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RE: Comments on Auwahi Wind Farm (DRAFT- EIS)

Aloha,

These comments are intended to apply to any HRS 343 Environmental review, NEPA requirements, Conservation District Use permitting, Special Management Area Use, Maui County Special Use, Request for Use of State Lands, Incidental Take Permit, Incidental Take License, Use and Occupancy Agreement, County Right-of-Way Approval, Various Grading/Building and Other Construction Permits.

For purposes of background, I earned my B.A. degree in zoology from the University of California at Los Angeles, and earned my Master of Science in Forestry, with emphasis on Wildlife Management from Stephen F. Austin State University at Nacogdoches, Texas. I currently teach environmental science for the University of Phoenix. Although I do not consider myself an expert on Hawaiian flora and fauna, my comments are based on generally accepted environmental knowledge.

To begin, I strongly support development of alternative, sustainable energy resources on Maui so that we will not have to continue burning fossil fuels. Nevertheless, I feel it is necessary to make sure that any new alternative energy project: a) be sensitive to Maui's unique vegetation and wildlife; and b) provide benefits to electricity consumers. Therefore, the following are comments that should be considered in revising the DEIS and preparing the Final-EIS.

Rather than repeat other input you have already received, I will state that I agree with and support comments made by Dick Mayer's letter of April 6, 2011, in particular concerning his sections on "Water", "Traffic" and associated sections, and "Solid Waste".

**Impacts from geothermal projects in the same area:** There is a proposal for geothermal energy production on the Ulupalakua Ranch. The potential study and / or production sites should be identified and any impacts to this proposal considered.

**Endangered plant species:** A number of "Special Status" and "Rare" plant species have been identified as occurring or potentially occurring within the project area. On page ES-6 it is stated that, "Listed plant species will be flagged, fenced, and avoided during construction." yet on page 3-46 the wording is different, "Because there is some flexibility in the installation of generator-tie line pole locations, it is *assumed* that these occurrences would be flagged and avoided during construction by fencing them." (*Emphasis added.*) I recommend a stronger commitment to the identification, isolation and protection of all special status and rare Hawaiian plants.

**Hawaiian hoary bat nesting habitat:** There are a number of "listed" animal species identified in the project area. Page ES-7 includes, "Species-appropriate mitigation measures will be implemented to compensate and provide a *net conservation benefit* for impacts to listed species." (*Emphasis added.*) Yet, on page 3-73 shows "take levels" to be from 9 to 35 bats dependent upon different tiered-assumptions. This cannot be considered a "net conservation benefit".

This writer can accept certain risks to wildlife in wind farm developments and most of these have been identified with some reasonable attempt at mitigation. Concerning the Hawaiian hoary bat, there are some comments that are particularly disturbing. The first is, "...systematic monitoring has not been conducted on Maui to understand the size of its local population. It is difficult to assess the effect that take of Hawaiian hoary bats resulting from the proposed Project may have on the local population of this species because the size of this population is not known."

Without understanding the current native population of the Hawaiian hoary bat, it is not possible to accurately assess the impact of any species loss on that population. A concept known as "minimum viable population" has been studied in species and found to impact the ability for a species to breed and maintain its population. Without understanding the

current population size or the level of risk of the local population the conclusion, "Project-related take is anticipated to be relatively low and unlikely to result in a significant impact on the overall population of the Hawaiian hoary bat" cannot be certain.

This risk is exacerbated by the following statement on page 3-71, "To minimize potential impacts to the Hawaiian hoary bat, woody plants greater than 4.5 meters (15 feet) tall would not be removed or trimmed between May 15 and August 15 throughout the installation and ongoing maintenance of the Project structures." Although delaying the taking of these actual, or potential, roosting sites helps any current bat breeding, it destroys those sites for future breeding seasons. It is suggested that greater consideration and care be given to marking and preserving potential roosting sites as described in the Hawaii State DLNR paper:

<http://www.state.hi.us/dlnr/dofaw/cwcs/files/NAAT%20final%20CWCS/Chapters/Terrestrial%20Fact%20Sheets/hawaiian%20hoary%20bat%20NAAT%20final%20!.pdf>

lest a lack of consideration contribute to the potential extinction of this species on Maui.

