

Hawai‘i Interisland Renewable Energy Program: Wind

Preliminary Final Version 1 Scoping Report

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ACRONYMS AND ABBREVIATIONS

BMP	best management practice
BOEMRE	Bureau of Ocean Energy Management, Regulation and Enforcement
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CIA	Cultural Impact Assessment
DBEDT	Hawai‘i Department of Business, Economic Development, and Tourism
DOE	U.S. Department of Energy
EIS	environmental impact statement
EISP N	Environmental Impact Statement Preparation Notice
EPA	U.S. Environmental Protection Agency
FR	Federal Register
HCEI	Hawai‘i Clean Energy Initiative
HIREP	Hawai‘i Interisland Renewable Energy Program
HPR	Hawai‘i Public Radio
HRS	Hawai‘i Revised Statutes
MW	megawatts
NEPA	National Environmental Policy Act
NGO	non-governmental organization
NHPA	National Historic Preservation Act
NOI	Notice of Intent
OEQC	Office of Environmental Quality Control
OHA	Office of Hawaiian Affairs
OTEC	ocean thermal energy conversion
PEIS	programmatic environmental impact statement
U.S.	United States

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1.0 THE SCOPING PROCESS

1.1 Introduction

This report summarizes the public scoping process for the programmatic Environmental Impact Statement (EIS) for the Hawai‘i Interisland Renewable Energy Program (HIREP) being undertaken jointly by the United States (U.S.) Department of Energy (DOE) and State of Hawai‘i Department of Business, Economic Development and Tourism (DBEDT) to evaluate the environmental impacts associated with a proposed wind energy generation, transmission, and delivery program.

DOE’s Notice of Intent (NOI) to prepare an EIS, including information on the scoping period, was published in the *Federal Register* on December 14, 2010. A copy of the DOE NOI was also published in the State Office of Environmental Quality Control’s (OEQC’s) *The Environmental Notice* on January 23, 2011.

All comments received during the scoping period of December 14, 2010 through March 1, 2011, including public review of and comment on the Final Environmental Assessment/Environmental Impact Statement Preparation Notice (EISPN) and NOI, are consolidated in this report in order to identify environmental issues/concerns that the DOE and DBEDT should consider during the draft EIS process. These comments were received by regular mail, e-mail, through the project website, and through testimony recorded at public scoping meetings held February 1–5, 2011, on O‘ahu, Maui, Moloka‘i, and Lāna‘i. Any comments received after the end of the scoping period and the completion of this scoping report will also be considered to the extent practicable during preparation of the draft EIS.

The National Environmental Policy Act (NEPA) provides that there shall be an early and open process for determining the scope of issues to be addressed in an EIS and for identifying the significant issues related to a proposed action. The purpose of this scoping process, including the scoping meetings, was to allow the public, and specifically the impacted communities, to provide comments on what the HI REP Wind EIS should study, including a reasonable range of alternatives. This information will then be used to assist resource specialists in data collection and analysis for the development of the draft EIS.

Supporting documentation for this summary report is provided in the following appendices:

- Appendix A presents the NOI to prepare an EIS and the notice of public scoping meetings and opportunities to comment published in the *Federal Register* on December 14, 2010 and January 12, 2011, respectively. This appendix also contains a notice of the EA/EISPN and a copy of the NOI as published OEQC’s *The Environmental Notice* on December 8, 2010 and January 23, 2011, respectively.
- Appendix B contains local newspaper scoping meeting notification publication information.
- Appendix C contains relevant DBEDT news releases requesting public input that were circulated prior to the scoping meetings.
- Appendix D contains the informational banners that were presented at the scoping meetings.
- Appendix E contains the fact sheets that were made available to attendees at the scoping meetings.
- Appendix F contains the actual comments received, categorized by commentor type and/or comment submission method, during the scoping period of December 14, 2010–March 1, 2011, including written transcripts of oral comments received at the scoping meetings.

1.2 Project Overview

The draft HIREP Wind EIS will evaluate the environmental impacts associated with a proposed wind energy generation, transmission, and delivery program. The proposed action is for the development of wind-generated energy under HIREP to include energy generation in Maui County and transmission of that energy to O‘ahu by means of a submarine cable system, along with necessary energy infrastructure upgrades on O‘ahu. This action would implement the HIREP: Wind in support of the objectives of the Hawai‘i Clean Energy Initiative (HCEI).

DBEDT, on behalf of the State of Hawai‘i as its energy coordinator, has the lead role for the State in energy planning and policy initiatives to benefit the state economy and its inhabitants. As a continuation of its partnership with DOE in implementing the goals of the HCEI, DBEDT is participating in the preparation of the HIREP Wind EIS as a joint lead agency, ensuring that the evaluations and presentations contained in the HIREP Wind EIS will comply with the requirements of the State’s environmental review process set forth by Chapter 343 of the Hawai‘i Revised Statutes (HRS). The HIREP Wind EIS is also being developed in compliance with NEPA, as implemented by the Council on Environmental Quality (CEQ) Regulations (40 Code of Federal Regulations [CFR] Parts (§§)1500–1508 [1997]) and the DOE NEPA implementing procedures (10 CFR Part 1021).

