

State of Hawai'i
DEPARTMENT OF LAND AND NATURAL RESOURCES
Division of Forestry and Wildlife (DOFAW)
Honolulu, Hawaii 96813

July 2, 2014

Endangered Species Recovery Committee
State of Hawaii
Honolulu, Hawaii

Committee Members:

SUBJECT: Na Pua Makani wind energy project in Kahuku on the north shore of O'ahu.

BACKGROUND:

A pre-application for the Na Pua Makani Wind Power 25 MW project was originally submitted in 2009 by West Wind Works, LLC (West Wind). Circumstances caused progress on the project to come to a stop in 2010. West Wind subsequently revitalized the project in 2011 as a 20.7 MW, nine turbine facility located in Kahuku Agricultural Park. A pre-application was filed and a draft Habitat Conservation Plan (HCP) was submitted to DOFAW in May 2011. Champlin Hawaii Wind Holdings, LLC (a subsidiary of Champlin / GEI Wind Holdings, LLC) acquired the Project in 2012 from West Wind, and formed Na Pua Makani Power Partners, LLC (Na Pua Makani). Following acquisition of the West Wind project, Na Pua Makani expanded the project area, and proposed an 8-10 turbine array with up to 25 MW generation capacity.

The proposed Project would be located on state land leased from State of Hawaii's Department of Land and Natural Resources (DLNR) and from the Malaekahana Hui West, LLC. The Project is proposed to begin construction in the first quarter of 2015 and begin commercial operation by December 2015.

Currently, Na Pua Makani is pursuing an ITL through the development of an HCP – in consultation with USFWS and DOFAW staff – for incidental take associated with wind farm operations.

ANALYSIS

DOFAW understands and supports the State of Hawaii's commitment to achieve 70% clean energy production by the year 2030. Generation of energy via wind farms is renewable technology that reduces greenhouse gas emissions and water use. DOFAW also understands the potential impacts of wind energy projects on listed species in the State of Hawaii. The development of an HCP with Na Pua Makani should promote listed

species recovery and will help to avoid and minimize potential impacts to the species, as well as mitigate for those impacts that cannot be avoided, while contributing to the achievement of Hawaii's renewable energy goals.

A temporary license as part of a habitat conservation plan may be issued to allow take that would otherwise be prohibited if the take is incidental to, and not the purpose of, the carrying out of an otherwise lawful activity. Any take authorization that may be issued would need to come from both State and Federal wildlife agencies in order to be valid. Pursuant to HRS 195D-21(b)(1) an HCP can be developed if it is determined that:

- (A) The plan will further the purposes of HRS Chapter 195D by protecting, maintaining, restoring, or enhancing identified ecosystems, natural communities, or habitat types upon which endangered, threatened, proposed, or candidate species depend within the area covered by the plan;
- (B) The plan will increase the likelihood of recovery of the endangered or threatened species that are the focus of the plan; and
- (C) The plan satisfies all the requirements of HRS Chapter 195D.

Respectfully Submitted,



Lisa J. Hadway, Administrator
Division of Forestry and Wildlife