



United States Department of the Interior
FISH AND WILDLIFE SERVICE
Pacific Islands Fish and Wildlife Office
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Honolulu, Hawai'i 96850



State of Hawai'i
DEPARTMENT OF LAND AND
NATURAL RESOURCES
Division of Forestry and Wildlife
1151 Punchbowl Street, Room 325
Honolulu, Hawai'i 96813

In Reply Refer To:
2022-0042876

June 23, 2022

Mr. Denis Ebrill
Vice President, Vacation Ownership – HA
Kaua'i Blue, Inc
dba Sheraton Kaua'i
c/o Mr. Reginald David
2440 Ho'onani Road
Kōloa, Hawai'i 96756

Subject: Comments on the Sheraton Kaua'i's Implementation of the Kaua'i Seabird
Habitat Conservation Plan (Incidental Take Permit TE74394D-0/Incidental Take
License ITL-26)

Dear Mr. Ebrill:

This letter serves for the Hawai'i Department of Land and Natural Resources, Division of Forestry and Wildlife (DOFAW) and the U.S. Fish and Wildlife Service (Service), collectively referred to herein as the "Resource Agencies", to provide comments and recommendations on Sheraton Kaua'i's (Sheraton) implementation of the Kaua'i Seabird Habitat Conservation Plan (KSHCP) (Incidental Take Permit TE74394D-0/Incidental Take License ITL-26). This feedback is compiled from agency review of your 2021 annual report, your March 4, 2022, annual participant meeting, and the March 14, 2022, review by the Hawai'i Endangered Species Recovery Committee. Our comments have been organized by category pursuant to the biological goals and objectives of the KSHCP and are stated below.

Facility Lighting: KSHCP Biological Objective 1.A.

Avoid and minimize the impacts of the taking of Covered Seabirds due to light attraction by removing or turning off lighting and altering light structure and function by the end of Year 1, as specified in PIPs.

As described in your Participant Inclusion Plan (PIP) Item 4: Description of Lighting Standards, Sheraton conducts pre-seabird season lighting audits by a seabird biologist and necessary tweaks to the lighting are completed prior to the start of the seabird season each year.

Your 2020 annual report stated that the unshielded down lights were removed in the courtyard to comply with comments left by the public review process. Otherwise, the resort did not make any changes to the lighting system; and you followed the seabirds lighting rules. The Sheraton was closed on April 8, 2020 and remained closed through the season. You reported that the lights at your restaurants and fitness centers were turned off; and all buildings that you could dim were reduced by 30 percent intensity, however, a very large number of lights were completely dark during the 2020 seabird season.

Your annual report states that there were no lighting or facility changes during 2021 season.

Agency Comments or Recommendations:

The resource agencies acknowledge your efforts to continue to reduce lighting impacts in compliance with the KSHCP lighting guidelines. Please amend your report to include the dates of the pre-seabird season lighting audits and the dates, if any, of subsequent modifications that were made each year. We acknowledge you made efforts to reduce lighting impacts to seabirds; however, it appears that your lights do not sufficiently avoid impacts to all Covered Species, as evident from the unauthorized take of sea turtles (honu) in 2020. You state that “a very large number of lights were completely dark during the 2020 seabird season,” but you have not described any minimization of lights during the honu nesting season. We recommend you conduct a lighting assessment as soon as possible and minimize all lighting that is visible from the beach to prevent future light attraction of honu. If you anticipate your lights will not avoid, take of honu we recommend you work with us to request an amendment to seek authorized take of listed honu under section 9 of the Endangered Species Act and HRS §195D.

Predator Control: KSHCP Biological Objective 1.B.

Minimize mortality of Covered Seabirds downed due to light attraction by implementing actions to reduce presence of free-roaming seabird predators such as cats and dogs at Participant facilities, as specified in PIPs.

Your 2020 annual report states that resort staff conducted predator surveys 24 hours a day while on patrol and called your vendor as needed. During the 2020 seabird season, the predator control vendor set six traps which were checked daily for a total of 546 trap nights. You also stated that Aloha Termite Kaua‘i was contracted to trap and remove feral cats once a month, year-round and that results were reported for the number of animals removed.

Your 2021 annual report states that the resort staff conducted predator surveys while on patrol and called on your vendor as needed. During the 2021 seabird season, the predator control vendor set eight traps which were checked daily for a total of 728 trap nights; no cats were caught.

