

INSTALLATION Pacific Missile Range Facility		CODE N4F	COMMAND NAVFAC Hawaii	DATE 2/6/2023
REVIEWER NAME PMRF Public Works & Environmental		REVIEWER E-MAIL ADDRESS jessica.l.behnke.civ@us.navy.mil ; brooke.a.mcfarland.civ@us.navy.mil		REVIEWER TELEPHONE NUMBER (808) 335-4064
PROJECT TITLE AND LOCATION Review: Draft Habitat Conservation Plan Agency/Organization: KIUC				SUBMITTAL
				X
NO.	PAGE/LINE NUMBER	COMMENTS (Make general comments after specific comments)		REVIEW ACTION (And Reasons Where Significant)

1.	5C-19; Section 5C.4.1, Table 3	Are streetlights at PMRF still operated by KIUC? Figure 2-1. Pg 60	
2.	2-3	Distribution line strike of Newell's shearwater (NESH) occurred at PMRF in 2022 on KIUC-owned distribution wires that are about 25 ft high; likely Hawaiian petrel (HAPE) distribution line strike as well (secondarily to light attraction). What paper is this determination based on? While distribution line collisions are unlikely, should they be included in some low number? Should they not be considered for waterbirds separately?	
3.	2-11	Distribution Wires at Low Heights or Owned by Others: See previous comment.	
4.	Page ES-8 Objective 4.1	We understand there has been at least one waterbird collision (a nene) with powerlines along the highway of the Mana plains in 2022, along stretches without minimization measures (diverters). Acknowledging that one bird does not make a model wrong, would including that data from 2022 as part of the pre-minimization take be more accurate?	
5.	4-41	Honopu PF SAS goal is to attract ake-ake; there are nest boxes and a speaker system for this species. Is KIUC committed to maintaining SAS for band-rumped storm petrel, or would that component be removed if not included in this plan?	
6.	Page 4-6, see also 3-17 and 6-23	Metric 7 is quite vague. Can there be more assurance that potentially detrimental invasive species will be managed before they have enough of an impact to affect breeding pair numbers and thus require going through the adaptive management process? Particularly at Honopu PF, which was established by the Navy.	
7.		(Continued from above) Alternatively this statement might be referring to the potential disruption to protected individuals caused by habitat restoration efforts and monitoring. For instance, removing an invasive plant species that might be providing burrowing substrate for a current individual or another ecosystem service (i.e erosion). Long term, the removal of the invasive species and restoration to native substrate is the preferred objective but the actual act of restoration might have immediate negative impact on target species individuals making timing/ phenology of restoration/conservation efforts critical so that such efforts do not negatively impact protected species in the short term even though the long-term benefits are necessary. All monitoring,	

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		restoration, predator removal should be timed/ implemented thoughtfully so that the immediate negative impacts of restoration/ surveying that disturb the protected species the act is intending to protect are as minimal as possible. Regardless some clarification on both points is needed.	
8.	2.2.2	It appears that PMRF spans owned and operated by KIUC are not covered in this HCP. Can you confirm? Is the belief that this is covered by another document?	
9.	Figure 4-2 (4-28) pg 121	This map highlights the Mana spans as getting 69kV removal and in a supporting table (pg 504) these spans are also listed for 69kV removal and static wire removal. Assuming this refers to a removal of the transmission line which is somewhat discussed on pg 4-20. Is the span truly removed? This area is highlighted as a high collision rate for waterbirds but is not receiving diverters (4-20) It is not clear in the document. If the line is removed, isn't it redundant to mention the static line removal? If the line is removed what happens to that span? Is it just going away?	
10.	General	Current Prediction/goal will have positive benefits to PMRF by having more individuals even if there is an increase of take (by having more individuals).	
11.	Page 4-6 ,Metric 2	General Positive comment: Over time having a 3.5x larger NESH population will mean that each NESH take on PMRF due to light attraction will represent a smaller and smaller proportion of the population and thus less likely to result in jeopardy to the species.	
12.	4.4.4.1 (pg 4-38/ 131)	There is no mention of the Navy's role in initiating efforts at Honopu. Given that the establishment of that site was spearheaded by PMRF, it should be at least mentioned. The current write up makes it sound like DOFAW and earlier efforts by KIUC established that site.	
13.	5E-3 (pg 700/847)	The Honopu predator exclusion fence is presented as an HCP management action with completion in 2022, however we are not aware of KIUC's involvement in establishment of the fence or other actions at the Honopu site. DoD funded this project at \$1.26M via OSD REPI program with additional contributions from DLNR DOFAW and the National Fish and Wildlife Foundation (NFWF) but we are not tracking other contributors. Can KIUC confirm?	
14.	18 (pg 837/847)	Do predator exclusion fence maintenance costs at Honopu fully account for recent increases in materials pricing/shipping and helicopter slingload transport? Regular maintenance of both the ungulate and predator exclusion fences is essential to the long-term success of the Honopu colony.	