

KWP II FY 2025 Annual Report Comment Response Matrix

(Comments on FY 2025 Annual report submitted on 8/15/2025; USFWS comments received on 9/26/2025; DOFAW comments received on 01/30/26)

Commenting Agency	Document Section	Page Number	Comment/Question	KWP II Response
PIFWO	Executive Summary	i	Highlighted text: "In FY 2025, probabilities of a carcass persisting until the next search were 0.73 ('ōpe'ape'a surrogates), 0.99 (nēnē surrogates), and 0.75 (seabird surrogates)." Comment: Slightly lower than FY 2024 values	Correct, we anticipate some degree of interannual variation, and modify our trapping efforts to try to bring these values up when needed.
PIFWO	Executive Summary	i	Highlighted text: "three 'ōpe'ape'a" Comment: Our tracker shows 4, 1 was found outside the search area.	Correct, three is the number of fatalities detected through standardized searches as noted in the opening of the sentence "Through FY 2025 and excluding incidental detections..."
PIFWO	Executive Summary	i	Highlighted text: "nine nēnē." Comment: 16 total, most likely some found on the outside of the search area.	Our accounting includes 14 total juveniles/adults, plus an additional gosling from FY 2018 which was attributed to wind farm operations but not a turbine fatality and is therefore included only in indirect take calculations. There was an additional fatality documented FY 2024 which is excluded based on the necropsy results and is therefore only mentioned in the FY 2024 report.
PIFWO	2.0	2	Highlighted text: "Since April 2015, search plots were reduced to the graded and maintained WTG pads and access roads that fall within a 70-meter radius circle centered on each of the Project's 14 WTGs (Figure 1). This search area continues to be used for monitoring in FY 2025; density weighted proportions of the carcass distribution searched are presented in Appendix 1 (analysis and development presented in the FY 2018 annual report)." Comment: Reviewing Anderson et al. 2022, Dalthorp et al. 2023, Maurer et al. 2020 and Prakash et al. 2022, is Hull & Muir still best available ballistics information for this site, or would it be appropriate to update these parameter assumptions?	KWP II uses site specific fatality location data to determine the density weighted proportion of the carcass distribution searched used for fatality estimate adjustment (as opposed the the theoretical Hull and Muir. Site specific data is most appropriate over theoretical models.

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PIFWO	2.0	2	<p>Highlighted text: "All search plots were inspected by a canine search team which included a trained detector dog accompanied by a handler; should search conditions prevent the use of dogs (e.g., weather, injury, availability of canine search team, etc.), search plots would be visually surveyed by Project staff. No visual-only searches occurred in FY 2025."</p> <p>Comment: Please provide GIS tracks for search effort/canine searches to refine/validate EoA (a) value.</p>	<p>The value of canine searches is that they utilize olfactory detection rather than visual detection, so the complete coverage of a search area relies not only on the locations covered by the canine but also the canines ability to smell targets that are nearby. Nonetheless, canine handlers watch the canine searcher to confirm total coverage of the search area and will direct the canine to parts of the search area if the canine does not cover them on their own. We do use GPS to ensure full plot coverage during the search, however these tracks are used for survey coverage rather than data collection and as such, have not been saved. It's important to note that tracks would likely not be completely accurate of what was actually covered given GPS signal quality, device precision, and environmental conditions.</p>
PIFWO	5.0	4	<p>Highlighted text: "between" [Based on the comment, we presume PIFWO is referring to Figure 1 on page 3]</p> <p>Comment: Are search areas depicted on this map derived from actual gps tracks collected during search efforts? Can this be provided?</p>	<p>Search areas are delineated based on the areas cleared of vegetation within the search radius, and the site specific DWP is based on these areas. The canine searchers target these areas in their weekly searches, and searcher efficiency and carcasses persistence trials are based on these areas of cleared vegetation. See response to above comment related to GPS tracks.</p>
PIFWO	7.2.1	8	<p>Highlighted text: "within the search area"</p> <p>Comment: We were unable to review the spatial coverage area in our EoA replication. An interesting point, equivalent to KWPI's review is that HAPE and Nene have different spatial coverage areas for KWP II. Unsure why that would be. As noted previously, these search areas are rather small</p>	<p>The DWP for each site is determined by the delineation of search area around each turbine, which varies by turbine and project. The FY 2018 report outlines how the DWP was calculated for the current search plots at KWP II. Calculations are slightly different between KWP I and II however the foundational information is similar and can be found in the KWP I 2025 HCP Appendix I.</p>