You have stated that the Sheraton Resort removed and controlled loose predatory animals at the facility prior to and during the seabird fledging season in accordance with its PIP Item 8 and in 2021, the Sheraton switched vendors to another used by other KSHCP participants. We understand that the resort biologist met with the pest control company prior to the start of the

seabird season to consult and provide direction on the number of traps and site-specific locations to best catch predators. During the seabird season, Sheraton resort staff helped the predator control company improve trapping implementation by informing them of when and where predators were identified.

Your ITP Special Terms and Conditions §L and ITL Special Conditions §G states the following:

In accordance with HCP, including sections 5.3.2, 6.2.2, 6.6.1.2, 6.8.2 and 6.8.3, the Permittee, in coordination with the Service shall within one year of the effective date of this permit, provide for the Service's review and approval of the following:

- i. Implementation plan for predator monitoring and removal for Covered Property(ies), including effort and efficacy monitoring.*
- ii. If this condition is not met, the Service may immediately suspend the permit.*

We recommend you submit your draft Implementation Plan for our review and as soon as possible.

Agency Comments or Recommendations:

While you state that predator surveys were conducted year-round, the summary you provided does not include any survey results; therefore, the information you have provided is insufficient to conclude that predator control is adequate or effective.

You state that staff coordinated with the contractor to improve trapping and inform of predator locations. You also state that the contractor conducted daily surveys and had eight traps in daily use. You have provided no survey data or results to demonstrate how many cats are on the property, only a statement that no cats were caught. The contractor hired by DOFAW for the searcher efficiency trials (SET) noted cats on the property multiple times during the season.

Please provide the to the agencies and amend your report to include the results of daily predator searches, which can be evaluated along with capture data to determine efficacy of your predator control program. We also recommend in 2022 and in future years, you conduct daily seabird predator monitoring for inclusion in your annual reporting. The daily predator monitoring data should be collected prior to the start of trapping, and again at the start through the end of the fallout season to demonstrate effective control or reduction of predators prior to fallout with birds on the ground. As we discussed, resource agencies require the needed information to evaluate the efficacy of the predator control program as well as provide any other recommendations for future predator control implementation.

As discussed in your meeting with the agencies and by the ESRC, the discovery rate for any ITP/ITL is dependent on both effective seabird searching and effective predator control. An effective predator control program ensures that any seabirds that are downed can persist on the landscape in order for searchers to find and retrieve birds for rehabilitation. In the absence of a highly effective predator control program, it is more likely that birds will be depredated rather

than recovered. Therefore, a highly effective predator control program will result in better implementation of the Biological Objectives of the KSHCP.

Staff Training: Biological Objective 1.C.

Minimize mortality of Covered Seabirds downed due to light attraction by conducting annual Worker Seabird Awareness and Response Training (WSART), as specified in PIPs.

As stated in your annual report, the Sheraton Resort conducted four in-person trainings to 233 staff members between July 2021 to September 2021 that included a PowerPoint presentation and a review of the fact sheet, KSHCP Downed Wildlife Protocol, and the Incident Documentation and Reporting Form.

Agency Comments or Recommendations:

We have reviewed your 2021 Sheraton Training PowerPoint and note that there is no description of how to find downed birds that may seek shelter. We do, however, acknowledge that your PIP “Appendix E: Sheraton Kaua‘i Resort – Seabird Standard Operating Procedures and Recovery Protocols (Bird Recover Procedure)” does state what to do if a bird is found. We recommend your PowerPoint materials show photos of downed birds and their likely hiding places instead of birds that are flying over the ocean. Having actual photos representative of what trained searchers might encounter is more effective than providing birds flying or rafting in their oceanic habitat. We recommend these photos use examples of birds that are under cover (e.g. vegetation, crevices, supplies, valet carts, etc.) that will help to quickly replicate a search image for seabird searchers to identify), which will result in more effective training.

We recognize that you have provided training to an extensive number of staff members; however, that does not mean that all staff will actively search for downed seabirds. Instead, this at best, indicates that staff members will opportunistically report that they have observed a seabird while performing other primary duties. Our agency meeting with the Sheraton indicated that searchers conduct searches at 8:00am when the staff comes onsite. Searching for downed seabirds require a dedicated searcher that will actively look for birds under small crevices, vegetation, and areas that birds may shelter in. This requires these seabird searchers to search at appropriate times as outlined in the KSHCP (Section 5.3.4.1 Recovery of Downed Seabirds) as well as getting down on their hands and knees with a flashlight to look for birds. It is an extensive effort that staff members may not have time to conduct given that they have other primary duties during their work schedule. In our agency meeting, we reminded you that searches need to be conducted prior to sunrise to ensure better discovery of downed birds. We also recommend you use dedicated seabird searches to meet this objective.

