in the world can have input on this plan.
- Please recommend Stakeholder change to the following: "Local Communities". Local Communities are local Big Island farmers, homeowners, renters, organizations, businesses, and individuals who live on Big Island or have property on Big Island that will be personally affected by projects, decisions, or activities in the general plan. Effective local community engagement and management are crucial for the success and sustainability of any initiative, as it helps ensure that diverse perspectives and interests are considered.
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- 7. This plan wants to turn land into "conservation". The exact opposite is what is needed for Big Island! We need to turn land into Ag Villages and grow more food! Steve Shropshire, a resident of Papaikou, has created an Ag Villages plan.

Ag Village to add to the General Plan:

Papaikou Ag Village Objectives:

https://www.standtogetherhawaii.com/_files/ugd/86fc0c_2cb1cc6d604f4cdd971ad40831c745bc.pdf

Papaikou Site Plan:

https://www.standtogetherhawaii.com/_files/ugd/86fc0c_5e4cdb02efeb46a5ae949a3579aff00d.pdf

Papaikou Development:

https://www.standtogetherhawaii.com/_files/ugd/86fc0c_c2af52c8b3c645b1a6868a724eee8304.pdf

A Hawaiian born Kanaka revised the Collaborative Biocultural Stewardship that is in the plan. You can see it in the pdf [below](#):

Part

One: https://www.standtogetherhawaii.com/_files/ugd/86fc0c_0a1d5be8f1d140069415f7b691725786.pdf

Part Two: [https://86fc0cbd-8207-4076-85fa-](https://86fc0cbd-8207-4076-85fa-5a62e4e933b4.usrfiles.com/ugd/86fc0c_ecc498ba192d4a7689ebf31c3681c2ec.pdf)

[5a62e4e933b4.usrfiles.com/ugd/86fc0c_ecc498ba192d4a7689ebf31c3681c2ec.pdf](https://86fc0cbd-8207-4076-85fa-5a62e4e933b4.usrfiles.com/ugd/86fc0c_ecc498ba192d4a7689ebf31c3681c2ec.pdf)

Here is a longer revised version of the plan from locals:

https://www.standtogetherhawaii.com/_files/ugd/86fc0c_b34739e4c99c461685de4c0207bf286e.pdf

The way this plan is written is very far from what will support our island. It is also a Constitutional right for us to travel. Limiting the amount of miles driven should not be considered in the General Plan. Preferably, we would like to see this plan addressed and rewritten after establishing a new CDP. There is no reason to rush this plan given the amount of concerns our community would like to further investigate. We are able to continue with the 2005 plan until a satisfactory plan is rewritten.

Mahalo,

Alicia Wills
Palm Valley Farm LLC
Land Owner

From: [Oda, Michelle](#)
To: [Planning General Plan](#); [WPCtestimony](#); [LPCtestimony](#)
Subject: FW: Reschedule General Plan 2045 Meetings in January 2025
Date: Monday, December 23, 2024 11:35:02 AM
Attachments: [image001.png](#)

Hi,

Forwarding email for your attention and use.

Thank you,
Michelle Oda

County of Hawaii, Planning Department
101 Pauahi Street, Suite 3 | Hilo, HI 96720
Direct: (808) 961-8129
Michelle.Oda@hawaiicounty.gov



From: Sakai, Kimberly <Kimberly.Sakai@hawaiicounty.gov>
Sent: Monday, December 23, 2024 10:54 AM
To: Planning Internet Mail <planning@hawaiicounty.gov>
Subject: FW: Reschedule General Plan 2045 Meetings in January 2025

From: Mele Akua <mele_akua@yahoo.com>
Sent: Monday, December 23, 2024 10:49 AM
Subject: Reschedule General Plan 2045 Meetings in January 2025

To Hawaii County Planning Department and Windward Planning Commission:

Please reschedule the Windward Planning Commission General Plan meetings in January 2025 for public testimony.

There is practically no knowledge of the GP 2045 among Big Island locals, yet it will change how we ALL live here. As someone already testified, we all get a property tax bill in the mail, so why weren't we sent a letter about the General Plan Meetings, encouraging public participation? Whenever I ask someone if they heard about the General Plan 2045, they **ALWAYS - 100% of the time** answer "No, what is that?"

