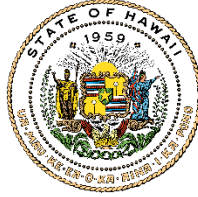


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December 12, 2025

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

SUBJECT: Review of the Kaua'i Island Utility Cooperative Second Draft Habitat
Conservation Plan —Executive Summary through Chapter Five

Dear Committee Members,

The Department of Land and Natural Resources, Division of Forestry and Wildlife (DOFAW), respectfully requests that the Endangered Species Recovery Committee (ESRC) review the Kaua'i Island Utility Cooperative's (KIUC) Second Draft Habitat Conservation Plan (HCP). In this meeting, we ask that the Committee provide comments and concerns on the document, focusing on the Executive Summary through Chapter Five. This submittal includes background information on the Second Draft HCP, the covered species, and upcoming review meetings for this document.

BACKGROUND

The Kaua'i Island Utility Cooperative (KIUC) is the sole power generator and the only electrical cooperative on the island. Half of its fuel supply comes from renewable sources. It manages facilities, transmission lines, distribution lines, and streetlights across the island. Currently, KIUC operates 171 miles of transmission lines, 1,360 miles of distribution lines, and 70 miles of communication lines. It also controls lighting at two power stations, 4,150 existing streetlights, and may need up to 85 hours of emergency nighttime lighting. KIUC estimates installing up to 360 miles of new powerlines and 1,754 new streetlights over the 50-year HCP period. Because KIUC's assets are spread throughout the island, the entire geographic area of ka moku o Kaua'i (the island of Kaua'i) is included in this plan.

KIUC is currently seeking coverage for the species listed in **Table 1**, protected under Hawai'i endangered species law HRS § 195D *Conservation of Aquatic Life, Wildlife, and Land Plants*, as well as the Federal Endangered Species Act. A review of the applicant's take request for each of these species is summarized in **Table 2**.

‘Ōlelo Hawai‘i	Taxon	Common Name
‘Akē‘akē	<i>Hydrobates castro</i>	Band-rumped storm petrel
‘A‘o	<i>Puffinus newelli</i>	Newell’s shearwater
‘Ua‘u	<i>Pterodroma sandwichensis</i>	Hawaiian petrel
Ae‘o	<i>Himantopus mexicanus knudseni</i>	Hawaiian stilt
‘Alae ke‘oke‘o	<i>Fulica alai</i>	Hawaiian coot
‘Alae ‘ula	<i>Gallinula galeata sandvicensis</i>	Hawaiian common gallinule
Koloa maoli	<i>Anas wyvilliana</i>	Hawaiian duck
Nēnē	<i>Branta sandvicensis</i>	Hawaiian goose
Honu	<i>Chelonia mydas</i>	Green sea turtle

Table 1: Species requested by KIUC for coverage under an ITL due to incidental take incurred from lawful operation of the utility.

Taxon	Annual Take	Take for HCP Term (50 Years)
‘Akē‘akē	1	71
‘A‘o	6,595	329,765
‘Ua‘u	2,479	123,967
Ae‘o	1	53
‘Alae ke‘oke‘o	2	107
‘Alae ‘ula	2	135
Koloa maoli	10	490
Nēnē	25	1,236
Honu	1 Nest	50 Nests

Table 2: Requested take for all covered species annually and over the fifty-year term of the HCP.

During an initial 10-year period, the utility and its conservation partners gathered field data to understand the distribution, population sizes, and behaviors of these seabirds across various locations on the island. This work led to the identification of monitoring and research projects that are to be implemented at conservation sites in the northwestern corner of Kaua‘i. From May 2011 to May 2016, KIUC’s take of threatened and endangered species was authorized by a Federal Incidental Take Permit (ITP) that accompanied a Short-Term HCP. This short-term plan only covered three of the nine proposed taxa in the current Long-Term Second Draft HCP: 1) a‘o or Newell’s shearwater, 2) ‘ua‘u or Hawaiian petrel, and 3) ‘akē‘akē or band-rumped storm petrel. When the Short-Term HCP expired in 2016, KIUC agreed with the Agencies (DOFAW and USFWS) to continue these conservation management actions. This information, along with lessons learned and insights from State and Federal biologists, has culminated in a draft Long-Term HCP. The first draft was reviewed by the Endangered Species Recovery Committee in 2023. The most recent version, or second draft, incorporates their guidance, along with Agency and public comments, and an additional population model scenario.

The first six chapters of the HCP, from the Executive Summary through Chapter Five, provide an overview of the HCP, including the need for an incidental take license (ITL), other related KIUC conservation management plans, covered activities, geographic

scope and environmental setting, covered species, biological goals and conservation measures, and how their take request was developed. We ask Committee members to pay special attention to Chapters 4 and 5. The Division's official comments and recommendations will be sent separately to the Committee.

COVERED SPECIES BACKGROUND

A'o, or Newell's Shearwater, is endemic to the Hawaiian Islands, with Kaua'i supporting about 90% of the world's population. 'Ua'u, or Hawaiian petrel, is native to our islands, and 33% of its total population lives here. 'Akē'akē, or band-rumped storm petrel, has a disjunct distribution and is considered indigenous within the state. All three seabird species have documented and actively managed colonies in the northwestern corner of Kaua'i. However, these species do nest across the entire island. Collisions with power lines and fallout from light attraction are among the main human-related threats to these species.

In Mānā and Hanalei, waterbirds are also affected by powerline collisions. Kaua'i has the largest population of waterbirds in the state and is home to the only population of nearly pure Hawaiian ducks or koloa maoli.

Like fledgling seabirds, sea turtle hatchlings are also influenced by light attraction. Honu, or green sea turtles, have a pantropical range, with part of the Central North Pacific Distinct Population Segment found in Hawai'i. The more elusive honu'ea, or hawksbill turtle, may represent a unique genetic group and nesting community in Hawaiian waters.

UPCOMING REVIEW MEETINGS

This meeting is part of a series where DOFAW will request the Committee to evaluate the entirety of the KIUC Second Draft HCP. The next meeting is tentatively scheduled for January 16th, 2026. It will cover Chapters 6-8 and the Appendices.

If you have any questions, please contact Habitat Conservation Planning Program Associate, Jesse W. Adams, at jesse.w.adams.researcher@hawaii.gov.

Respectfully Submitted,



DAVID G. SMITH
Administrator