In your annual reporting of the summary of training efforts you do not indicate any honu nesting training. While we understand that your PowerPoint training provides some information regarding honu, you also do not describe what searchers should be looking for when conducting honu nest monitoring. You reported that you provided this training in July, August, and September of 2021. While we understand these trainings are provided in advance of the seabird

fallout season, this time period is not consistent with when beach monitoring should occur to search for evidence of nesting honu. We recommend you provide your honu training immediately prior to the nesting season (prior to May 1) and your downed seabird training prior to the seabird fallout season (prior to September 15) to keep personnel reminded of when each season begins. We recommend that it is targeted for specific species so personnel do not become complacent in their efforts.

We coordinated with your staff to conduct an in-person training and when we arrived on site the head of security, LeeJay Aki, stated she was unaware we were coming to the property that day. Nevertheless, she was more than accommodating and made time for us, as well as gathered as many staff as possible to attend our training. On May 26, 2022, the agencies conducted an in-person training at the Sheraton for three of your staff. We provided a monitoring data sheet specific for the Sheraton to document daily data collections as well as provided an electronic copy. We also notified you that we have developed a mobile application, or app, that your staff can use to collect honu nesting data from a mobile device. We appreciate LeeJay's efforts to attend the training and encourage your staff to reach out to the resource agencies with any questions regarding the training.

The results of the SET indicate that your current training program is insufficient. Your method of training delivery (e.g., video, in-person, educational materials, demonstrations) states you provided PowerPoint presentations; however, we are unable to determine if these were in-person and on-the-ground demonstrations or only presentations via a computer screen. We suggest having in-person sessions with on-the-ground training for all personnel responsible for conducting monitoring for honu and for downed seabirds to implement the monitoring and reporting procedures as required more effectively by the terms and conditions of the ITP/ITL. As discussed, we expect you to coordinate with the agencies for onsite training to show the searchers where birds are likely to hide and how to best detect them. We also recommend that you periodically test your personnel who are conducting the monitoring to ensure they are effectively implementing the protocols as outlined in your training program.

Additionally, as noted above, there were various instances where a free roaming cat was observed on your property. You have also indicated that in our March 4, 2022, meeting that during your lighting audit you documented a cat and notified the predator control facility, but the same cat was documented during the DOFAW contractor property visits. This indicates that training is needed to educate the staff and ensure that free roaming predators are prohibited as stated in your PIP (Table 4: Seabird Light Attraction Minimization Measures Considered). It also indicates that training is needed to report on any predators that found on the property, as well as a mechanism for reporting any dogs, cats, and rodents. Again, we emphasize that opportunistic reporting of predators should occur, but the routine predator surveys should be conducted by a dedicated predator surveyor.

While reporting is a subject of your training presentation, in both 2020 and 2021, there were issues with Sheraton not providing timely take reports to the agencies, as well as late and inaccurate submission of your annual reports. We also notified you in our meeting that the "Finding and Reporting Turtles on the Beach" (slide 12 of your PowerPoint) should be updated and reviewed annually to reflect the current contact information.

Outreach: Biological Objective 1.D.

Minimize mortality of Covered Seabirds downed due to light attraction by implementing seabird awareness outreach to the public, guests, and customers at Participant facilities as specified in PIPs.

As stated in your “Summary of Outreach Efforts”, between July 15 to December 15 of 2021, Sheraton posters and flyers were posted around the property for guests and residents. In addition, coloring books were made available upon order and offered to arrival owners.

Agency Comments or Recommendations:

While we recognize that Sheraton cannot expect its guests to comply with the search conditions of the ITP/ITL under the KSHCP, it was documented during the SET that very few decoys in the open were discovered. One of your two live downed seabirds were discovered and reported by a guest. This downed Newell’s shearwater was found at the bottom of an empty pool. We believe there is some outreach and education that is occurring to have resulted in the live bird being reported; we also recognize that the bird was in an obvious location. Only one decoy was reported out of twenty-one that were deployed. Other decoys that were not reported from multiple open locations included open lawns and on paved walkways. We would have anticipated that having a good outreach and education program may have informed guests that birds are important to find; and we also anticipated successful programs may have encouraged guests to approach the decoy to see the tags which then may have prompted guests and owners to report the decoys. We can assume that having a good outreach and education program would only help to further minimize impacts of the Covered Species; therefore, we recommend these outreach efforts be better implemented to assist with your efforts to educate the public and potentially have them assist in reporting of downed seabirds.