Alternatives to be analyzed in the HIREP Wind EIS as described in the EISPN and presented at the scoping meetings include the proposed action and a no-action alternative. The proposed action would provide for the implementation of a program to develop up to 400 megawatts (MW) of wind energy on the Maui County islands of Maui, Lāna‘i, and/or Moloka‘i and transmission of that energy to O‘ahu. A range of wind development projects could be pursued under the proposed action and include varying power capacities and configurations among the islands, undersea cable corridors and routes, and locational criteria for landing sites. The HIREP Wind EIS would address scenarios under the proposed action that consider a programmatic approach to all wind energy deriving from a single island in Maui County, i.e., Lāna‘i, Moloka‘i, or Maui, and all wind energy deriving from a combination of generation on two or more of the islands in Maui County, along with associated programmatic approaches to cable corridors and routes and landing site locations in Maui County and on O‘ahu. After consideration of comments received during the public scoping process, alternatives to be carried through the HIREP Wind EIS will be determined.

As part of the HIREP Wind EIS evaluation, the wind energy development program would identify policies and best management practices (BMPs) to effectively and efficiently address the potential environmental impacts resulting from wind energy development activities and would identify minimum requirements for mitigation measures. If the programmatic approach is adopted, the identified BMPs would be applicable to future wind energy development projects on areas covered by the HIREP Wind EIS; however, any future tiered-off site-specific projects would be subject to a separate environmental review. Site-specific concerns and the development of additional mitigation measures would be addressed in project-specific environmental reviews, as required. This approach would also permit consideration of cultural landscapes over a broader range of areas rather than focusing and limiting cultural considerations on specific areas.

It is anticipated that the establishment of this program and any subsequent tiered-off project-specific proposed wind projects would have the potential for significant impacts to the human and/or natural environment. Therefore, DOE and DBEDT are preparing this EIS so that the analyses of, and the requirements placed upon subsequent, tiered project-specific wind project proposals are consistent and complete.

1.3 Scoping Period

The scoping period ran from December 14, 2010 through March 1, 2011. In addition to soliciting comments through public notifications, DOE and DBEDT hosted open house public scoping meetings on the islands of O‘ahu, Maui, Moloka‘i, and Lāna‘i to solicit comments for consideration in determining the scope of the HIREP Wind EIS. Open house public scoping meetings were held at the following dates, times, and locations:

- Tuesday, February 1, 2011, from 5:30 p.m.–9:00 p.m., McKinley High School (Cafeteria), Honolulu, O‘ahu
- Wednesday, February 2, 2011, from 5:30 p.m.–9:00 p.m., Pomaika‘i Elementary School (Cafeteria), Kahului, Maui
- Thursday, February 3, 2011 from 5:30 p.m.–9:00 p.m., Mitchell Pau‘ole Community Center (Cafeteria), Kaunakakai, Moloka‘i
- Saturday, February 5, 2011, from 9:30 a.m.–3:00 p.m., Lāna‘i High & Elementary School (Cafeteria), Lāna‘i City, Lāna‘i

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2.0 SCOPING MEETING NOTIFICATIONS

The scoping meetings were announced in multiple ways to notify the public and to encourage participation. In particular, DOE and DBEDT used six main methods to disseminate notice of the scoping meetings:

- Publication of an NOI to prepare the EIS in the *Federal Register* and a separate publication in the *Federal Register* announcing the public scoping meetings
- Publication of an NOI and EISPN in the OEQC's *The Environmental Notice*
- Publication of meeting notifications in local newspapers
- Notification on the program website (<http://www.hirep-wind.com>)
- Publication of meeting notifications in the Office of Hawaiian Affairs (OHA) *Ka Wai Ola*
- Other Avenues

Each of these methods is discussed in more detail below.

2.1 Federal Notice of Intent

The scoping process for the EIS began with the publication of an NOI in the *Federal Register* on December 14, 2010 (75 Federal Register [FR] 77859). The notice announced DOE and DBEDT's intent to prepare a programmatic EIS to assess the foreseeable environmental impacts that may arise from wind energy development under the HIREP. It described that Hawai'i proposes to facilitate the development of wind-generated renewable energy on one or more Maui County islands, transmission of that power to O'ahu, and the required improvements to the existing electric transmission infrastructure on O'ahu. The public scoping meetings were also announced with a publication in the *Federal Register* on January 12, 2011 (76 FR 75239). Copies of both the NOI and scoping meeting announcements are included in Appendix A.

2.2 State Notices of Availability of the EISPN and Scoping Meetings

An NOI was also published in the OEQC's *The Environmental Notice* on January 23, 2011. Similar to the NOI in the *Federal Register*, the notice announced DOE and DBEDT's intent to prepare a programmatic EIS to assess the foreseeable environmental impacts that may arise from wind energy development under the HIREP. The notice also listed the times, dates, and locations of the public scoping meetings, along with information on how to submit comments outside of the scoping meetings. A copy of the January 23, 2011, NOI is included in Appendix A.

