

HISTORIC HAWAII FOUNDATION

March 3, 2011

Allen G. Kam, Esq., AICP
HIREP EIS Manager
State Energy Office, Renewable Energy Branch
Department of Business, Economic Development and Tourism
P.O. Box 2359
Honolulu, HI 96804

Dr. Stephen Chu, Secretary
U. S. Department of Energy
1000 Independence Ave., SW
Washington, D.C. 20585

RE: Scoping for the Environmental Impact Statement (EIS) for the Hawai'i Interisland Renewable Energy Program (HIREP): Wind.

Dear Dr. Chu and Mr. Kam,

Historic Hawai'i Foundation (HHF) appreciates the opportunity to comment on the scope of the Environmental Impact Statement for the proposed HIREP: Wind project. HHF also formally requests to be a consulting party under Section 106 of the National Historic Preservation Act of 1966.

Interests of Historic Hawai'i Foundation

Historic Hawai'i Foundation is a membership-based non-profit organization incorporated in 1974. HHF's mission is to preserve and encourage the preservation of Hawaii's historic buildings, sites, structures, objects and communities. As the leading statewide advocate for historic preservation, HHF participates in efforts to identify historic properties in order to avoid, minimize and mitigate adverse effects that could result from proposed undertakings.

Understanding of the Undertaking

The proposed HIREP: Wind project is one component of the Hawai'i Clean Energy Initiative, a comprehensive energy agreement between the State and the Department of Energy, with the stated goal of changing the way in which renewable energy resources are planned and used in Hawai'i. The initiative's goal is to move the state away from a dependence on fossil fuels for electricity and ground transportation by achieving 70% clean energy by 2030 through a combination of 30% efficiency measures and 40% from renewable energy sources. HIREP: Wind would produce renewable energy from sources such as wind turbine technology and distribute the electricity generated via undersea cable. This system is projected to meet 14% of the 40% renewable energy goal.

The EIS is funded by \$2.9 million appropriated through the American Recovery and Reinvestment Act. It will assess the possible impacts that may arise from the proposed wind energy development and include a range of options. The project would develop wind turbines on Maui, Lāna'i, and

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Molokaʻi, producing an estimated 400 megawatts of energy intended to power Oʻahu via an undersea cable. The proposed scope of this massive undertaking includes four islands and the ocean channels connecting them. The undertaking is reasonably foreseeable to have wide-ranging impacts on cultural and historic resources, which may vary according to the option being considered.

EIS Scope Recommendations

HHF recommends that the EIS include alternatives to explore and compare both comprehensive and detailed options, such as:

- Alternatives that explore achieving the desired 14% of the 40% renewable energy goal through multiple island-based projects that would serve each island county, rather than serve primarily Oʻahu through an interisland cable.
- Adjustments to the technical parameters (e.g. footprint, height, span, and equipment of the turbines) of the proposed technology in order to meet the best efficiency with the least impact to historic, cultural and natural resources.
- Site selection alternatives for wind generation (e.g. turbines) and distribution systems (e.g. cable embark and disembark locations between land and sea; structures and locations that tie the cable to the energy grid) to avoid and minimize impacts to historic, cultural and natural resources.

HHF recommends that the historic and cultural resources sections of the EIS include the following:

- Area of Potential Effect should include: the immediate and surrounding areas of the project footprint; areas from which the project will be visible; areas that will be impacted by temporary and permanent occupation (construction as well as operations); areas where traditional and cultural practices may be altered; and any auxiliary areas that will provide support to the project (e.g. worker housing during construction).
- Determinations of historic properties that are present and their eligibility for designation on the Hawaiʻi State or National Registers of Historic Places, to include historic buildings, structures, districts, sites, landscapes, public works, maritime and underwater resources, objects and traditional cultural places.
- Determinations of potential adverse effect on traditional cultural practices, including findings from relevant cultural and ethnographic studies.
- Determinations of potential effect on historic properties from direct effects, indirect effects, cumulative effects and reasonably foreseeable effects; these determinations should include temporary and permanent impacts, including those from construction activities.
- Alternatives should propose measures to avoid, minimize and mitigate adverse effects on historic properties and cultural practices.

HHF recommends that the process for developing the EIS should include procedures for public dialogue and resolution of issues. A protocol for communications, feedback, responses and follow-through will be critical.

As the project is expected to be complex and of long duration, HHF also recommends that a programmatic agreement be used to institutionalize methods for monitoring and reporting on impacts and results over the lifetime of the project, not just during the environmental analysis phase. A mechanism for making any adjustments and revisions to the project or to the mitigation

stipulations will also be needed, both from periodic review and revision to any agreements, and in emergency or as-needed basis.

The preservation community in Hawai'i is aware of other large energy development projects across the nation facing similar issues as the HIREP-Wind project. We have attached a copy of comments by the Advisory Council for Historic Preservation (ACHP) concerning one of these projects, Cape Wind Energy project on Horseshoe Shoal in Nantucket Sound, Massachusetts. The ACHP raises the issue of initiating Section 106 review early in the scoping process for National Environmental Policy Act (NEPA) compliance, prior to the investment of time, money, and extensive planning for the preferred location. Additionally, it points to not limiting review only to "designated" historic properties, but to seriously consider the possible existence of Traditional Cultural Properties (TCPs) that might be affected. HHF hopes that the lessons learned from other communities such as Nantucket will help inform and improve the process here, particularly in considering alternatives to the proposed project site that might avoid adverse effects to historic properties.

We look forward to learning more about these alternatives analysis and working together as the scoping process continues.

Very truly yours,



Kiersten Faulkner, AICP
Executive Director

Copies via email:

Dawn Chang, Ku'iwalu
Pua Aiu and Ross Stephenson, State Historic Preservation Division
Betsy Merritt and Brian Turner, National Trust for Historic Preservation
Elaine Jackson-Retondo, National Park Service
Keola Lindsey, Office of Hawaiian Affairs
Shad Kane, O'ahu Council of Hawaiian Civic Clubs