Your PIP “Appendix D: Guest Seabird Conservation Brochure” indicated that it was currently under development. Please provide a copy of the education brochure for our review and comments.

Additionally, as noted above, there were various instances where a free roaming cat was observed on your property. We recommend having signage that informs your guests, visitors, and staff to educate them that feeding is prohibited.

Minimization and Avoidance of Light Attraction for Turtles: Biological Objective 1.E.

Avoid and minimize honu hatchling disorientation due to lighting at beachfront facilities by implementing best lighting practices as specified in PIPs, and protecting any nests at facilities via shielding as needed.

As stated in the Section 9.2 of the KSHCP, “It is anticipated that Participants with beach front properties can completely avoid future incidental take of honu. Currently there is no provision for requested incidental take of honu in proposed Participant PIPs, and the minimization and mitigation measures outlined in Section 9.4 will be implemented as described to ensure that there

is zero take of the species.” Unlike the Covered Seabirds, which are attracted to lighting that is visible from above, honu are attracted to lighting that is visible from below. Because of this, lighting that is visible from the ground can unintentionally attract honu from their nesting beaches.

Your PIP states that the beach fronting the resort (located fronting the lū‘au garden and pool) is searched a minimum of eight times a day by security officers and in the event a nest is discovered, the resort would immediately contact the Service and follow our standard Hawai‘i protocols for protecting a nest. You also state that there has never been a nest recorded on the beach since the hotel has been in operation. No information regarding avoidance and minimizations measures for honu are stated.

Agency Comments or Recommendations:

Although it was anticipated that “...there is zero take of (honu),” there has already been unauthorized take of honu. Additionally, there was no immediate notification to the agencies that there were honu nests on the beach fronting the Sheraton.

On July 1, 2020, we reached out to Reginald “Reggie” David, Sheraton contracted biologist, to notify you that we received several emails from DOFAW Kaua‘i staff regarding a new nest in front of the Sheraton. We reminded you that per Section 9.5 of the KSHCP, “All sea turtle activity should be reported immediately to the agencies and all potential nest sites shall be protected immediately.” We requested you inform us of any actions that had taken place to minimize impacts on the nests. On July 6, 2020, Reggie called the Service to notify the agencies that the Sheraton had a staff member monitoring the nest daily. They had initially cordoned off the area and called DOFAW who put them in touch with DOCARE. The nest was laid on the night of July 24 about 10–15 feet from the water. Reggie stated that the Sheraton was advised to take everything down around the nest and continue monitoring it.

On September 8, 2020, the agencies received notification from DAR that there were honu hatchlings in the pool at the resort and emailed Reggie to request more information, as well as all actions that were taken since our last discussion regarding the nest. On September 23, 2020, The Service emailed Reggie to follow up on the information that was requested on September 8th. Reggie called to inform the agencies that he received incident reports from the Sheraton. On September 24, 2020, Reggie provided the following information:

On June 25, 2020, your head of security called the DAR hotline to report a honu basking in a pit she dug last near the water. The Sheraton security roped the area off and DAR reported that they had checked the nest and so much sand had moved and been removed with the nest pit low on the beach; they presumed it had been washed out by the King tides that had occurred. However, on August 30, 2020, the Sheraton head of security called DAR to report three hatchlings found in the pools. DAR advised the head of security to retrieve and release the hatchlings at the shoreline. DAR visited the beach on the evening of the August 31 and September 1 to see if there were any more signs of emergence but could not find it due to the tide. DAR returned on September 11, 2020,

with five other individuals to excavate 2 honu pits but did not find anything inside the chambers.

Your 2020 annual report that was provided in 2021, initially did not report on the actions that had occurred resulting in the unauthorized take of honu. You also did not accurately report on the total take of the species at the annual ESRC meeting that was held in March 2021. Although we understand that there were no honu nests in 2021, we recommend your annual report provide information to state whether if there was or was no nesting activity during the season.

As stated above, on May 26, 2022, the agencies visited your facility to provide a honu nesting training and provided data sheets and an option to collect data using an app that the Service had developed. We have not received a request to use the app, and therefore, expect that all data collection will be conducted manually.

We note that the honu nesting is typically May 15 through December 15 each year. This is not the same as the seabird fledgling season, which is September 15 through December 15. Therefore, your honu nest monitoring must begin no later than May 15, with notification and protection of any discovered nests, and preparation for minimizing lighting at your resort in advance of when the hatchlings are anticipated to emerge.