2.3 Publication of Newspaper Notifications

The scoping meetings were announced in six local newspapers: *Honolulu Star Advertiser* (O'ahu), *Maui News* (Maui), *Moloka'i Dispatch* (Moloka'i), *The Garden Island* (Kaua'i), *Hawaii Tribune-Herald* (Hawai'i), and *West Hawaii Today* (Hawai'i). These notices were published two weeks prior to the scoping meetings. The dates of each notice are listed in Table 2-1. Copies of the newspaper notifications are included in Appendix B.

Table 2-1: Dates of Newspaper Notifications for Scoping Meetings

Island(s)	Newspaper	Dates of Publication
O‘ahu	<i>Honolulu Star Advertiser</i>	January 17, 2011
Maui	<i>Maui News</i>	January 18, 2011
Moloka‘i	<i>Moloka‘i Dispatch</i>	January 19, 2011
Kaua‘i	<i>The Garden Island</i>	January 19, 2011
Hawai‘i	<i>Hawaii Tribune-Herald</i>	January 19, 2011
Hawai‘i	<i>West Hawaii Today</i>	January 19, 2011

2.4 Website

A website for the HIREP Program (<http://www.hirep-wind.com>) has been developed for public access to all pertinent information regarding the project. The scoping meetings were announced on the website which included dates, times, locations with maps, and agendas.

2.5 Additional Publication in the OHA *Ka Wai Ola – The Living Water of OHA*

Ka Wai Ola – The Living Water of OHA is a free, monthly newspaper of OHA. *Ka Wai Ola* effectively serves the Hawaiian community by reporting on critical issues that impact not only Hawaiians, but the community at-large, and is available by subscription and posted online (<http://www.oha.org/kwo/>). The ‘Ianuali (January) 2011, Vol. 28, No. 1 edition of the *Ka Wai Ola* announced the intent of DBEDT and DOE to jointly prepare an EIS for the HIREP program and also presented the dates, locations, and times of the public scoping meetings. A copy of the article in *Ka Wai Ola* is included in Appendix C.

2.6 Other Avenues

In addition to the notification types presented above, the scoping meetings were announced via press releases, local television, Public Broadcasting Service (PBS), flyers on Moloka‘i and Lāna‘i, short news releases, and public service announcements that were developed by DOE and DBEDT and e-mailed/faxed to local print, television, and radio media venues.

3.0 SCOPING MEETINGS

3.1 Meeting Format

The scoping meetings included both informal as well as formal components. Attendees were welcomed at the entrance and asked to sign in.

The meetings commenced with an informal open house so that attendees could visit five information stations with informational banners and speak one-on-one with DOE, Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE), and DBEDT personnel at those stations. The stations included banners informing viewers of the NEPA and HRS Chapter 343 process; the proposed action; cultural resources, natural, and social resources to be addressed in the EIS; and avenues for public comment. Fact sheets were available to all attendees. The opportunity to speak one-on-one with a court reporter during this portion of the meeting was also made available for those individuals who wished to have oral comments recorded, but who did not wish to speak during the more formal part of the meeting.

After the open house, the more formal part of the meeting began with a brief presentation by DOE and DBEDT, during which attending government officials were introduced, a project overview was presented, an overview of the Federal and State EIS process was provided, and the more formal part of the meeting was opened. After the presentation, the public was given the opportunity to provide comments in front of the assembled group, with the oral comments recorded by a court reporter. Attendees were given the opportunity to sign up to speak prior to the meetings via the HIREP website. Attendees were also provided with the opportunity to sign up to speak at the meeting itself. Individuals who did not sign up to speak were also given the opportunity to speak following those individuals who did sign up. After all individuals who expressed the desire to do so had spoken once, individuals who wanted to speak again were given the opportunity. While speakers were initially asked to be mindful of time in consideration of others who wished to speak, no time limit was suggested or enforced during the second round of comments. After the last commentator had spoken, DOE and DBEDT provided closing remarks.

3.2 Exhibits

Banners displayed at each of the five information stations were:

- Banner 1 – Environmental Review Process
- Banner 2 – Public Comment
- Banner 3 – Programmatic EIS
- Banner 4 – Cultural Resources
- Banner 5 – Natural and Social Environments

Copies of the banners are included in Appendix D.

3.3 Fact Sheets

Two fact sheets were prepared as handouts and made available for the scoping meeting attendees. The fact sheets are titled as follows:

- Programmatic Environmental Impact Statement Hawai‘i Interisland Renewable Energy Program

- Q&A: The Hawai‘i Interisland Renewable Energy Program (HIREP)

Appendix E includes copies of these fact sheets.

3.4 Opportunities for Comment

DOE and DBEDT provided the public seven ways to comment during the scoping process:

1. Submit a completed written comment form at a scoping meeting or return the completed form at a later time by mail or fax
2. Individually dictate comments to the court reporter during the informal portion of a scoping meeting
3. Provide verbal testimony during the more formal portion of a scoping meeting, with those comments to be subsequently transcribed by the court reporter
4. Submit comments on the program’s website at <http://www.hirep-wind.com>
5. Email comments to hirep@dbedt.hawaii.gov
6. Fax comments to DBEDT
7. Send comments via U.S. mail to DBEDT

4.0 SUMMARY OF SCOPING MEETING ATTENDANCE AND SCOPING COMMENTS RECEIVED

Table 4-1 summarizes the number of meeting attendees and number of comments received and how they were received.