The public, who you claim to serve, deserves the right to learn about the GP 2045 and give their public testimonies on it, yet you've taken one opportunity away by

cancelling the January 2 & 3 meetings.

If you really work for us, then show us by rescheduling the January meetings.

Do what is right for the benefit of the people not to the benefit of the few.

Mahalo!

From: [Kim Magoon](#)
To: [WPCtestimony](#); [LPCtestimony](#)
Subject: RESCHEDULE the Big Island General Plan (GP) 2045 public testimony January meeting
Date: Friday, December 27, 2024 5:48:31 PM

Aloha,

I'm wondering why the Big Island General Plan (GP) 2045 public testimony meetings were canceled for January. I along with many others would like to request that they be rescheduled and accessible for us in January. It is important for the community to be able to learn more about these proposed items and be able to have input on things that will greatly affect us.

PLEASE RESCHEDULE THE JANUARY MEETINGS.

Mahalo

Kim Magoon
Magoon808@gmail.com

From: [tina Baugh Garber](#)
To: [LPCtestimony](#)
Subject: I vote no to general plan, twenty forty five.Hawaii big island.
Date: Sunday, December 29, 2024 3:58:50 PM

Public declaration of opting out

Absolutely NO General Plan 2045 Hawaii Big Island. I VOTE NO

THIS IS MY PUBLIC NOTIFICATION THAT I AM OPTING OUT AND WILL NOT PARTICIPATE IN THIS PLAN AT ALL, OTHER THAN TO VOTE, NO AND TO OPT OUT.

I am making a public declaration. I will not be party to this in any form, fashion shape or how.

I vote NO on General Plan 2045.

Furthermore, I will absolutely not have anything to do with this bill, and this bill will not have anything to do with me any property or any livelihoods or possessions that I have OR anything my children A and Z have. You are not allowed to touch anything or to take or control anything I own.

Everything I have I've worked for.

This is my public declaration. This is my world declaration. You are not implementing this in any way on me, or any of my family.

This island should revolt against you, and this bill. This is not right. This is a deception telling us that they can fix a problem of tomorrow when they cannot even fix anything today. Nor have they fixed yesterday.

It's a joke. I will not be party to this ugly ugly horrible plan of General plan 2045 Hawaii Big Island.

You will have three days to respond to my declaration. If not, this is a legal and binding contract.

You have five business days to respond in writing via mail usps, from today. Dec 29, 2024 at 3:43 p.m. Hawaii time

You've been served.

Tina M. Garber
3**-**-7434

Sent from my T-Mobile 5G Device

Get [Outlook for Android](#)

From: [tina Baugh Garber](#)
To: [LPCtestimony](#)
Subject: Reject
Date: Monday, December 30, 2024 7:01:32 AM

Reject this plan.
I reject this plan.
The future generations REJECT this plan.
NO to General Plan 2045

NO to stealing lands and land rights.
NO to stealing any Hawaiian land.
NO to the stealing any native or privately owned land.

NO NO NO

STOP.

From: [Mike Reimer](#)
To: [LPCtestimony](#)
Subject: testimony for Hawaii General Plan 2045
Date: Tuesday, January 7, 2025 5:56:29 AM
Attachments: [TESTIMONY Hawaii General Plan 2025 to be sent January 7 with cover letter.docx](#)

Leeward Planning Commission
West Hawai'i Civic Center
Building E Second Floor
74-5044 Ane Keohokālole Highway
Kailua-Kona, Hawai'i 96720

Sirs:

I am submitting testimony as an attachment for the Leeward Planning Commission
January 16-17, 2025 Special General Plan Meeting.

Respectfully yours,

/s/

Michael Reimer, Ph.D.
Geologist
Denver, CO
GeoMike5@att.net
January 7, 2025

Leeward Planning Commission
West Hawai'i Civic Center
Building E Second Floor
74-5044 Ane Keohokālole Highway
Kailua-Kona, Hawai'i 96720

Sirs:

I am submitting testimony as an attachment for the Leeward Planning Commission
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Respectfully yours,

/s/

Michael Reimer, Ph.D.
Geologist
Denver, CO
GeoMike5@att.net
January 7, 2025

TESTIMONY: Hawai'i County General Plan 2045: Leeward Planning Commission

January 16-17, 2025

p. 1

The concern that the Hawai'i County 2045 General Plan does not include sufficient discussion of subsurface issues has been presented in public forums and has considerable merit because, in Hawai'i, there is a strong connection of subsurface environment and the surface ecosystem.

