

NEIL ABERCROMBIE  
GOVERNOR OF HAWAII



**STATE OF HAWAII**  
**DEPARTMENT OF LAND AND NATURAL RESOURCES**

STATE HISTORIC PRESERVATION DIVISION  
601 KAMOKILA BOULEVARD, ROOM 555  
KAPOLEI, HAWAII 96707

WILLIAM J. AILA, JR.  
INTERIM CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT

GUY KAULUKUKUI  
FIRST DEPUTY

WILLIAM M. TAM  
ACTING DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
BUREAU OF CONVEYANCES  
COMMISSION ON WATER RESOURCE MANAGEMENT  
CONSERVATION AND COASTAL LANDS  
CONSERVATION AND RESOURCES ENFORCEMENT  
ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAIHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

February 23, 2011

LOG NO: 2010.3913  
DOC NO: 1102MV18  
Archaeology

**MEMORANDUM**

**TO:** Charlene Unoki  
Assistant Administrator, Land Division  
P.O. Box 621  
Honolulu, HI 96809

**FROM:** Theresa Donham, Archaeology Branch Chief/Deputy SHPO 

**SUBJECT:** **Chapter 6E-42 Historic Preservation Review -  
Hawaii Interisland Renewable Energy Program  
Programmatic Environmental Assessment/Environmental  
Impact Statement Preparation Notice (EISPN)  
Islands of Lana'i, Moloka'i, Maui, O'ahu and Interisland Channels**

Thank you for the opportunity to review and comment on the aforementioned programmatic EISPN that was received by our office on December 15, 2010. This EISPN is designed to analyze the potential impacts of proposed wind farms on the Islands of Moloka'i, Lana'i and Maui, and transporting the power generated at these wind farms to O'ahu via undersea cables. The project seeks to generate 400 mega watts of renewable energy in order to help make Hawaii 70% renewable energy by 2030. We believe that this is an excellent goal, and we believe that sustainable energy is very important. However, we believe that a project of this magnitude with such a high potential for controversy should be undertaken with the utmost care, and the highest level of community consultation.

Because this is a programmatic EISPN, it does not include specific information on the proposed locations of the individual wind facilities on the islands. Rather, the EISPN indicates the course of action that will be followed during the planning and construction phases of this project. We believe that this approach is problematic because the actual impacts of the project remain unknown. We believe that the specific impacts on cultural and historic resources should be identified as early as possible in the planning process. Without specific information on the location of wind farms and interisland cables, we are in no position to evaluate the impacts and suitability of proposed mitigation measures. We believe that in order to adequately assess the potential impacts of this project the following should be undertaken:

1. Identify proposed locations and alternate locations for wind farm sites.
2. Conduct archaeological inventory surveys at preferred wind farm locations; determine project impacts and feasibility of proposed mitigation in consultation with affected communities and our office.
3. Prepare project area-specific cultural impact assessments.

Without these three crucial steps, the only general impact of this project that can be assessed is the fact that infrastructure will be built on Moloka'i, Lana'i and Maui and power will be sent to O'ahu. In a proposed community benefits package for the community of the Island of Lana'i: "Castle & Cooke and Hawaiian Electric recognize that, while the electricity will be transmitted to Oahu, the impact of construction and operation of the wind farm will be felt on Lanai, including on cultural and recreational resources, plants and wildlife and the people of the small island

Ms. Unoki  
February 23, 2011  
Page 2

community. Therefore, a community benefits package for Lanai is appropriate.” This indicates that the project proponents recognize that there will be substantial impacts to the historic and cultural landscapes of the rural neighbor island communities. The project proponents also indicate that a community benefits package is an appropriate means of mitigating these impacts. However, these proponents have communicated their desire to SHPD that the benefit package should be kept separate from the regulatory compliance conditions. We believe that if the community benefits are separate from the compliance conditions there will be no mandate for the benefit agreement to be carried out. We believe that there will be a significant impact on the historic and cultural landscapes of Moloka‘i, Lana‘i and Maui, and we believe that appropriate mitigation measures should be agreed upon through community consultation, and implemented as a condition of historic preservation and environmental protection law compliance.

Please contact Mike Vitousek at (808) 692-8029 or [Michael.Vitousek@Hawaii.gov](mailto:Michael.Vitousek@Hawaii.gov) if you have any questions or concerns regarding this memo.

CC:

Director  
Office of Environmental Quality Control  
235 South Beretania Street, Room 702  
Honolulu, HI 96813

AECOM  
1001 Bishop Street, 16th floor,  
Honolulu, HI 96813