Table 4-1: Summary of Scoping Meeting Attendance and Comments Received at Meetings

	Meeting 1 O'ahu	Meeting 2 Maui	Meeting 3 Moloka'i	Meeting 4 Lāna'i
Estimated Attendance	100	50	110	75
Signed-in Attendance	73	37	73	59
Number of Written Comments Received at Meetings	3	2	5	2
Number of Speakers Providing Verbal Comments at Meetings	20	17	22	25

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5.0 CONTENT SUMMARY OF SCOPING COMMENTS RECEIVED

5.1 Summary Commentor Counts

Table 5-1 provides a summary of the number of comments received by the category of commentor type.

Table 5-1: Number of Commentors by Category

Category of Commentor	Number of Commentors	Appendix Location of Comments
Agencies and Elected Officials	19	F-1
NGOs and Private Entities	19	F-2
Individuals	128	F-3 and F-4
Speakers at Scoping Meetings	84	F-5

NGO=non-governmental organization

The input provided by many commentors included more than one comment. When broken down by individual comment and including all methods of commenting (e.g., U.S. mail, e-mail, fax, scoping meetings transcripts, etc.), the scoping process to date has generated 1,160 comments. This comment count includes comments received on the EISPN, with the deadline for those comments extended to 90 days (to March 1, 2011) as well.

Following a brief summary of scoping meeting comments, this section summarizes all scoping period comments, including those received at the scoping meetings, in two ways:

- In terms of subject matter, the comments concern 31 major resource areas. Section 5.2 presents a list of each resource area and the number of related comments received on it.
- The key issues and concerns reflected in the comments are summarized by resource area in Section 5.3.

5.2 Count of Scoping Comments by Resource Area

Resource Type	Number of Comments	Percentage (%)
1. Air Quality	2	0.2
2. Alternatives	79	6.8
3. Beneficial Impacts	3	0.3
4. Climate and Climate Change	5	0.4
5. Cultural and Historical Resources	81	6.9
6. Cumulative Impacts	11	0.9
7. Decommissioning/Disposal	34	2.9
8. EIS Approach	85	7.3
9. Environmental Justice	8	0.7
10. Geography, Geology, and Soils	19	1.6
11. Hazardous Materials and Unexploded Ordnance	10	0.9
12. Land and Submerged Land Use	19	1.6
13. Land Transportation	6	0.5
14. Marine and Benthic Biological Species and Habitat	52	4.5
15. Marine Transportation and Commerce	8	0.7

Resource Type	Number of Comments	Percentage (%)
16. Multiple Energy Sources Cable Use	7	0.6
17. Natural Hazards	5	0.4
18. Noise	17	1.5
19. Not Pertinent to the EIS/PN/Scoping	79	6.8
20. O'ahu Self-Sustainability/O'ahu-Centricity	40	3.4
21. Proposed Action	218	18.8
22. Public Safety and Health	1	0.1
23. Public Services Infrastructure and Utilities	33	2.8
24. Purpose and Need	49	4.2
25. Recreation	27	2.3
26. Scope of Analysis	59	5.1
27. Socio-economic (including subsistence)	67	5.8
28. Technology and Wind Infrastructure Design	40	3.4
29. Terrestrial and Coastal Biological Resources, Species, and Habitat	63	5.4
30. Visual	19	1.6
31. Water Resources and Drainage	14	1.2
TOTAL	1,160	100

5.3 Summary of Comments by Resource Type

This section provides a summary of comments by resource type, following the numbering system provided in Section 5.2.

5.3.1 Air Quality

Two comments addressed air quality. The comments centered on air emissions of criteria pollutants and a request for an air study that would include existing conditions, quantify emissions with implementation of the proposed action, specify emission sources, and specify mitigation measures.

5.3.2 Alternatives

There were 79 comments received on the lack of considering and analyzing alternative renewable energy technologies. Most of the comments centered on the concern that other renewable energy alternatives were not being considered and analyzed in the HIREP Wind EIS. Many attendees questioned why conservation, ocean thermal energy conversion (OTEC), geothermal, nuclear, solar, photovoltaic, offshore wind generation, airborne wind turbines, and nuclear power were not being considered. Several comments were received stating that besides alternative technologies, alternative sites and capacities should be analyzed. Many other comments cited concerns that the current approach is not in compliance with Federal or State laws, including NEPA. One commented that NEPA regulations “REQUIRE a study of alternatives, yet this one...studies only ‘Big Wind’ and ‘No action.’” Some expressed concern that the potential cable landing sites appear to be on military bases. Some commented that the landings were already a “done deal” and no other alternative landing sites have been or will be evaluated.