Perhaps the best way to state concern about this omission is to mention a statement by Dr. Nicole Deziel, lead author of an article addressing subsurface environmental manipulation. In an overview of her article, she cautioned, *"Researchers and policymakers tend to focus on only one domain, when they really are interconnected."* (*Synergies and Trade-Offs in Reducing Impacts of Unconventional Oil and Gas Development on Wildlife and Human Health in Bioscience 72: 472-480, March 2022*).

Because of this robust surface and subsurface domain connection on Hawai'i Island, I strongly concur with the concern to have the 2045 General Plan include subsurface issues and I provide commentary on some issues that have been previously mentioned.

The issue of the subsurface environment with emphasis on hydraulic fracturing (or fracking) has been addressed as a need for inclusion in the 2045 Hawai'i County General Plan (Brenda Ford, Letter to Editor, West Hawai'i Today, December 6, 2024). When fracking is mentioned, most people think of it being employed for enhanced oil and gas extraction from tight rock formations underground. That may not seem to have any application in Hawai'i but fracking can be used for much more than oil and gas extraction and for situations that are common in Hawai'i. For example, hydraulic fracturing can be used for: Stimulating groundwater wells; Mining; Waste remediation and disposal; Measuring Earth stress; Electricity generation for geothermal resources; Geological sequestration of CO₂; Pumped storage hydroelectricity (for non oil and gas issues, see <https://en.wikipedia.org/wiki/Fracking>).

Because the impact of fracking extends beyond underground rocks and fluids, and influences both surface and atmospheric characteristics, fracking, and indeed, other subsurface activities that may be implemented, are reasonable items for discussion and inclusion in the General Plan. Fracking exclusion was added in 2013 to the Hawai'i County Code (Chapter 14), Article 21, Section 14-120 through 14-127. There will most likely be requests for exceptions to this exclusion. There was a plan in 2015 to evaluate the possibility of a geothermal resource on Hualālai but it was canceled. (<https://www.thinkgeoenergy.com/university-of-Hawai'i-cancels-planned-geothermal-exploration-work-at-hualalai/>).

TESTIMONY: Hawai'i County General Plan 2045: Leeward Planning Commission

January 16-17, 2025

p. 2

In 2023, Hawai'i Home Lands was seeking to evaluate the development of geothermal resources under its lands. (<https://www.higp.Hawaii.edu/hggrc/Hawai'ian-home-lands-seeks-6m-to-test-for-geothermal-power/>). Therefore, including a discussion of subsurface development in the County Plan is merited.

There is a long history of fracturing rock as a means to increase its permeability. Increasing permeability was first used in the 1860s to increase the amount of water available to wells. Explosives were lowered into the drilled or dug well. This practice was given a name and called "shooting the well," and had a very localized effect. This practice of increasing permeability of rocks on a large scale was then applied to oil recovery and recently to gas recovery as a means of extracting more energy resources from underground areas where rock permeability is so low as to prevent free flow of those fluids. Perhaps the largest use of fracking was a project to use atomic bombs to cause "fracking" over vast areas. This was done in the 1950s as part of Project Plowshare, when the concept of using atomic weapons to create great canals was proposed, perhaps to form competition to the Panama Canal. It was also thought to be applicable to enhance the flow of natural gas by increasing permeability of tight rock. In 1969, an atomic bomb was set off underground near Rulison, Colorado to see if it could enhance flow in natural gas by fracturing the fine-grained, low-permeability sandstone of the Williams Fork Formation of the Mesaverde Group. It did, but the gas was radioactive and not really useful for commercial use. (<https://www.energy.gov/sites/prod/files/2020/04/f74/RulisonFactSheet.pdf>).

Although this seemed an extreme fracking approach, today's hydraulic fracking activities are not without their own pollution problems. Hawai'i government agencies are no stranger to pollution effects from various activities in the state, including disposal of public sewage wastewater and pollution created by military activities, the most recent of the latter being the Red Hill fuel releases into potable groundwater supplies and the use of radioactive materials in training exercises on Oahu and Hawai'i Island.