As required by the KSHCP (Section 9.5), there is not anticipated to be any incidental take of honu requested as monitoring and nest protection measures described in Section 9.5 will be implemented by all Participants with visible lights on beachfront property. However, if honu hatchling disorientation does occur, the following protocols should be followed:

- The Department of Aquatic Resources (DAR) should be contacted immediately so the hatchling turtles are only handled by staff or volunteers permitted to handle endangered species.
- Disoriented hatchlings should be protected from foot or vehicle traffic, predation, and handling.
-

All Participant staff should be trained on Standard Operating Procedures (SOPs) with regard to hatchling disorientation, to minimize take impacts.”

To report all honu activity, please immediately call to the Kaua‘i Hotline, staffed by DLNR and NOAA 24/7: 808-651-7668. Also send an email with the pertinent information to:

Jamie Thomson, NOAA: jamie.thomton@noaa.gov

Mimi Olry, DLNR: mimi.olry@hawaii.gov

Heather Ylitalo-Ward, DLNR: heather.a.ylitalo-ward@hawaii.gov

Once the response staff have been notified via hotline and email, send a detailed report to the following:

DOFAW downed wildlife email: dofaw.hcp@hawaii.gov

Kate Cullison, DOFAW: Katherine.cullison@hawaii.gov

Jiny Kim, Service: Jiny_kim@fws.gov

Lindsay Young, Prime Contractor: lindsay@pacifcrimconservation.org

Honu are attracted to and disoriented by lighting that is visible from their nesting beach. Therefore, we recommend you immediately conduct a lighting assessment specific to honu to identify lighting that can be further minimized to avoid unauthorized take of honu should you find a nest. Also, honu remain faithful to their natal beaches; therefore, it is reasonable to expect nesting and hatching events at the beach fronting your resort to continue in the future.

As you are aware, your current permit does not authorize take of honu. If you are unable to avoid violation of section 9 of the Endangered Species Act and HRS §195D we request you contact our office immediately to amend the ITP/ITL to include incidental take of honu.

Recovery of Downed Seabirds / Searcher Efficiency Trials: Biological Objective 1.F.

Minimize mortality by implementing recovery and release of Covered Seabirds downed due to light attraction through the Save Our Shearwaters (SOS) program or other certified rehabilitation facility.

Recovery of Downed Seabirds:

You have stated that the Sheraton Resort General Manager and Director of Security is responsible for overseeing the seabird protocols, bird searches and recovery, record keeping, and reporting. During the 2021 seabird season, Joseph Kaneakua was the Security manager and LeeJay Aki was the supervisor of the primary responders. At the end of the season, she was promoted to Security Manager and is now the primary contact and person responsible for managing the seabird program and searches on the property. She is also the person responsible for ensuring honu nest monitoring occurs on the beach fronting the Sheraton. You state that the entire staff was responsible for searching their respective work areas during work hours; there were approximately 250 daily employees during the 2021 fledging season. Twelve Security officers, one Supervisor, were also responsible for patrolling the property for downed seabirds, honu nest sites, and predators during the seabird season.

You stated that the entire built upon portion of the property is inspected each day year-round. Searches were conducted throughout the day, 7 days a week. During the seabird season, four property searches per officer per shift (twelve search efforts per night). Search times varied but included within 1 hour before sunrise (6–7am) and 3–4 hours after sunset (9–11pm) per KSHCP requirements. Additional searcher assistance was provided by Nokaioi Landscaping in the mornings. This season two Newell's shearwaters were found on the site on the nights of October 21, and 27, 2021. Additional searches were conducted during the 2021 seabird fledging season in response to the agencies' discovery rate validation testing and consultation with the resort's seabird biologist.

Table 1. Summary of Sheraton’s Total and Annual Permitted Take of Covered Species.

	NESH		HAPE		BANP	
	Lethal	Non-lethal	Lethal	Non-lethal	Lethal	Non-lethal
30-Year Permit Term	81	64	1	1	3	3
2020	0	0	0	0	0	0
2021	2.2	1.8	0	0	0	0
Total Take	2.2	1.8	0	0	0	0

Agency Comments or Recommendations:

While your report addendum disclosed the discovery of two downed Newell’s shearwaters, your reports base form identified annual take as zero. Your report addendum states the seabird take as occurring October 21 and 27, yet your summary table states October 26 and 27. Please resubmit all annual reports to correct all discrepancies and omissions. Please be advised that annual reports for incidental take ITP/ITL are expected to be complete and accurate. We also request that in the future for each fallout bird that was sent to Save Our Shearwaters (SOS), please report the intake date, release date, SOS summary of treatment, and release condition.

