

Merz, Jeff

From: noreply@hirep-wind.com
Sent: Sunday, February 27, 2011 4:25 PM
To: Johnston, Douglas; Merz, Jeff
Subject: [HIREP Wind EIS] New Comment

A New Comment has been Submitted

February 25, 2011

Dear Allen Kam:

Thank you for the opportunity to comment on the scope of the Hawaii Interisland Renewable Energy Program: Wind Programmatic Environmental Impact Statement (EIS). I am concerned that the EIS will inadequately consider alternatives and will fail to address the social costs of locating huge wind farms on Lanai and Molokai. As a law student at the William S. Richardson School of Law, and a candidate for the Environmental Law Certificate, I want to ensure that the EIS process adequately considers alternatives, to wind energy and the location of wind farms, and compensates Molokai and Lanai residents for land consumed by the wind farm.

1. Alternatives to Wind Energy

Renewable Energy includes energy derived from many sources. Solar and geothermal energy is successfully being generated in Hawaii already, and wave energy is promising. NEPA and HEPA requires that EISs seriously consider alternatives to the proposed action. If only alternative locations, and not alternative energy sources, are considered, the EIS will not meet the legal requirements. When an agency prepares an EIS, it is forced to consider alternatives. Without considering all of the other renewable alternative energy options, options that could help Hawaii meet its clean energy goals, it appears that DBEDT and DOE have already determined that wind energy is the sole alternative. The EIS must seriously consider reasonable alternatives.

2. Alternative Locations

To Oahu's residents, the less populated Molokai and Lanai may seem the perfect places to locate a wind farm. To residents of these islands, those who will have to live with the project in their backyards, their islands are more than unoccupied space. For example, residents of Lanai use the proposed Wind Resource Area, a quarter of their island, for hunting, fishing, hiking, diving, and for cultural purposes. (Bloomberg.com, Billionaire Murdock forsakes Hawaii tourists with wind farm, Global Travel Industry News, April 23, 2009, available at <http://www.eturbonews.com/8954/billionaire-murdock-forsakes-hawaii-tourists-wind-farm>.) Although Oahu has less "unused" space, if use is measured by concrete, there are significant benefits to generating energy near the site of consumption. The EIS must consider locations beyond Molokai and Lanai. Utilizing many smaller wind farms, similar to those that already exist, should be seriously considered.

3. Social Costs and Compensation Alternatives for Lanai and Molokai Residents

If wind farms are built on Molokai and Lanai, residents must be adequately compensated for their loss of the use and enjoyment of the land; compensation alternatives must be considered in the EIS. On Lanai, groups like Lanaians for Sensible Growth currently see few benefits from the wind farm. (Lanaians for Sensible Growth, Lanaians For Sensible Growth's Position on the Proposed 'Wind Farm' Project, <http://Lānaicity.ning.com/>). Benefits could include levelized electricity rates, hiring island residents to construct the wind farms, educational opportunities, and profit sharing. These options should be considered in the EIS. The relationship of the community with the state is not DBEDT's only concern; an EIS must consider the "significant effects" that may "[s]ubstantially affect[] the economic welfare, social welfare, and cultural practices of the community or State." (Hawaii Administrative Rules §11-200-12B. 4. Emphasis added.)

The EIS must seriously consider alternatives to wind energy, to the location of the wind farm, and to how Molokai and Lanai residents will be compensated. The proposed wind farms are massive, and residents of these islands will be living with the consequences of DBEDT's decision making process for the foreseeable future.

Thank you for your consideration of these important issues and for your commitment to responsibly and respectfully completing the EIS.

/s/

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Submitted on Sun, Feb 27, 2011 / 04:24PM HST by Jessica Freedman

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