Hydraulic fracturing (fracking) is a drilling technology that involves pumping large quantities of fluids at high pressure into a wellbore and into the target rock formation. The fluid typically contains water, a proppant (a material like spherical sand particles to keep the fractures open), and chemical additives. A large fracking operation can require millions of gallons of water pumped underground. The chemicals, in large part used to reduce the viscosity of water so the proppant flows readily into the fractures, are

often stored in surface holding ponds that are unlined and can leach into the ground and become part of the natural groundwater. The hydraulic fracturing operation itself, with

TESTIMONY: Hawai'i County General Plan 2045: Leeward Planning Commission

January 16-17, 2025

p. 3

its above ground equipment and chemical mixing ponds, is a major source of pollution and, it is not necessarily the fracturing of rock that causes large-scale introduction of pollutants into the groundwater, but the leaching from the surface chemical holding ponds into the subsurface that pollutes potable water sources.

(<https://www.nrdc.org/stories/fracking-101#work>).

One point I will make is that the impacts of hydraulic fracturing are still being studied. Many of the chemicals injected to force fracture have not been evaluated to know their potential toxicity. They have no EPA guidelines for a level of concern. It is a complex system and pros and cons can be found to argue any individual point. It is not sufficient to say that analyses for contaminants only for which EPA has guidelines have been conducted and none are above the EPA thresholds levels of concern. There are thousands of chemicals that EPA has not studied for their toxicity that end up in potable groundwater supplies. But a rule of thumb can be applied. Those chemicals at any level used in fracking should not be there. There is little doubt that fracking operations do pose risks to human health and not just for oil and gas resource enhancement (<https://www.urmc.rochester.edu/news/story/study-links-fracking-drinking-water-pollution-and-infant-health>: see Hill, Elaine L. and Lala Ma, 2022, *Drinking water, fracking, and infant health*, *J. Health Econ.*, 102595).

I note that there had been some discussion in the public forum (Bobby Camara, Letter to Editor, West Hawai'i Today, December 21, 2024) about the issue of fracking and contamination of the main island system of freshwater lying above the oceanic salt water in the same aquifer of the island. The letter postulated that there would be no mixing of the two waters (i.e., contamination) because the lower density of the freshwater would always keep it above the denser saline water. The Ghyben-Herzberg groundwater system was referenced. That model is useful only in static conditions, and not the real-world dynamic system where stacked aquifer systems are always forced into a mixing scenario. Tidal forces, differential concentration diffusion, recharge of freshwater, removal of the freshwater through well pumping are some examples of how the system is constantly mixed. (Wentworth, C.K., 1947. *Factors in the behavior of groundwater in a Ghyben-Herzberg system. Pac Sci* 1(3): 172-184). Fracking can increase the interchange between those two systems.

On Hawai'i Island, there are occurrences of perched water reservoirs where there is an impermeable layer between that perched freshwater reservoir and lower

freshwater/saline water reservoir. An example of one such perched reservoir was found from drilling at Pōhakuloa Training Area Training Area (PTA) as the Army was trying to find a local potable water source so they did not have to transport water.

TESTIMONY: Hawai'i County General Plan 2045: Leeward Planning Commission

January 16-17, 2025

p. 4

Freshwater is provided to PTA by trucking, a major operation that requires about 4,000 trucks a year with 5,000 gallons each of potable water. The cost is over three million dollars a year. The Army entered into a cooperative project in 2013 to drill at PTA to see if freshwater could be found to provide supply for PTA. The plan was to drill a hole over 6,000 feet deep to encounter the saline level at sea level and hope that freshwater reservoirs were found above this saline level. Surprisingly, the drill hole encountered a perched freshwater reservoir at a 600-foot depth.

(<https://www.dvidshub.net/news/229643/army-taps-consortium-find-water-training-area-high-up-hawaiian-volcano>).

Any near-surface reservoir could easily become contaminated from the toxins used during training exercises, just as the unlined ponds for fracking development have leached through the porous overburden into groundwater. The freshwater perched reservoir found was never developed. This drilling occurred in 2013 and it is unknown if the contamination from the PTA surface operations contaminated that shallow freshwater reservoir. Such a potential pollution source is described below but it is not the only one that could provide contaminants for underground water sources.

