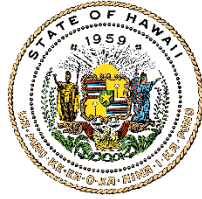


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October 30, 2023

Endangered Species Recovery Committee  
State of Hawai'i  
Honolulu, Hawai'i

Committee Members:

**SUBJECT:** Request for Recommendation of Approval of the Revised Kahuku Wind Project Tier 2 Hawaiian Hoary Bat Mitigation Plan for the Helemano Section of the 'Ewa Forest Reserve O'ahu.

Dear Committee Members,

The Department of Land and Natural Resources, Division of Forestry and Wildlife (DOFAW) is requesting the Endangered Species Recovery Committee (ESRC) to review and provide a recommendation of approval for the *Kahuku Wind Project Tier 2 Hawaiian Hoary Bat Mitigation Plan* ("Mitigation Plan"; September 2023) to take place at the 'Ewa Forest Reserve – Helemano Section, on the island of O'ahu. The Mitigation Plan was prepared by TetraTech on behalf of Brookfield Renewable Partners (licensee) as part of the obligations under the Kahuku Wind Power Habitat Conservation Plan (HCP; SWCA 2010) and State Incidental Take License (ITL; ITL-10).

Background:

The Kahuku Wind Power HCP/ITL authorizes the incidental take of eight (8) 'ōpe'ape'a or Hawaiian hoary bat (*Lasiurus semotus*) under Tier 2 (Higher Level Take) of the plan. The biological goal of the Mitigation Plan is to fully offset the take and provide a net benefit to the species.

DOFAW staff, in conjunction with the U.S. Fish and Wildlife Service, has worked with the licensee and its contractor through several rounds of revision of the Mitigation Plan. In addition, the licensee consulted individually with the U.S. Geological Survey and Dr. Loyal Merhoff (former ESRC-at-large member) on April 24, 2023, all of whom provided recommendations and comments to the Mitigation Plan as well.

Analysis:

After the internal review process of the latest draft Mitigation Plan, DOFAW considers Kahuku has addressed all of the agency comments and concerns and has followed the framework laid out in Section V (Mitigation), Subsections B and C, of the 2021 Hawaiian Hoary Bat Guidance Document (in draft). See Table A for more information.

**Table 1.** DOFAW Evaluation & Compliance Checklist for the Kahuku Tier 2 Hawaiian hoary bat Mitigation Plan

Recommended Mitigation Planning Framework & Recommendations	☒	DOFAW Comments
<b>Biological Goals &amp; Objectives</b>		
<p><b>Biological goals and objectives that establish specific, measurable outcomes that describe the targets that the mitigation is expected to achieve and serve as the measures of success.</b></p>	☒	<p>The Mitigation Plan clearly states the main biological goal and describes the biological objectives, which are linked to a set of success criteria. Making those objectives specific, measurable, achievable, result-oriented, and time-bound.</p> <p>Refer to Subsection <i>1.2 Biological Goals and Objectives</i> (pg. 4-6); Subsection <i>4.5 Success Criteria</i> (pg. 31-32)</p>
<b>Management Actions</b>		
<p><b>Implementation plans that specify how the work will be accomplished to reach the targets and include a schedule of activities</b></p>	☒	<p>The Mitigation Plan lays out the mitigation/management actions that will be implemented to achieve the biological objectives, which are tied to the baseline conditions of the Helemano Mitigation Area. In addition, a timeline that shows the time frame of when management actions will be implemented is also included.</p> <p>Refer to Section <i>4.0 Mitigation Actions</i>, Subsections 4.1 through 4.3 (pg. 21-30); <i>Table 3. Summary of Management Actions in the Mitigation Area</i> (pg. 24 - 25); and <i>Table 5. Timeline for Actions to be Implemented</i> under Section 9.</p>
<b>Monitoring</b>		
<p><b>Monitoring plans that establish schedules of activities designed to assess progress toward goals and objectives, with time-specific targets that will provide a meaningful indication of whether</b></p>	☒	<p>Kahuku will monitor the Helemano Mitigation Area by using acoustic, arthropod, vegetation, and invasive species monitoring. Bat acoustic activity and biomass and/or diversity of bay prey results are primary indicators used to determine success criteria and used</p>

<p><b>the implementation is successfully on track to achieve success</b></p>		<p>to identify triggers for adaptive management.</p> <p>In addition, a Control Site will be established adjacent to the Helemano Mitigation Area. There is no fencing or cattle grazing at the Control Site. No management actions will occur at the control site to isolate the effects of management actions. Monitoring of bat activity and insect composition will occur at this site. Given the similarity of habitat, bat activity in the Helemano Mitigation Parcels 1 and 2 will be compared to bat activity at the control site to help better understand the effects of the implementation of mitigation actions on bat activity</p> <p>Refer to Section 5.0 <i>Monitoring</i> (pg. 32-36); and Subsection 3.4.3 <i>Control Site</i></p>
<p><b>Measures of Success</b></p>		
<p><b>It is recommended that monitoring at a mitigation site be able to provide a quantitative assessment of whether the project is on track to meet its mitigation goals</b></p>	<p><input checked="" type="checkbox"/></p>	<p>As mentioned before, the Mitigation Plan success criteria are measurable and time-based, which identify interim targets related to bat acoustic activity and bat prey presence that, if not met, will trigger the adaptive management program.</p> <p>Refer to Subsection 4.5 <i>Success Criteria</i> (pg. 31-32).</p>
<p><b>Adaptive Management</b></p>		
<p><b>Adaptive management approaches are based on the results of monitoring and describe alternative actions that will be implemented if mitigation targets aren't being reached by the proposed implementation actions.</b></p>	<p><input checked="" type="checkbox"/></p>	<p>The Mitigation Plan specifies thresholds that trigger the implementation of a particular adaptive management strategy or actions.</p> <p>Refer to Section 8.0 <i>Adaptive Management</i> and Table 4. <i>Adaptive Management Strategy</i> (pg. 38 – 40).</p>

Respectfully submitted,

TA for   
**DAVID G. SMITH**  
 Administrator

Attachment:  
 Kahuku Wind Project Tier 2 Hawaiian Hoary Bat Mitigation Plan