5.3.3 Beneficial Impacts

Three comments were received on beneficial impacts. During the island of Maui scoping meeting there was a comment that Maui has wind that is able to generate renewable energy to stop our dependency on oil and that “would ensure that wind generation is not discarded by the utility.” Other comments on beneficial impacts relayed the same support for wind on Maui.

5.3.4 Climate and Climate Change

Five comments were received regarding climate and climate change. One commentor requested a discussion in the EIS of how climate change will influence sensitive areas within the project area. Others wanted to see further discussion of the anticipated climate change benefits of wind energy, and the effects of general decrease of fossil fuel use throughout the state. Others questioned how the project impacts will be intensified by climate change and sea level rise.

5.3.5 Cultural and Historical Resources

There were 81 comments received on cultural and historical resources. This was a main topic at all four of the scoping meetings. The comments centered on preserving Native Hawaiian cultural practices and resources. Commentors wanted assurance that Act 50 would be followed and a comprehensive Cultural Impact Assessment (CIA) would be conducted and that it would include “a good faith effort to develop an informed understanding by identifying and mitigating cultural impacts …via outreach and consultation with organizations and individuals having such knowledge or expertise.” Commentors also wanted assurance that Section 106 consultation per the National Historic Preservation Act (NHPA) would be conducted. There was also significant concern regarding impacts to subsistence hunting, fishing, farming, and diving; access to cultural and religious resources; gathering medicine; traditional and customary Native Hawaiian practices; gathering rights; access to fishing and hunting locations; and visual landmarks.

5.3.6 Cumulative Impacts

Eleven comments were received on cumulative impacts. Commentors wanted assurance that cumulative impacts (short-, medium-, and long-term) along with direct and indirect impacts would be analyzed.

5.3.7 Decommissioning/Disposal

There were 34 comments related to the eventual disposal and/or decommissioning of future wind farm infrastructure, including removal or replacement of a future undersea energy transmission cable between islands. Numerous comments in this category questioned whether developers would be required to return a wind farm site to its pre-existing condition at the time of decommissioning and how that process will be financed and enforced. Other concerns with decommissioning centered on specific features of possible wind farm development, for example, “What legal guarantee is there that the turbines, concrete pads, and accessory structures will be removed after the (future) project ceases to operate?” Comparisons were made between the abandoned wind turbines at South Point on the Big Island and parallels to future wind farms constructed under the proposed program. There was mention of the U.S. Environmental Protection Agency (EPA) comments that future proponents “strive to address the full product lifecycle...” and that the “[draft] PEIS identify potential impacts and BMPs for minimizing impacts for repowering the wind farms.”

5.3.8 EIS Approach

There were 85 comments submitted during the scoping process related to the approach and framework taken for the EIS. “A protocol for communications, feedback, responses and follow-through will be critical.” Recommendations were made by one commentor that, “a programmatic agreement be used to institutionalize methods for monitoring and reporting on impacts and results over the lifetime of the project.” Since this HIREP Wind EIS is funded with public finding, some concerns centered on the level of transparency that the process needs to maintain specifically as it relates to making available various background studies that are cited in the EISPN. There were frequent comments about the level of specificity versus generality that would be incorporated into the EIS analyses and the subsequent EIS document, and what level is sufficient to satisfy NEPA;

e.g., “the EIS should be sufficiently specific to allow tiering on a project specific basis.” Another recurring theme was the concern over possible segmentation issues under NEPA (i.e., not analyzing a program in its entirety and therefore not capturing the full range of impacts). Questions were raised about deadlines for EIS completion due to American Recovery and Reinvestment Act funding for the project, and how that could affect the process. Timing and use of the EIS for future projects were concerns by other commentors such as: “How long are the EIS findings available for use by a project-specific EIS? That is, at what point has there been too much change—such as unforeseen cumulative impacts—to risk basing future decisions on it?” and “Will an adaptive management plan be used to evaluate and monitor impacted resources, as suggested by the EPA?” Stakeholder inclusion in the process was a concern with some commentors. There was a request to include acknowledged moku and kupuna from the program islands. Ethics reviews should be considered as noted by some commentors, to ensure that individuals “who have been employed by corporations with interests in the project” are identified. A final concern with some was the timing and appropriateness of current work being completed on a project-specific EIS for a wind farm on Lāna‘i, and concurrent completion of this HIREP Wind EIS, which is not analyzing specific projects.

5.3.9 Environmental Justice

Eight commentors expressly commented on environmental justice as applied in NEPA; “This proposed federal action will disproportionately impact Native Hawaiian communities on Lāna‘i and Moloka‘i to benefit urban Honolulu” was a paraphrased concern raised by environmental justice commentors.

5.3.10 Geography, Geology, and Soils

There were 19 unique comments received related to geography, geology, and soils. The size of the foundations and quantity of soil to be removed for placement of future turbines, multiplied by the quantity of turbines, was the most common concern. “Would construction mitigation measures be implemented to ensure less than significant impacts to near shore waters and island drainage?” and “Would road construction exacerbate erosion and alter drainage patterns?” were representative comments in this category.

