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Date: 03/01/2011 06:10 PM
Subject: Blue Planet Foundation comments on HIREP EISPN



BLUE PLANET FOUNDATION

Comments on Environmental Impact Statement Preparation Notice (EISPN) for the Hawaii Interisland Renewable Energy Program (HIREP) Wind on the Islands of O‘ahu, Maui, Moloka‘i, and Lana‘i

Submitted March 1, 2011

Upon reviewing the EISPN, Blue Planet Foundation requests that the following items be considered in the Draft Environmental Impact Statement for the HIREP Wind project:

Alternatives Analysis: A thorough analysis of the clean energy alternatives to the interisland wind project should be thoroughly examined in the EIS. The analysis should consider currently commercialized technologies as well as the rate of technological change (and anticipated cost) for those technologies over the term of the project under consideration. Alternatives might be comparable funding of aggressive efficiency programs, solar water heating, solar photovoltaic (both distributed and utility-scale), concentrating solar power, wave power, and other evolving technologies.

Inclusion of Oahu’s off-shore wind potential: The notice identifies wind resources across the state and assesses the impacts associated with wind development of the resources closest in proximity to O‘ahu on Lana‘i and Moloka‘i. The potential for off-island wind is mentioned, but there is no further discussion about the impacts, benefits or drawbacks to wind development in areas offshore O‘ahu, nor whether off-shore wind development could be a viable alternative or supplemental source to the selected locations on Lana‘i and Moloka‘i.

Economic impacts associated with cost recovery for cable developer and utility: If the cable developer and the utility are assured cost recovery in the event that the project stalls, falls short, or fails, who would bear that

burden, what would the economic impact be, and how significant is that risk?

Impacts of utilities' facility improvements and grid enhancements: The notice lists numerous improvements that may be required to accommodate the new wind power, including substation expansions and upgrades, new or upgraded equipment, new power lines strung on existing structures, new power line corridors, and expanded or upgraded or new delivery infrastructure in service areas. The impacts of these modifications--particularly the opportunity costs given limited ratepayer resource—should be included in the programmatic EIS.

Evaluation of No-Action Alternative: No evaluation of the costs or benefits of this alternative is included, except for the de facto observation that without the proposed action, there would be no comprehensive overview or analysis of a coordinated plan. We believe a detailed explanation of the opportunity cost of not moving forward with this project is necessary so that it can be clearly weighed against the drawbacks of the proposed action.

Blue Planet Foundation looks forward to reviewing the Draft Programmatic EIS for this project.

Blue Planet Foundation is a nonpartisan, nonprofit organization committed to ending the use of fossil fuels on Earth, starting in Hawai'i. Information about Blue Planet Foundation is available online at blueplanetfoundation.org.