A major concern of groundwater pollution today is “forever chemicals”, those per- and polyfluoroalkyl substances (PFAS), commonly used in fire-fighting foams, which do not breakdown in the environment contribute greatly to health risks. The U.S. Army has been analyzing for those “forever chemicals” that have been part of the releases into the environment from their training activities at PTA and Kilauea Military Reservation. (https://aec.army.mil/aec/6616/9869/7418/PTA-KMR_PFAS_PASI.pdf).

The analyses so far seem to have been only conducted in soils and not groundwater. This 2023 report states that, for PTA, historical reports place ground water levels several hundred to 1,000 feet or more below the surface and so they were not sampled. It is incongruous that this 2023 report ignored the perched groundwater table found at 600 feet below the surface as it was being considered for a potable water source. Testing it would have provided important information on the rate of movement of contaminants below the surface. The Army has established their own risk-based screening concentration levels above which they would conduct further studies for remedial action. That level was set at 70 parts per trillion. In a report of July 2023, concentrations in soils were found at PTA above those levels (Table ES-1 in https://aec.army.mil/aec/6616/9869/7418/PTA-KMR_PFAS_PASI.pdf).

TESTIMONY: Hawai'i County General Plan 2045: Leeward Planning Commission

January 16-17, 2025

p. 5

The Army states “*While not an enforceable regulatory standard, this represents a concentration in drinking water that is not expected to produce adverse health effects if the water is consumed over an entire lifetime.*” (<https://aec.army.mil/PFAS/HI/PTA>). No reference to support that claim is given in that notice.

However, this is now in conflict with recent U.S. EPA levels. In April of 2024, the U.S. EPA set levels for drinking water, depending on the type of forever chemical, at 4-10 parts per trillion. (<https://www.epa.gov/sdwa/and-polyfluoroalkyl-substances-pfas>).

“*EPA expects that over many years the final rule will prevent PFAS exposure in drinking water for approximately 100 million people, prevent thousands of deaths, and reduce tens of thousands of serious PFAS-attributable illnesses.*” Ibid.) This statement from EPA about PFAS contamination foretells a tremendous health benefit with the elimination of this toxin in the environment.

Why would fracking be done at PTA? Perhaps for several reasons, not only to increase water flow from the perched water reservoir but to include underground waste disposal and energy production. It was noted that when this perched water was found at PTA, lower levels of that groundwater were found to be at higher temperatures, up to 250 degrees Fahrenheit. It was suggested at the time of that finding, the warmer water could be used as a source of steam to run electricity-generating turbines. (<https://eos.org/articles/underground-water-reserves-found-hawaiiis-high-country>).

The contamination risk could be exacerbated with fracking operations, opening flow paths from a larger volume for water migration. Another potential source of contamination is injecting waste underground. In 2005, when the EPA began enforcing elimination of cesspools containing human excreta, it provided the U.S. Army at PTA with minimum regulations to prevent the contamination of groundwater that could be used for drinking purposes by underground injections of that waste. Fracking is a means to increase underground storage reservoirs for fluids and gases. The U.S. Army operated six large capacity cesspools at that time. (<https://www.epa.gov/sites/default/files/2015-09/documents/cafo-pohakuloa05.pdf>).

A study conducted by the University of Hawai'i showed how injecting wastewater into a saline underlying reservoir would contaminate a freshwater reservoir above it (*Duane L. Heutmaker, Frank L. Peterson, and Stephen W. Wheatcraft, March 1977, Technical*

Report No. 107, A laboratory study of waste injection into a Ghyben-Herzberg groundwater system under dynamic conditions). Fracking would increase the pollution potential.

TESTIMONY: Hawai`i County General Plan 2045: Leeward Planning Commission

January 16-17, 2025

p. 6

The larger picture is one of critical interest. Because fracking and other technologies that impact the subsurface can influence the surface and atmospheric environment it is worthwhile to address it as a concern in the General Plan. Hawai`i's social, cultural, economic, health, safety, and quality of life domains among others depend on sustainability of the environment. There is a chance to minimize additional negative impacts in the future. And that needs to be addressed now.

Respectfully submitted,

Michael Reimer, Ph.D.

Geologist

Denver, CO

GeoMike5@att.net

January 7, 2025