5.3.11 Hazardous Materials and Unexploded Ordnance

Ten comments were submitted regarding hazardous materials in general, and impacts of some specific hazards in particular. “The document should identify projected hazardous waste types and volumes, and expected storage, disposal, and management plans.” Specific concerns included the presence of electromagnetic waves, “nuclear” (undefined connection to project), electromagnetic fields, and high voltage cables.

5.3.12 Land and Submerged Land Use

Nineteen comments were received during scoping in this category. A primary concern was the impacts from potential future wind farms on agricultural lands, conservation-zoned lands, submerged lands, and ceded lands. One commentor asked “Will use of agricultural lands compromise our ability to produce food?” Another suggested that coastal lands under the purview of the Coastal Zone Management program should be analyzed against future use by wind farms. It was requested by some commentors to measure possible wind projects against goals, policies, and regulations of applicable Federal, State and local land use and zoning designations to determine if wind developments would be consistent with land use regulations.

5.3.13 Land Transportation

Of the six comments received related to land transportation, most of the comments centered on the adequacy of the existing roads on Lāna‘i. Concerns regarding the ability to accommodate oversized construction equipments, wind turbine parts and associated machinery on secondary roads—unpaved, “jeep trails”—during construction, operations, and management during the program implementation period were raised. Additionally, questions regarding potential road improvements in the form of expansion and/or developing new routes were received.

5.3.14 Marine and Benthic Biological Species and Habitat

There were 52 comments that expressed concern for how the program implementation may affect different marine and benthic (fauna and flora living on or in the bottom of a sea) species at different stages in life. Numerous comments expressing concern for potential impacts associated with undersea cable(s) on the species and habitat were raised.

5.3.15 Marine Transportation and Commerce

All eight comments regarding marine transportation and commerce related to the Kaumalapau Harbor on Lāna‘i. Comments centered on the adequacy of the existing harbor to accommodate the program implementation during the construction phase. Commentors expressed concern that potential harbor improvements—likely related to expansion—may affect the weekly food and cargo barge service to Lāna‘i. Concerns regarding the actual logistics of bringing wind turbine parts from the sea to the land were also raised.

5.3.16 Multiple Energy Sources Cable Use

There were seven comments received regarding the use of the interisland cable for multiple energy sources. Comments regarding the need to maximize redundancy by installing multiple cables on multiple routes as a preventative measure were raised. This would mean that in the event that parts of the O‘ahu grid fail, power transfer would still take place via other cables connecting to the O‘ahu grid at different locations. Similarly, a comment addressed the need to create a single interisland grid so that in the event of a generation system goes down, another can pick up the load.

5.3.17 Natural Hazards

Five comments were received on natural hazards. Comments ranged from addressing natural hazard conditions relevant to the proposed action such as tsunamis, hurricanes, storm waves, sea level rise, floods, volcanic activity, landslides, and subsidence.

5.3.18 Noise

Seventeen comments regarding acoustical noise impacts were received. Commentors requested that comprehensive noise assessments be conducted to determine noise impacts on Lāna‘i City residents and on Moloka‘i residents adjacent to areas under program consideration, as well as on marine and benthic species and habitats. Various methods on conducting noise assessments were suggested, such as Schultz Community Annoyance, EPA day-night average sound level (commonly known as Ldn), Community Noise Equivalent Level (commonly referred to as CNEL), and the International Organization for Standardization 9613-2.

5.3.19 Not Pertinent to the EISPN/Scoping

There were 79 comments received during the scoping process that, while of interest in ascertaining general community concerns, did not directly pertain to the EISPN or the scoping process, or fit into parameters that would be analyzed in an EIS document. These, like all comments identified during

the scoping process, have been retained in their entirety for establishment of a complete EIS administrative record. Their value in the draft EIS process is in gaining perspective of general community sentiment as it exists today. There were comments submitted in response to a community benefit package recently proposed between a potential wind farm developer on Lāna‘i and the community. Many comments were predicated on project-specific analyses and not on analysis of the currently proposed program. Character commentary and disclosure of past activities of various possible wind farm developers and landowners were provided at many of the scoping meetings. The remaining comments can be categorized as strictly hypothetical. Some examples of topics from this category are concerns over how future wind farm proposals would be affected by the long-term change in oil price, political decisions not currently being contemplated, inclusion of Kaho‘olawe in the program, impacts from “homeland security issues,” (which could be interpreted to mean intentional destructive acts, the monetary gain anticipated for various wind farm developers, the selection process for the EIS contractor, applicability of pending wind farm lawsuits in other states, and requests for Hawaiian Electric Company financial statements.

5.3.20 O‘ahu Self-Sustainability/O‘ahu-Centricity

Forty comments were received pertaining to O‘ahu self-sustainability and a perception of what may be termed O‘ahu-centricity. The theme of the comments in this category was that O‘ahu should do more to conserve energy and reduce energy demands rather than going to other islands for their energy needs. A common sentiment was that neighbor islands would not receive any benefits but would bear the brunt of the energy infrastructure burden. Most commentors in this category agreed that if O‘ahu uses the power, the power should be produced on O‘ahu. It was said by many that resources from other islands should not be destroyed to help O‘ahu be sustainable. Many commentors questioned why wind farms are not being planned on O‘ahu as it would be more cost-effective. Other commentors suggested that if wind farms are going to be built on neighbor islands, the power produced should stay and help that island become 100% self sustainable.