**Hoapili Trail:** The Hoapili Trail is described as, "Walking the Hoapili Trail (King's Highway) is a trek into the recent history of Maui. For most of the journey, the trail is handcut through one of the island's most recent lava flows. Looking straight ahead, one could imagine walking on the moon. Looking mauka (inland), you are treated to a view of the green foothills of Haleakala. The makai (seaward) view, the pacific ocean with secluded beaches along the way and ruins of old Hawaiian structures. This hike makes it easy to imagine the world of the Hawaiians nearly 200 years ago." (<http://www.mauivacation.net/hoapili.html>). Both visual and noise impacts are described in the draft EIS and although the visual sighting of the WTG's might not be of concern to drivers on the "Upcountry Pi'ilani Highway, this is probably not the case for hikers seeking to find views with minimal human impact.

The same can be said about the noise level. Estimates provided a noise level of 45 – 50 dBA for approximately one mile along the trail (Figures 3.11-1, and 2). This noise level is compared (page 3-134) to be between a quiet residential area and "Light auto traffic (100 feet)."

Neither of these impacts should be considered as critical to the project, but there is concern over the lack of attention to mitigation. There is the option of using the Siemens SWT-3.0-101 turbine as shown in Figure 3.11-3, but even this option subjects hikers in the area to these noise levels during the hike.

It is suggested that the applicant consider other forms of mitigation to offset impacts with no easy solution. This falls under "Social Justice" and can come in many forms including improved recreational opportunities in this or other areas or other benefits for the community.

**Hurricanes and tropical storms:** The draft EIS considers the risk of an impact to the site from a hurricane to be small and based on the information presented, I believe this is a logical conclusion. As a result the discussion of "pitching blades" (page 3-28) and the MET tower focus on wind speeds of 55 to 80 MPH. However, the operational phase of the site is projected to be at least 20 years. With this in mind mitigation should be *forward looking* rather than historical.



Many speculate that recent extreme weather events are caused by climate change. Although short-term weather events cannot be tied to climate change long-term modeling by some does show an increased possibility of hurricanes affecting Hawaii:

<http://www.agu.org/pubs/crossref/2010/2010GL045124.shtml>

and

<http://journals.ametsoc.org/doi/abs/10.1175/2010JCLI3666.1>

The Auwahi Wind Farm proposal addresses the reduction of pollutants that contribute to climate change and it is suggested that another assessment of the project based on potential environmental hazards be made.

**Social Justice:** Any change to the physical or biological state of an area has impacts. A project that helps Maui reduce its dependence on carbon-based energy production will have positive impacts. Regardless of effort, there will be negative impacts that will occur. It is important to consider other mitigations that can offset negative impacts that result from an inability to create mitigation, or from impacts that occur even when mitigations are put in place.

Governor Abercrombie recently stated, concerning the “Big Wind” project proposed for Lanai and Molokai, “The wind projects must proceed in a way that produces benefits for the people and communities of those islands. These community benefits should help move the islands toward sustainable futures of their own.... I expect those benefits to be substantial...”

It is suggested that consideration be made to include the Governor’s philosophy for the Auwahi Wind Farm as well. This could include offsets to the impacts mentioned on the Hoapili trail, coordination of a training program with the Sustainable Living Institute of Maui for the training of the operators of the facility when it becomes operational, and ways to move Maui “toward a sustainable” future of its own.

Thank you for your consideration of these comments.

Respectfully,



Ron Montgomery

Cc:

Kula Community Association  
Upcountry Sustainability  
Sustainable Living Institute of Maui