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PIFWO	9.3	15	<p>Highlighted text: "9.3 Nēnē"</p> <p>Comment: If current mitigation offset is being allocated to meet KWPI obligations, and take is still occurring for KWPII, it may be advisable to look for alternative options for the KWPII HCP to meet offset before ending of permit expiration 2032.</p>	<p>As stated in this section, KWP II is currently working with DOFAW, USFWS, and KWP I to determine future credit allocations, with the intent being that all permits will achieve mitigation credits annually (i.e., every permit should be achieving some mitigation credits each year).</p> <p>We anticipate that with the addition of Puu O Hoku Ranch release pen, we will be on the trajectory to meet the obligation prior to the end of the permit term.</p>
PIFWO	9.3	16	<p>Highlighted text: "KWP II recognizes that nēnē mitigation is lagging;"</p> <p>Comment: Permittee may be advised to begin developing plans for an additional mitigation project due to current lag and anticipated further delays.</p>	<p>Noted, and please see above comment and response.</p>
PIFWO	10.0	18	<p>Highlighted text: "Additionally, KWP II will continue to monitor nēnē activity on site to inform vegetation management successes and needs, and continue to work with USFWS, DOFAW, and technical experts to further reduce risk to the species."</p> <p>Comment: Due to further delays in mitigation caused by sharing project sites with KWP I and that project nearing the end of its permit term, KWP II may need to explore additional nene mitigation options.</p>	<p>Noted, and please see above comments and responses.</p>
DOFAW	1.0	1	<p>Highlighted text: "The Covered Species include: • Ōpeʻapeʻa (Hawaiian hoary bat, Lasiurus cinereus semotus) • Nēnē (Hawaiian goose, Branta sandvicensis) • ʻUaʻu (Hawaiian petrel, Pterodroma sandwichensis); and • ʻAʻo (Newell’s shearwater, Puffinus newelli)."</p> <p>Comment: Does KWP II plan to consult DOFAW Maui regarding the possible potential presence of Assiumulans Yellow-faced bees at KWP II?</p>	<p>The access road through KWP II will be surveyed as part of the 2026 survey, and we plan to meet with entomologists to discuss those results and implications in early May 2026. All avoidance measures implemented at KWP I will also be implemented at KWP II, and all staff will receive assimilans yellow faced bee and 'ilima identification training.</p>

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DOFAW	2.0	2	<p>Highlighted text: "Because individual nēnē are not banded..."</p> <p>Comment: DOFAW Maui anticipates being able to band more birds this season with more staff currently on board.</p>	<p>This is exciting and productive news, and with banding, we will be able to have a much better understanding of nene movement and productivity onsite.</p>
DOFAW	3.0	2	<p>Highlighted text: "In FY 2025, the probability that a carcass persisted until the next search was 0.73 for all 'ōpe'ape'a surrogates (95 percent Confidence Interval [CI] = 0.6, 0.84; N=20), 0.99 for large birds (95 percent CI = 0.86, 1.00; N=9), and 0.75 for medium-sized birds (95 percent CI = 0.41, 0.92; N=11)"</p> <p>Comment: Are these numbers up from last year or how do they compare?</p>	<p>From FY 2024 report: In FY 2024, the probability that a carcass persisted until the next search was 0.82 for all bat surrogates (95 percent Confidence Interval [CI] = 0.71, 0.91; N=23), 1.00 for large birds (95 percent CI = 0.97, 1.00; N=9), and 1.00 for medium-sized birds (95 percent CI = 0.97, 1.00; N=11). We anticipate some degree of interannual variation, and modify our trapping efforts to try to bring these values up when needed.</p>
DOFAW	7.0	5	<p>Highlighted text: 7.0 Documented Fatalities and Take Estimates</p> <p>Comment: KWP II should look into developing a site specific model for DWP and fatality estimates incorporating wind speed and direction.</p>	<p>KWP II will consider this pending the results of the KWP I investigation.</p>
DOFAW	9.2	15	<p>Highlighted text: "The annual detection rate in FY 2025 (6.4 percent) was marginally lower than the annual detection rate in FY 2024 (9.0 percent)."</p> <p>Comment: Why do you think the annual detection rate out of the bat acoustical data dropped this year compared to last year's?</p>	<p>Interannual variation is a normal occurrence, and our study isn't designed to determine causation. Nevertheless, as shown in Figure 4 and discussed in the text, annual detection rates vary between all monitoring years but were not significantly different. Furthermore, across all monitoring years, there is an increasing trend in annual detection rate, though marginal and not statistically significant.</p>

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DOFAW	10.0	18	<p>Highlighted text: "In accordance with the HCP, low wind speed curtailment (LWSC) was implemented from the start of Project operations at wind speeds of up to 5 meters per second (m/s) at all WTGs for the months..."</p> <p>Comment: It was recommended for KWP I to implement LWSC at 6.5 m/s year round. KWP II should explore increased year round curtailment until an informed or smart curtailment is developed for this site</p>	<p>KWP II will consider changes to the LWSC should fatality data indicate that they are warranted. At this time, a single bat fatality has been detected over 11.5 years of monitoring since implementing the current LWSC protocols.</p>
DOFAW	10.0	18	<p>Highlighted text: "KWP II will continue to manage woody vegetation on site in FY 2026 in conjunction with agency approval. Additionally..."</p> <p>Comment: Add in consideration for the Yellow-faced bees, vegetation management and control will follow species specific recommendations.</p>	<p>The access road through KWP II will be surveyed as part of the 2026 survey, and we plan to meet with entomologists to discuss those results and implications in early May 2026. All avoidance measures implemented at KWP I will also be implemented at KWP II, and all staff will receive assimilans yellow faced bee and 'ilima identification training.</p>
DOFAW	3.6	6	<p>Highlighted text: "Predator traps are used to control rats (Rattus rattus), mongoose (Herpestes javanicus), and feral cats (Felis catus) that may pose a threat to nēnē. Traplines were baited and checked weekly at the Ranch during the breeding season, and biweekly during non-breeding season using 10 Tomahawk live traps, 20 DOC 200 traps, 10 A24s, 1 Trapinator body grip and 2 AT220 traps. In FY 2025 at the Ranch, five mongoose, seven rats and two cats were removed"</p> <p>Comment: Would be good to look into Doc 250s as more efficient traps for predators.</p>	<p>We continue to have success with the DOC200s at catching mongoose at the Ranch. We have modified our trapping effort, and added the AT220 traps and new DOC200s in FY 2025. The KWPs have also increased their trapping effort at the Ranch by expanding the locations of where we trap to provide nesting nene outside the pen with additional protection.</p>