5.3.21 Proposed Action

Of the 218 comments received regarding the proposed action, the majority centered on opposition to the proposed action. Standard examples are “To conclude, I’m against the wind farm and transmission cable,” “I am opposed to any development which would place at risk the resources we have,” and “No, we’re not for it.” Commentors questioned the funding including, for example, how much is it going to be; who is going to pay for future specific projects; and, was the legislature involved? Concern was that the taxpayers and ratepayers would end up paying for it. Numerous comments were also received regarding compensation, free electricity, improvements to schools, job opportunities, and a community compensation package. Several comments requested “what the military’s role is in this.” Some commentors were fearful, “We are scared that you’re going to come here and destroy our place,” and “everybody should be able to speak out, but everyone is afraid.” Several commentors expressed distrust, “Today I’m hearing promises that will never be kept.” Other concerns were received regarding a loss of a sense of place and back-up electricity when there is no wind. There were also some commentors that support the proposed action.

5.3.22 Public Safety and Health

One comment addressed public health and safety, expressing concern over health impacts associated with large-scale alternating current-direct current converter/inverter facilities.

5.3.23 Public Services Infrastructure and Utilities

Thirty-three comments were received regarding public services infrastructure and utilities. Several comments cited fire protection concerns and the additional costs for fire and police protection

services during construction and operation. Many commentors expressed concern about possible impacts to harbors, roads, and transmission lines. Others raised issues about water access, water sources, and water allocations. Several commentors asked how the financial risk of the proposed action would be allocated between electric companies and rate payers. One commentor asked what modifications are needed in existing generation units to accommodate wind, and the associated impacts. Several comments were received regarding what the roles of Maui and the Maui Electric Company would be if the proposed action were implemented. Multiple comments asked about back-up power facilities in case the cable fails or wind generation is low. Commentors asked why the supply of increased gas and oil needed for heavy equipment during construction. Several commentors were concerned with who would own the cable. It was suggested that the EIS include impacts of utility facility improvements and electrical grid enhancement.

5.3.24 Purpose and Need

There were 49 comments regarding the purpose and need. Several commentors cited the goals of the HCEI and wanted additional information, such as how energy demand will be decreased, what studies have been conducted and to please provide them, demonstrate why “[t]he island of O‘ahu ...does not contain sufficient renewable energy potential to meet HCEI’s goals,” to demonstrate why wind is currently the most commercially viable option, and how much “reserves” will be required to ensure uninterrupted power. Several commentors stressed the need for better conservation and efficiency planning and some noted that the goal of 70%, 30% through efficiency and 40% through renewable energy could be reversed; 40% through efficiency and 30% through renewable energy. Some commentors requested more information on DOE’s involvement “...the underlying purpose and need to which DOE is responding in proposing the alternatives...” Several commentors also requested that the National Renewable Energy Laboratory study, conducted by a contractor for DOE, of the financial implications of the project be made available to the public “as taxpayers we probably paid for that.” There were also comments to the effect that the HCEI is voluntary in that the Public Utilities Commission can issue waivers for both the utility’s performance and penalties.

5.3.25 Recreation

Twenty-seven comments were received regarding recreation. The majority of the comments centered over concerns regarding how the proposed action would affect fishing and hunting grounds. Many questioned if fishing would be allowed access along the shoreline of the project area or where the cable enters the ocean. One commentor asked how access to Ka‘a and Paoma‘i would be affected after construction, while several comments were received regarding how access to shorelines would be affected during construction and operation. Several comments expressed concern over impacts to other recreation activities such as hiking, camping, diving, and whale-watching.

5.3.26 Scope of Analysis

Fifty-nine comments were received concerning the scope of analysis for the EIS. Comments were wide ranging in this category. Many commentors requested more extensive studies regarding impacts to native animals, endangered species, and dry land forest areas. Others commented on the need to include a discussion of substations, transmission lines, converter stations, road improvements, and harbor improvements. One commentor requested a thorough analysis of impacted areas instead of “limited field studies,” as stated in the EISPN. Comments were received requesting that the EIS include a list of required permits and approvals. Other comments suggested the EIS compare the risk/cost of using the proposed project budget to build renewable energy on O‘ahu versus other islands. Another suggested a comparative analysis of the costs and impacts of wind energy versus the island’s continued use of fossil fuels. Multiple comments were received questioning the military’s involvement in the project and why cable landing sites are on military property. More background research was requested to include further information on experience gained on high voltage

transmission line projects around the world. For example, one commentor indicated that the project scope should include the provision of laying an interisland fiber-optic cable alongside the power cable so that both can be accomplished at one time reducing costs and impacts to the ocean floor. One comment suggested that the EIS expand the study of the ocean floor corridor to at least 500 meters to account for changes in the route due to unknown obstructions.

