



Shaping the future for birds

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Kaua'i Island Utility Cooperative
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Re: Kauai Island Utility Cooperative Draft Long-Term Habitat Conservation Plan, Kauai, HI

To whom it may concern:

Thank you for the opportunity to comment on the KIUC Draft Long-term HCP. American Bird Conservancy is a 501(c)(3), non-profit membership organization whose mission is to conserve native birds and their habitats, working throughout the Americas to safeguard the rarest bird species, restore habitats, and reduce threats. For more than 15 years, ABC has been actively working to conserve Hawaiian forest birds and seabirds, and reduce threats to these imperiled species.

After our review of the HCP, we focus our comments on two main topics: minimization, and monitoring.

Minimization

We believe more detail on implemented minimization is required to enable the public to evaluate KIUC's effort to minimize take. While traveling on roads around Kauai I have observed varying degrees of minimization effort on power line spans. For example, I have seen power line spans with diverters on some wires and not others on the same span. Further, there are some spans where diverters are deployed yet static wires are still in place. This is reinforced by data in Appendix 4B, which clearly shows some spans have diverters without static line removal.

There is concern that spans with diverters and static lines without diverters will lead birds to avoid the transmission/distribution lines but fly into the static lines. A similar scenario could exist when only some of the transmission/distribution lines in a span have diverters. It is clear that diverters on all wires in a span and static wire removal on all spans is desirable and anything less than this amount of minimization calls into question the estimated reduction of collisions used in the HCP document. All spans with anything less than full diverters and no static line should be monitored annually to confirm level of minimization is being achieved.

In addition, in section 6.4.1.5 the HCP states that additional minimization will be implemented if required. This additional minimization should be required as part of the HCP regardless of future monitoring. It is possible to estimate collision risk at all spans on the island. A strategic prioritization should be done and a plan to systematically implement minimization across these sites, beginning with highest risk, over the period of the HCP should be included. All minimization should be complete, i.e. with diverters on all lines and static wire removed. No spans should have diverters with static wire in place. Clear justification should be provided by KIUC for any individual spans not minimized.

This request for additional effort to minimize take is supported by the significant impact KIUC infrastructure has had on the Newell's Shearwater and Hawaiian Petrel. Powerline collisions are recognized as a leading cause of mortality for both species and a significant contributor to the reported declines of 92% and 78% for these species between 1993 and 2013, respectively. Doing some simple calculations from data in the HCP, this would equate to the loss of 145,000 pairs of Newell's Shearwaters and 31,000 pairs of Hawaiian Petrels during this time period.¹ Comparing this level of loss, much of which is unquestionably due to KIUC infrastructure, with the proposed outcome at the end of the 50 year HCP term, which proposes to create 3,049 pairs of Newell's Shearwaters, and 1,494 pairs of Hawaiian Petrel, the inadequacy of the HCP becomes clear. This is further highlighted by the fact that KIUC is requesting a permit to take 35,236 Newell's Shearwaters (5X the number KIUC proposes to create) and 21,196 Hawaiian Petrels (7X the KIUC proposes to create). At the very least, KIUC should increase their effort and minimize future collisions by 90% rather than the HCP's reported goal of 65.3%.

Monitoring

It is acknowledged that the numbers quoted above and in footnote 1 are inconsistent with some population estimates. The 157,000 pairs of Newell's Shearwaters calculated from numbers provided in the HCP is considerably higher than the approximately 40,000 pairs estimated in Griesemer and Holmes, 2011². This reinforces the point that population estimates are difficult for both species, as evidenced by information in the HCP and other relevant publications. It is therefore reasonable to expect an increased level of monitoring to confirm outcomes predicted in the HCP are indeed being met.

Monitoring is discussed in section 6.4.1.2. ABC believes take should be monitored annually throughout the permit term. An option to reduce costs might include analyzing acoustic data

¹ NESH: 2021 population of 12,570 pairs from Tbl 5F-3. Assuming stable numbers since 2013, and a 92% decline this would equal a population of 157,000 pairs in 1993. HAPE: 2021 population of 8,736 pairs from Tbl 5E-3. Assuming stable numbers since 2013, and a 78% decline, this would equal a population of 40,000 pairs in 1993.

² PCSU Technical Report 176, Newell's Shearwater population modeling for Habitat Conservation Plan and Recovery Planning



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on 2 and then 5-year schedules, however, acoustic data should be collected every year. If triggers are then met, these already collected data could be analyzed, rather than waiting to collect more data and conducting analysis in the future. This would provide a quicker understanding of any issues.

ABC is involved in projects that implement both predator control and colony monitoring for the three listed seabird species breeding on Kauai. The plan to reduce colony monitoring to less than annual frequency will negatively impact efficacy of the predator control. The information collected during colony monitoring is critical to adaptively managing predator control efforts within the breeding season to respond to predation events and predator incursions into breeding areas. Colony monitoring should be maintained on an annual cycle and coordinated closely with all predator control activities.

Regards,

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