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To: Allen G. Kam, Esq., AICP  
Hawaii Interisland Renewable Energy Program  
Strategic Industries Division

From: Jesse K. Souki, Interim Director 

Subject: Response to Environmental Impact Statement Preparation Notice for  
Hawai'i Interisland Renewable Energy Program (HIREP): Wind Programmatic  
Environmental Impact Statement, Islands of O'ahu, Maui, Moloka'i, and Lāna'i

Thank you for sending the Office of Planning (OP) an Environmental Impact Statement Preparation Notice (EISPN) for the development of a framework for assessing the environmental impacts of proposed project-specific wind projects (Project).

The Office has the following comments regarding the Draft Environmental Impact Statement (DEIS) to be prepared.

### General Comments

1. **Development of alternatives.** The EISPN discusses two alternatives: one is the proposed action and the other is no-action. Pursuant to Section 11-200-17, Hawai'i Administrative Rules (HAR), it is necessary for the draft EIS to explore alternatives. The Programmatic EIS should discuss alternative options for the Project as a whole, and provide a framework for identifying and discussing alternative options for individual projects—in terms of landfall and land-based facility locations, routes/transmission corridors, alternative wind energy designs, and alternative scales—to enable a robust evaluation of the relative impacts and benefits of the preferred alternative to other viable alternatives.

2. **Discussion of relationship to Hawai'i Coastal Zone Management (CZM) Act, Chapter 205A, HRS.** The draft EIS needs to discuss the relationship of the proposed wind energy program to the objectives and policies contained in the CZM Act, as well as identify how the individual projects will support CZM objectives and policies, as they apply to project facilities proposed within the State's coastal zone. Section 205A-1, HRS, defines the coastal zone as all lands of the State and the area extending seaward from the shoreline to the limit of the State's police power and management authority, including the United States territorial sea. The

proposed interisland wind energy program will involve CZM Special Management Areas and shoreline areas, so it is critical that the EIS discuss how the proposed Project will balance the competing values of economic development and preservation of coastal resources.

Coastal non-point pollution control. The draft EIS should discuss the potential mitigation measures to be implemented by the Project as a whole, as well as by individual projects to the extent that reasonably foreseeable impacts can be determined, to address impacts on coastal zone resources. Mitigation may include stormwater management such as low impact development (LID) measures to protect the quality of groundwater, surface, coastal, and marine waters. OP recommends the use of best management practices (BMP) that promote onsite infiltration and minimize runoff from storm events. More information on stormwater BMPs can be found at <http://hawaii.gov/dbedt/czm/initiative/lid.php>.

Coastal and other hazards. The draft EIS should identify and describe any hazard conditions that are relevant to the Project, such as potential risk or harm from tsunamis, hurricane, wind, storm wave, sea level rise, flood, erosion, volcanic activity, earthquake, landslide, subsidence, and point and nonpoint source pollution. The draft EIS should discuss the potential harm to coastal and marine resources from the Project due to a natural hazard event. The draft EIS should also describe the measures that are proposed to mitigate any hazard impacts, and measures to be taken to mitigate the potential economic and infrastructural impacts that might occur from the loss of power due to damage to the proposed energy facilities from these natural hazards.

Coastal-dependent uses and beach and shoreline protection. The draft EIS should discuss what measures will be taken to mitigate impacts of the Project and Project infrastructure on coastal lands, including beach protection and access.

3. **Plans, policies, and permits required.** Although required permits and approvals will be determined by project-specific proposed wind projects, we suggest the draft EIS provide a list of required permits or approvals with related authorities and agencies to help fulfill its purpose of providing a framework for project-specific applicants. This ensures the draft EIS meets the content requirements of Chapter 11-200, HAR. It would be helpful if the draft EIS could identify the specific permits/approvals that might be required under various project conditions. In addition, the draft EIS should discuss compatibility with land use plans and policies, including the Hawai'i State Planning Act.

4. **Agricultural lands.** The draft EIS should discuss how the proposed Project will be evaluated with respect to their impact on agricultural lands. In particular, the draft EIS should discuss the impact of the proposed Project on agricultural use of the land.

5. **Environmental Health Hazards.** The draft EIS should discuss the potential for the Project to generate hazardous materials or release possible contaminants to the air, soil, or water, as well as measures to be taken to protect environmental and public health and safety from potential releases. The draft EIS should discuss how adjacent users will be protected from potential environmental health hazards generated by the Project.

The draft EIS should identify and discuss any potential health and environmental threats due to contamination from the proposed use of the site, including baseline findings from Phase I or Phase II environmental site assessments conducted at the site. OP recommends that an ASTM 1527-05 Phase I Environmental Site Assessment or equivalent be conducted for the Master Plan area, if one has not already been conducted. Should there be contaminants of concern identified at the Project's sites, OP recommends that the applicant consult with the State Department of Health's (DOH) Hazard Evaluation and Emergency Response Office as to measures to be taken to address possible or actual contamination at the site.

6. **Cultural, Archaeological, and Historic Resources.** The draft EIS will need to comply with Act 50, Session Laws of Hawai'i 2000, and address any impacts on historic, archaeological, and cultural resources. Cultural resources and cultural practices, including visual landmarks, if applicable, need to be identified within the Project footprint. The draft EIS should also discuss the impact of the proposed Project on identified cultural resources and practices, alternatives considered, and proposed mitigation measures. The Office of Environmental Quality Control has developed guidelines for the preparation for cultural impact statements and has posted lists of cultural assessment providers for each island, which are both available at <http://oeqc.doh.hawaii.gov/Shared%20Documents/Forms/AllItems.aspx?RootFolder=%2fShared%20Documents%2fEnvironmental%5fAssessment%5fPrepKit%2fCultural%5fImpact%5fAssessments&View=%7bC0C5C897%2d3066%2d4821%2d864E%2d36FB3D77F5D5%7d>.

7. **Biota.** The draft EIS should assess the impacts of the Project on flora and fauna, including invertebrates that are found on or within proximity of Project sites or that frequent the waters around transmission corridors. Flora and fauna of concern should not be limited to listed threatened or endangered species or those under consideration for listing. The applicant should also consult with the Database Manager at the Hawai'i Biodiversity and Mapping Program, Center for Conservation Research and Training, University of Hawai'i, (808) 956-8094, as to the potential for the presence of rare species in the Project area. The draft EIS should discuss measures to be taken to protect rare, threatened or endangered species or ecosystems of concern. Consideration should be given to conducting field observations in wet/dry seasons, and during seasonal conditions that reflect migratory patterns of land-based and marine species to capture the fullest range of flora and fauna.

8. **Sustainability of Project sites and facilities.** The draft EIS should identify whether or not the Project's facilities will be encouraged to follow green building and sustainable

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design practices. The Office recommends that the draft EIS process be used as a means to identify and incorporate sustainable design and development practices, including green building practices, in project design, siting, and construction of Project facilities. The draft EIS should also identify what measures might be considered and implemented in Project and component design to encourage the recycling or reuse of materials from decommissioned Project components.

The Office of Planning will provide additional comments at the draft EIS stage when more specifics are available.

Thank you for the opportunity to comment. We look forward to receiving and reviewing the draft EIS.

c: Michelle Mason, AECOM