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RECEIVED

January 8, 2008

TO: Gary Okino

FROM: Barbara Marshall 

RE: Draft Integrated Solid Waste Management Plan

As you requested, here are my written comments about the draft transmitted to the Council. You have assured us these comments will be passed along unedited to the Solid Waste Advisory Committee.

First, the Council was promised—and the Administration was legally bound to provide—a 25-year-plan to the Council by January of 2007(Ordinance 06-27). Instead the Council on November 16, 2007, received a draft 5 year plan. This is not a 25 year plan and it is currently on a timetable to be two years late.

Second, this is not a plan. This is a compilation of activities underway and contemplated by the Administration currently and in the next few years. It gives no appearance of going beyond what was told to the exorbitantly-paid consultant by the City's own Environmental Services Department, specifically the employee designated by job description and within the report as having responsibility for planning (see p. 12-12 below).

Third, there are great gaping holes even in the commentary provided in this document. Some of the statements made are mystifying: Page 1-2, for example, makes the comment "Hawaii is unique because in addition to a resident population of over 912,000 in 2005, there are 4.7 million visitors to the island each year." What is there about visitors that makes Hawaii unique? All major metropolises in America have millions of visitors a year. This is the kind of statement that casts suspicion on the entire document.

Other specific high (or low!) spots:

P. 1-14: The discussion of the Community Recycling bins makes no mention of the costs to the city for this program—yet talks about expanding it with no discussion of the fact that the city is currently PAYING rising rates to recycle paper.

P. 1-19: The discussion on Green Waste on page 1-19 includes no discussion of the problems associated with the pilot program on automated Green Waste collection—and states that one-third of the households are using the "automated blue-bin collection system" which is greater than the figure provided to us by ENV in the course of the pilot program. Additionally, there is no discussion of how the city will deal with excess green waste in areas which now have two to

four bins for automated collection of green waste. Currently in the pilot program, green waste is collected the day after trash pickup—allowing residents to use their grey bins to handle excess green waste. This won't be possible under the new system as conceived—but there is no discussion of any of this in the report.

P. 2-9: Table 2-8 lists annual weight amounts by category for H-Power and Waimanalo Gulch landfill. While the TOTAL column at the bottom of the page computes, the totals of the individual materials do not. Why?

P. 3-7: The plastic bag issue is given short shrift—with no discussion of the pros and cons of banning plastic bags, even though this has been proposed here and in other cities.

P. 4-2: Acknowledges that the state does not recognize waste-to-energy as recycling—and notes there fore that the City does not meet the regulatory goal—but makes no mention of whether there should be a change in the state's attitude, or why waste-to-energy is not regarded as recycling—or whether the city should therefore abandon H-Power. Further there is no discussion of what happens if the city does not purchase H-POWER or what costs might be incurred if that were to happen. And it's unclear whether the ISWMP accounts for adding a third boiler at H-POWER.

P. 4-7: Section 4.3.3: These are statements, not discussion. There is no listing of pros and cons, and the same is true of the subsequent sections. Section 4.3.4—again, referring back to p. 1-14 on community recycling bins—what is the cost to the city? Shouldn't there be an estimate at least, when we know the costs are rising? Shouldn't cost enter into the policy-making? And how does the city's plan to do island-wide curbside recycling jibe with adding community recycling bins? The chapter goes on in the same vein.

P. 8-18: There is mention of the RFP for options on alternative energy—and a note that no vendor has been selected (even though the Council was told the vendor would be chosen by September of 2007) and there is no discussion as to the value of such a facility and the report seems otherwise to focus only on H-Power expansion. We need a discussion of the pros and cons of these systems—not a restatement of Administration process.

P. 8-21: The discussion of shipping is cursory at best—and lists prices far beyond those mentioned by specific vendors in the past, which were in the \$70-a-ton range, and known to the current Refuse Division management who provided the information for this report. R.W. Beck representatives told Councilmembers they obtained these numbers by piecing together various elements of shipping—as opposed to talking to a vendor or using a comprehensive price. Additionally, the report says “the contract term would commence in 2011” but there is no discussion of getting it done sooner—nor of a non-city owned facility.

P. 8-22: It's assumed the City will “transport and dispose of 600,000 tons of MSW per year?” On what was this figure based? And where is the discussion of how this might affect H-POWER and landfill tipping fees?

P. 9-4—9-7: These are paragraphs relating what others—from non-profits to the state—are doing in regards to recycling—but there is no discussion of how this affects or doesn't affect the city's plans.

P. 9-9: The figures on costs for paper recycling finally list the dramatic drop in paper prices in 2006—with no updates—and lists casually in the last line that paper might best be used as fuel at H-Power—but there is no suggestion, e.g., for changes in the ordinance that requires city buildings to recycle paper, etc. This is particularly significant given the revelation in the Executive Summary (see ES-4 below).

P. 12-2: Table 12-1: The Solid waste management scenarios are lacking any listing of our current system—assuming that any scenario is better than what we have, but giving no reason or discussion as to why. MSW collection and Green Waste collection give no hint of current operations—only what is currently planned. The only reference to shipping says costs not available—but other scenarios don't mention costs. And since costs are mentioned in other parts of the report—why would this table list “costs not available”?

P. 12-6: Discussion of the various scenarios lists specific amounts of MSW and green waste recyclables with no indication of how those assumptions are made.

P. 12-12: Section 12.6.1 clearly states the Refuse Division Chief's main responsibilities include long-range planning, conducting studies and preparing annual budgets. Given that the Refuse Division Chief is one of the highest paid employees of City Government, why was it necessary to spend a million dollars to have R.W. Beck write down what he thinks?

P. 12.9: Conclusions state the Base Case has the lowest operating expense—but lists no reason, then, to change and we did not find this in the discussion.

P. ES4: The discussion of pros and cons of recycling paper versus burning it admits that the analysis was done without knowing the environmental impact of Asian paper mills, where most Honolulu paper is recycled. Without that, any discussion is empty—and we are unable to determine whether to continue recycling paper. A “plan” should contain specific amounts of paper waste going to any destination and how it is handled there, including its environmental impacts.

P. ES8: Table ES1: Solid Waster Management Scenarios, specifically states “all waste not recycled or used as fuel at H-POWER is disposed of at the landfill through 2014”. This allows no other option for disposal. R.W. Beck spokespersons say they did consider other options—but there is no discussion of such. Any plan should include such a discussion with supporting data, particularly as the Council has set policy to include alternate methods as goals for reducing or eliminating the use of a landfill.