

Comments on the HIREP EIS/EA Preliminary Notice
Submitted by Robin Kaye
February 21, 2011

The Draft EIS needs to address the following questions, concerns and critical issues:

1. Federal and State environmental impact laws REQUIRE a study of alternatives, yet this one (*Hawaii Island Renewable Energy Project*) studies only “Big Wind” and “No action.” Nowhere in the document does it suggest a study of wave, nuclear, geothermal, OTEC (ocean thermal energy conversion), solar or any other renewable energy source. When Senator Baker asked the Department of Energy representative at the 1.11.11 Senate Information Briefing whether this was required in the EIS, he said “Yes.” Not having those studies is unacceptable.
2. No where in the document are these four absolutely critical issues addressed:
 - Who will own the interisland cable? Originally, the State said that it would own it. At a recent Legislative Information Briefing session, the state indicated that it is considering a shared ownership between the State and a private investor -- such as Castle & Cooke. More recently, HECO’s bills (SB367 and HB1176) set up a “regulatory scheme” [their words] that would have a private developer own the cable but make it easy for HECO to purchase it. Were that the case, a privately-held company could own both the supply and the delivery system for ten percent of O’ahu’s electricity, a situation that HECO originally indicated was not acceptable.
 - What will it cost? Originally estimated at one billion dollars (\$1,000,000,000), some estimates expect it to double, while DBEDT now talks about lowering the cost. With a state deficit of \$850 million dollars, we need to know the costs of this project.
 - How will it be paid for? Will the Legislature be asked to authorize bond funds? Will it be funded directly by taxpayers and ratepayers? Again, HECO’s recently introduced legislation passes on all development costs to a private developer, but then shifts all risk and all costs to Hawaii’s ratepayers. How much will the Federal government provide in loans and/or grants?
 - What is the military’s (currently the largest single HECO customer on O’ahu, and owner of one of the two proposed cable landing sites) role in this project? This issue has been continuously been raised but never answered. The draft EIS needs to address this with unaccustomed transparency.
3. How will this process avoid an inherent conflict of interest in having DBEDT be both the applicant for this EIS AND the accepting authority? Who will balance the community’s needs against the State’s needs?
4. The EIS/EA PN refers to “decommissioning.” How far will the developer be required to “decommission?” Will they be required to remove the 1100 cubic yards of cement in each foundation, and those mammoth 60’ diameter holes be re-filled and re-planted?

5. The draft EIS/EA must study the reduction of demand (e.g., conservation) by the Oahu users of this power -- O'ahu businesses, residents and military. How will the 30% HCEI goal of conservation be achieved?
6. The draft EIS must clarify that the goals of the Hawaii Clean Energy Initiative are voluntary, in that the PUC may waive utility performance as outlined in HRS §269-92.
7. There have been, as reported at the recent Legislative Information Briefing, a number of very relevant reports prepared but not released to the public, including a National Renewable Energy Lab study, done by Booz-Allen, of the financial implications of this project. When will these be made available to the public -- the taxpayers who paid for these studies? All taxpayer funded reports relative to this project must be released immediately.
8. The draft EIS must include an analysis of the impacts on the Kanepu'u Dry Land Forest Preserve.
9. Why does the EIS/EA PN suggest only "limited field studies" of the impacted area? It is unacceptable that this study should rely primarily on literature review rather than a thorough analysis of the area, an area known to be populated with Hawaiian cultural and archeological sites. A major omission in this section relates to the documentation of "Traditional Cultural Properties" and "Cultural Attachment" of native peoples and historic residents to the project area lands/resources.
10. If Molokai is unable or chooses not to participate in this industrial wind power plant, will the project still happen? Will the State contract with only one private supplier of neighbor island wind?
11. How does Maui fit within Big Wind?
12. What is the impact of runoff on our reefs?
13. Will any Hydro power project be part of this wind power plant project?
14. I would like to receive copies of transcripts from all 4 scoping meetings as early as possible. There is no good reason to hold them until the draft EIS is published.