The search effort you describe is exhaustive. However, the poor performance as evidenced in the SET indicates that the current search methods are not effective. There is no evidence that staff searched beyond the area of the main lobby.

The agencies request coordination prior to upcoming seabird searcher training. Training should be improved and include on-the-ground traversing of the property to provide information to trainees on locations where birds may hide in the different structural and vegetative features of the resort. Training should also include practice searches using decoys. Seabird searches should be documented thoroughly on datasheets, an app, or similar data collection method.

The annual report base form requests a discussion of the efficacy of current self-monitoring protocols. In your corresponding addendum item 12, you state to see Attachment A for more details. Please provide Attachment A.

Searcher Efficiency Trials:

Pursuant to KSHCP 6.2.2.1(3), a discovery rate validation program was developed and implemented October 27–December 15, within the 2021 seabird fallout season. The SET was meant to demonstrate the appropriateness of each Participant’s stated Discovery Rate. Discovery Rates are based on two participant-controlled variables: searcher efficiency at finding downed birds, and effective predator control to ensure that birds remain alive to be found. The Sheraton’s permitted discovery rate, which requires both effective seabird searching and effective predator control, is 50 percent. In the SET trial, Sheraton staff discovered and reported one decoy, for a searcher efficiency rate of 5 percent.

Table 2. Results of the Searcher Efficiency Trial at the Sheraton.

	Deployed	Reported	Searcher Success rate
Sheraton Po'ipū	#	#	%
Open	12	1	8%
Partial Cover	2	0	0%
Full Cover	7	0	0%
Total	21	1	5%

Agency Comments or Recommendations:

The SET results for Sheraton were among the lowest of the tested KSHCP participants. This property is not being formally searched for downed seabirds, or if it is searched, that search is highly ineffective. While at least two live seabirds were found this season, only 1 decoy was reported of 21 that were deployed. The live birds that were found were in obvious locations. One was in an emptied swimming pool and was found by a guest. The other was under a luggage cart beside the bell desk, coincidentally just about 60 feet from, and on the same sidewalk as, the location of the only decoy from the study that was reported. Decoys were not reported even from multiple open locations such as open lawns and on paved walkways. As such, there is no evidence that any dedicated searching was implemented at all throughout the season. Significant adaptive management is needed to address the lack of adequate seabird search efforts.

Sheraton must improve efforts to search for downed seabirds both in the open and under cover. Given the amount of the property covered by difficult to search vegetation, searchers should also be expected to search into and under vegetation. We advise keeping potentially concealing vegetation and groundcover trimmed as much as possible through the seabird season to reduce the amount of available cover and help searchers detect more birds.

Searches specifically focused on finding downed birds should be conducted. Preferably those searches should be done with people particularly invested in good outcomes for the birds. Asking for volunteers from staff members might help find those that show the most interest. They should then be allocated the time and equipment (good flashlights) necessary to conduct a good search. The use of a camera or mirror on a pole may also increase the effectiveness of the search under vehicles in the large parking area.


As noted by the ESRC, the use of detector dogs would greatly improve the resort's searcher efficiency and provide a higher level of confidence that downed seabirds are being recovered for rehabilitation. While dogs are significantly more likely to find hidden birds than humans, there is nevertheless variation in skill, therefore if a dog program is utilized, we request you ask for a validation result for each dog and handler team.

In summary, Sheraton needs to collect and report predator survey data and efficacy, submit timely and accurate annual reports, improve honu monitoring and response, and demonstrably improve training and seabird searcher efficiency. The agencies request that Sheraton

communicate with us often as you implement these changes, and we offer coordinated assistance throughout.

We look forward to continuing to work with you to ensure the success of the KSHCP. If you have concerns being unable to fully implement the terms and conditions of your ITP/ITL please reach out to us to schedule a meeting to discuss the next steps. Please feel free to contact us should you have any questions regarding our letter.

Sincerely,
**AARON
NADIG**

 Digitally signed by
AARON NADIG
Date: 2022.06.23
10:46:48 -10'00'

Island Team Manager
O'ahu, Kaua'i, Northwestern Hawaiian
Islands, and American Samoa

Lainie Berry

Wildlife Program Manager