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City & County of Honolulu  
Department of Environmental Services  
Kapolei Hale, 1st Floor, Conference Room A  
1000 Uluohia Street, Kapolei, HI 96707  
July 31, 2019, 5:00 - 8:00 pm

RE: Integrated Solid Waste Management Plan (ISWMP) Updated

Dear Planning Committee, Writers and Authorizers,

Thank you for the countless hours you have invested in coming up with this plan. While I appreciate your time; I am incredibly confused by the outcome - the contents of the plan. I have a few comments to share about the confusion of which direction the plan is pointing us in, and concern for the opportunities that were not included.

The first paragraph of the Executive Summary of the Plan refers to commitments to the United Nation's Paris Climate Agreement and the alignment of goals with United Nation's 17 Sustainable Development Goals.

To be clear, the United Nation's definition of "Renewable Energy Sources" does NOT include "municipal solid waste incineration." (See Attached: Renewable vs. non-renewable energy sources, forms and technologies prepared by. A.Gritsevskiy, IAEA. Source: <https://unstats.un.org/oslogroup/meetings/og-04/docs/oslo-group-meeting-04-comments-issue-3.2-iaea.pdf>)

While the United State's Environmental Protection Agency may consider burning waste as a "renewable" source of energy - you have expressed a commitment to the cleaner standard set by the United Nations.

Your draft plan seems all over the place when it comes to the management of waste as an energy source. On page ES-3, you cite the City's goal to eliminate carbon-based single use plastics and polystyrene from the waste stream going to H-Power and landfill by 2030. Then a couple paragraphs below, in the same section and same page you reference "curbside recyclables like mixed paper and plastics could be combusted at H-Power."

Instead of purchasing a fourth boiler at H-Power, further financially chaining us to this unrenewable energy source. We should invest in state of the art recycling-sorting facility. The reason why China has turned away imports of recyclable materials is because of contamination of the supply. The blue bins may have increased accessibility for more people to participate in the recycling stream, but it has also contaminated the supply. I preferred the large metal containers that used to be at the schools, that allowed me to sort my recyclables at least between glass and plastic and paper and cardboard.

Many of us on the Tour de Trash were shocked by the bundles of paper that had plastic in it and the bundles of plastic that had paper in it. The frustration foreign recycling centers were having was evident in the cross-contamination we witnessed first hand.

Another thing to remember, when retailers import containers of goods into Hawaii, embedded in the cost of shipping is the cost to ship that empty container back. It cannot be that much more expensive to ship packaging back to its source. Retailers like Patagonia do this.

Tires should not go into the WTE stream. "Some tire makers are making strides in reducing more of their environmental footprint by developing manufacturing and recycling processes that could eventually see as much as 80% of the content of a new tire coming from material recycled from previously used tires. . . . According to Michelin, the present worldwide recovery rate for tires is 70% and the recycling rate is 50%. The company announced last summer that within 20 years, when its renewable and recycling ambitions are fully realized, it will be using 80% sustainable materials in the manufacturing of its products and 100% of tires will be recycled." (See <https://www.truckinginfo.com/327219/sustainable-tires-reduce-reuse-and-recycle>)

In conclusion, The United Nation's Paris Climate Agreement uses the terms "ambition" or "ambitious" 16 times throughout its 32 pages to underscore the urgency needed to course-correct away from our climate crises. According to Merriam-Webster, some of the antonyms of "ambitious" are: lazy, half-hearted, cowering. When you are making decisions about what to leave in and what to take out of this draft plan - please ask your self "which competing course of action or goal is more ambitious and less resigned." Be like the Paris Climate Agreement and always err on the side of ambitious.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Cochrane", with a long horizontal line extending to the right.