



100 Kahelu Avenue
Mililani, Hawai'i 96789-3997
P.O. Box 898900
Mililani, Hawai'i 96789-8900
O'ahu: (808) 548-4811 • Fax (808) 548-2980
Lana'i: (808) 565-3000 • Fax (808) 565-3312

Harry A. Saunders
President

February 28, 2011

Mr. Allen Kam, EIS Manager
Renewable Energy Office, State Energy Office
Department of Business, Economic Development
and Tourism
State of Hawai'i
P. O. Box 2359
Honolulu, Hawai'i 96804

Dear Mr. Kam:

Subject: ***EIS Preparation Notice, Hawai'i Interisland Energy Program: Wind***

In response to the Programmatic Environmental Impact Statement Preparation Notice issued for the subject project, we provide the following comments:

1. We concur with the many public comments expressed that the Programmatic EIS should include a thorough analysis of other commercially available renewable energy alternatives and their associated impacts.
2. Many public comments were made at the scoping meetings with reference to the wind farm on Lāna'i taking up one-fourth of the island. On Page 2-10 of the EISPN, statement is made that a wind farm of up to 400 MW capacity may encompass an area of more than 15,000 acres. Please be informed that our current plans call for no more than 12,800 acres even with the maximum 400 MW wind farm. Please reflect this in the forthcoming Draft EIS.
3. Many comments from the Neighbor Islands were also raised regarding how they derive little benefits from the project and how much O'ahu stands to gain. The EIS should include a good discussion of how the entire State benefits from reducing our dependence on imported oil and reducing the billions of dollars being exported out-of-State to stay on oil.
4. The role and basis for inclusion of the island of Maui should be clarified. There was no proposal submitted to HECO for any Big Wind projects to O'ahu from Maui.

Mr. Allen Kam
February 28, 2011
Page Two

5. The project description mentions only High Voltage Direct Current (HVDC) cable for the undersea transmission of electrical energy. The potential use of Alternating Current (AC) cable for transmission between the islands should be described, along with a thorough assessment of the associated benefits and impacts. On a related note, we believe the statement on Page 3-26 that HVDC cables produce stronger electromagnetic fields than AC cables is incorrect.
6. The EIS should include a discussion and assessment of the potential for pumped hydroelectric storage of power generated from the wind farms, either on O'ahu or the islands of origin, including the potential benefits and impacts.
7. We support conducting a comprehensive Cultural Impact Assessment for inclusion in the Programmatic EIS. In consideration of our historical role on the island of Lāna'i, we wish to request being consulted for this study.
8. The general cable routing and landing areas are shown on Figure 2. We presume this is based on findings from the University of Hawai'i's School of Ocean and Earth Science and Technology survey. The analysis leading to the selection of cable routing and landing areas on this map should be described in detail, including other alternative corridors and landing areas that were considered and their associated impacts.
9. A summary of National Renewable Energy Laboratory's O'ahu Wind Integration and Transmission Study is referenced and publicly available online. Given the importance of this study, all associated studies leading to this report should also be made available to the public.
10. On Page 3-56, the acreage of Lāna'i is incorrectly stated as 3,193 acres. Page 3-57 references Castle & Cooke ownership of 2,745 acres on Moloka'i—we do not own any lands on Moloka'i.

Thank you for the opportunity to comment. We look forward to your response and the forthcoming Draft EIS.

Sincerely,

CASTLE & COOKE HAWAI'I



Harry A. Saunders
President