

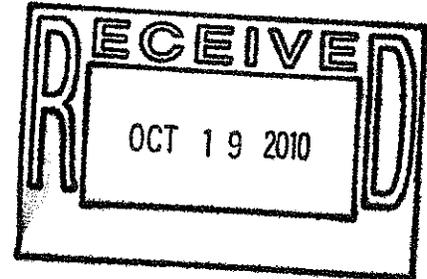
**DEPARTMENT OF BUSINESS,
ECONOMIC DEVELOPMENT & TOURISM**

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October 15, 2010

Management Plan Review Coordinator
Hawaiian Islands Humpback Whale National Marine Sanctuary
6600 Kalaniana'ole Highway, Suite 301
Honolulu, Hawai'i 96825

Re: Hawaiian Islands Humpback Whale National Marine Sanctuary Management Plan

Dear Management Plan Review Coordinator:

The Department of Business, Economic Development, and Tourism ("DBEDT") is currently working with the United States Department of Energy, and Hawaiian Electric Company to develop the Interisland Wind Project. The Interisland Wind Project proposes to send up to 400 megawatts of wind-generated electricity in Maui County via an undersea cable to O'ahu. The project would help to achieve the Hawai'i Clean Energy Initiative (HCEI) goal of 70% clean energy for electricity and ground transportation by 2030.

There are multiple routes being assessed for placement of the cable on the ocean floor between the islands of O'ahu, Moloka'i, Lāna'i and Maui, many of which pass through the Hawaiian Islands Humpback National Marine Sanctuary (the "Sanctuary"). As per our understanding, there is no current permitting structure that allows for laying undersea electric cables transmitting power from renewable resources within the federal waters portion of the Sanctuary. Some of the potential routes would require that a segment of the cable be laid within such areas. DBEDT requests that in the implementation of the new Management Plan that such activities within federal waters of the Sanctuary be explicitly addressed.

DBEDT requests that the Management Plan either consider provisions for laying such transmission cables within federal waters of the Sanctuary or that the Sanctuary administration consider the promulgation of regulations for the issuance of permits within federal waters of the Sanctuary pursuant to the authority granted it in §922.48 of Title 15, Chapter 12 of the Code of Federal Regulations, "National Marine Sanctuary Permits – Application Procedures and Issuance Criteria." By establishing rules that would allow for the laying of the undersea cable in federal

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waters of the Sanctuary, the Sanctuary would ensure agency compliance and would assist in minimizing potential impacts to ocean and marine environment within the Sanctuary.

The Hawai'i State Energy Office greatly appreciates the opportunity to comment on this matter.

Best regards,

A handwritten signature in black ink, appearing to read 'Theodore A. Peck', written in a cursive style.

Theodore A. Peck
Energy Program Administrator