5.3.27 Socio-economics (including Subsistence)

There were 67 comments received concerning socio-economics. A bulk of the comments centered on what effects the proposed action would have on local employment opportunities. Many asked how many jobs would be created as a result of the proposed action. Others asked if training programs would be established to help local residents retain these jobs. Many commentors also asked if workers would be imported from O‘ahu instead of hiring people from the local communities. Many commentors said they would support the project if it would provide local job opportunities. Several comments were made about the impact to jobs if the proposed action is not implemented. Concerns were voiced over the social costs and benefits to local communities, specifically during the peak construction periods. Several commentors addressed the positive and negative impacts to many of the island’s rural lifestyles. Others questioned the proposed action’s long-term impacts to human communities and their social condition. One commentor asked how the Lāna‘i’s tourism market would be impacted. Many commentors also remarked about how the proposed action could affect their way of life and families’ subsistence. One commentor stated that the project will destroy the way of life and ahupua‘a¹ that his family depends on for subsistence (in regard to hunting and fishing); specifically Ka‘a and Paoma‘i.

Several commentors asked who is actually paying for the cable and for the associated maintenance.

5.3.28 Technology and Wind Infrastructure Design

Forty comments were received concerning technology and wind infrastructure design. Many commentors questioned the effectiveness of wind technology and questioned if it was the right choice for Hawai‘i. One commentor suggested the EIS explore smaller turbines such as those used in Japan. Many comments were received concerning the typical converter station acreage; number of temporary batch plants and how they will be managed; will fences and buffer zones be added to actual project footprints; and what will be the size of the cable trench. One commentor expressed concern about how large of an area per turbine will be subject to pre- and post-construction-related alterations. Other comments surrounded turbine maintenance and how it would be managed. Some commentors expressed concern over the size, nature, and extent of short-term impacts of clearing land for the wind farms. One commentor asked if temporary or permanent roads will be constructed. There were repeated comments about what will be done during times when wind is intermittent and energy needs are not met. One commentor suggested that the EIS research impacts of submarine power cables and include possible mitigation measures. It was also questioned if the proposed project facilities will follow green building and sustainable design practices.

5.3.29 Terrestrial and Coastal Biological Resources, Species, and Habitat

Sixty-three comments were received pertaining to terrestrial and coastal biological resources, species, and habitat. A large number of comments concerned impacts to birds and the increased potential for bird strikes near wind facilities, specifically with the endangered Hawaiian petrel,

¹ Ancient Hawaiian life was based around the ahupua‘a system of land management, which evolved to protect the upland water resources that sustained human life. A typical ahupua‘a, or land division, was wedge-shaped and extended from the mountains to the sea. As water flowed from the upland forest, down through the ahupua‘a, it passed from the wao akua, the realm of the gods, to the wao kanaka, the realm of man, where it sustained agriculture, aqua culture and other human uses. Water was a gift from the gods, and all Hawaiians took an active part in its use and conservation.

whose flight path could intercept with turbines. Many commentors also expressed concern over the disruption of bird flight paths due to the blinking lights on the turbines. It was suggested that all relevant avian species receive an impact study, and a comprehensive monitoring program to evaluate impacts to wildlife, especially bats and avian species, be developed. Multiple concerns were cited about the endangered Hawaiian monk seal, which is often seen hauling out at Polihua Beach, and other endangered, threatened, and special-status species. Many commentors were concerned about impacts to Lāna‘i’s Kanepu‘u Dryland Forest Preserve, high-elevation forests, and wetlands. Many comments centered on impacts to deer and other species that are hunted in the proposed construction areas. Several concerns were cited regarding plant habitats, including impacts to rare and endangered native plants during construction. Several comments addressed the increased possibility of invasive/alien species and negative impacts to native biodiversity. One commentor expressed concern over rare butterflies and moths, and other endangered insect populations.

5.3.30 Visual Resources

Nineteen comments were received regarding concerns over visual resources. Several commentors expressed concern over general aesthetic impacts to the island viewsheds and questioned how the wind turbines would be set against the island landscape. Many comments centered on the potential impacts the wind turbines could have on tourism and Hawai‘i’s visitor industry due to the visual impacts of the wind turbines. One commentor expressed concern over adverse effects on real estate values due to the visual impacts. One commentor suggested that the EIS conduct a cross section of Lana‘i island from east-northeast showing how many turbines would be visible from the city, along with an aerial view to assist the public with analyzing the visual impacts. Several comments addressed the need for a detailed cumulative effects study/model that includes visual resources.

5.3.31 Water Resources and Drainage

Fourteen comments were received regarding water resources and drainage issues. Many commentors were concerned about the quantity of water required for the temporary concrete batch plant, and what the water source would be for the mass quantities of cement needed for the project. Many comments centered around the current water shortage on many of the islands and expressed concerns over availability of a water supply for construction and operation, and the associated environmental impacts. Several comments questioned the potential draw on the high-level aquifers. Various commentors suggested the EIS study the current drainage patterns of the project area and discuss how they would be impacted/changed during project operations, along with coastal nonpoint pollution control, and runoff and leaching into the coastal waters.

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