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Comments of David Glenn Bettencourt

Upon reading your EA/EIS Prep Notice for HIREP I could only come to the conclusion that the train has already left the station, completely abandoning the development of OTEC stations that eventually generate the compete base load 24/7/365 without inter-island cables. I must assume that the term "programmatic" as used through the document is in reality a euphemism for "greasing the wheels." The assumption clearly made, but not yet disclosed, is that Hawaii should remain completely dependent of foreigners for their energy, but the identify of those foreigners is changed from Standard Oil-Shell, etc, to Goldman-Sachs, Murdock (Castle and Cooke), etc. Long live the new Big Five (of Fifty, or Five-Hundred).

The only logical course to meet all needed goals (not just politician's self-perpetuation) in the foreseeable future is a small modular nuclear generation, combined with co-generation by offshore OTEC plants as fossil fuels are phased out. By the end of the life-cycle of such a plant (60-80 years) the alternatives of fusion or other power sources should be available I recognize that politicians cannot back this alternative due to their complete addiction to polling results, but nuclear power is finally going to make sense as an interim solution until OTEC plants come on line. Nuclear power never made sense for Hawaii in the past for several reasons, primary among them being (all other objections aside) that the smallest available plants were way to large for Oahu's (or Hawaii's) needs. This is no longer true, and costs are coming down as 250 MW to 1000MW modules are being designed for construction off-site in plants for shipping to generation sites.

The world-wide realization that nuclear power is the only major source available in the next twenty years that can fulfill all energy needs 24/7, does not create greenhouse gases, does not require the taxpayer to subsidize private greed, and does not require massive land areas of natural land. I know risks exist (See, "The Curve of Binding Energy" by John McPhee) of terrorist attacks, but security is now much better, the reactors more efficient and safe, and the costs more reasonable than forty years ago.

I have watched for years as incompetent and expensive contractors tried to stir up interest in hydrogen as a "fuel" when it fact it is only an energy carrier, and a not so good one at that; it takes a lot of energy to make. It makes sense where it is a by-product of chemical production, or where it's made with off-peak hydro or nuclear electricity. These "experts" proposed (without consulting the locals) construction of massive geothermal generation facilities on the Big Island, generating hydrogen (and sulfur) and then reducing the bulk by cryogenic storage for shipping. They also proposed undersea cables from the Big Island to other islands. In public meeting these State contractors could not even answer the most basic cost and efficiency questions; ask Mina Morita. Now these same "experts", who know more buzzwords than engineering, have moved on to wind. But they get the concept backward; energy exists to serve Hawai'i's people and lifestyles; those people and lifestyles cannot be sacrificed to serve the needs of energy.

Several years ago we had some good demonstrations of why modern housing and community infrastructure on Oahu have developed in the wrong direction. After a major storm knocked out electric power on large parts of Oahu, I drove into town early the next morning from Waimanalo through Hawaii Kai; thousands of parked cars littered the roads, streets and highways. I realized that the drive had been

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beautiful because the lack of streetlights and signs made the moon and stars visible. I then realized these cars were clogging the streets solely because their owners could not put them in garages totally dependent on electric garage door openers. Many of those same people complained bitterly (although the night was not that hot) the next day due to their lack of air conditioning. None apparently lived in houses designed or constructed to encourage natural ventilation, daytime shading or thermal mass. That one morning brought home everything that is wrong with our addiction to electric power; we plant air conditioners but not trees; we insulate but don't ventilate; we can't get off our fat asses to open a garage door; and we've polluted our natural world with light, boom-boxes, and noise. Any concept designed to feed Oahu's glut for energy (until we run out of water, roads, space, jobs, etc) is flawed from the start.

While I recognize that "high-tech" is the new mantra (even when applied to projects that demonstrate only the trailing-edge of technology), and this project is being sold as "green" and "high tech", it is nothing of the kind except or its risks. The document contains no discussion of base-load generation (assumed to remain dependent on fossil fuel with new plant construction required), single-point failure modes (length of repair time for undersea cables), public taxpayer costs (for giving rich people/entities tax breaks), increasing Oahu electrical demands (and reducing water and road availability), inducing population concentration (and pollution) on Oahu, or creating a massive soft target for terrorists (or disgruntled Hawaiians) and/or accidents.

The document's discussion of alternatives is limited to the do-nothing alternative, but even that "alternative" is directed purely to privately-owned but publicly funded wind projects. I recognize that wind energy will always be a component of meeting future energy needs, but the entire wind concept at the percentage levels being discussed is completely flawed, as is the concept that the neighbor island should be made into subservient energy colonies to serve the gluttonous needs master island Oahu. The document clearly refused to discuss any real energy alternatives that do not require: (a) several interisland cables; (b) tax incentives (read "others pay our share of the taxes for us"); (c) venture capital (read "foreign money"); (d) long term increases in energy addiction (rather than conservation), but to non-regulated "dealers" (First Wind, Murdock, etc), or (e) political payoffs from lobbyists.

I have never seen a State of Hawaii program so configured to follow to a chosen course of action since the decision to build the H-3 Freeway through Moanalua Valley; eighteen years and an act of Congress later it was built through Halawa Valley. One EIS after another ignored and/or failed to discuss the impacts, and now we have bumper-to-bumper traffic 4-5 hours per day (longer on weekends) in my area (Waimanalo) generated by H-3 users. Not one H-3 EIS mentioned this impact on Waimanalo. For that reason I read this document carefully, aware that many of the parties involved in its preparation suffer from "dial-an-opinion" type reliability for politically desired results.

Obviously this document is intended to grease the way for subsequent multiple EIS-*ik*i by each site/entity, and to give significant advantages to the Lingle/Big Corporation wind entities over all other technologies. If the purpose of this project is to eliminate energy dependence, it should not subject Hawaii consumers to the dictates of Murdock, First Wind, or any other private entities who will reap both massive income and tax benefits (i.e., other taxpayers paying taxes in their stead) that belong solely to the people of Hawaii. It is the Hawaii taxpayers who will end up paying for these windfalls (pardon the pun) through state and federal tax credits, state and federal funding of infrastructure, state and federal subsidies (welfare) to non-

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energy conserving households, and back-up base-load generation capability. If this project had been on line the last few weeks it would not have generated one KWH of power, just as the existing DOT-A windmill facilities on Lagoon drive were motionless due to lack of wind.

This document is so deceptive (or completely lacking) as to the basic physics and practicality of wind generation that a technical discussion of its contents (such as they are) is useless. For instance, the continual reference to the Lanai as "200 MW of wind generation" is a joke when the average production, over a calendar year, will only be at a 50-60 MW rate. No realistic costs or financing schemes are predicted for the cable, the impact of tax incentives, or even the eventual costs of the power. As reported widely, the private owners of existing wind and solar installations of existing State of Hawaii facilities (primarily DOT-airport facilities) are making windfall profits and receiving tax breaks; they are twice as expensive as existing fossil fuel generation per KWH. By comparison to this giveaway, the Wall Street bailout was child's play. How are Murdock and First Wind to be controlled in future negotiations when the State was unable to negotiate small supplier contracts and protect the public interests? What happens when Murdock decides to turn off the switch when he doesn't get his way.

The entire concept of a "programmatic" document is flawed when there is yet to be a meaningful comparison of all reasonable alternatives. This programmatic process has only one program goal; putting Lingle into the Senate in 2012 as Ms. Green. Regardless of her personal merits, the taxpayers and energy consumers of Hawaii will only be properly served if energy sources are studied scientifically, not politically.

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