

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA

DIVISION OF FORESTRY AND WILDLIFE
1151 PUNCHBOWL STREET, ROOM 325
HONOLULU, HAWAII 96813

DAWN N.S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE
MANAGEMENT

RYAN K.P. KANAKA'OLE
FIRST DEPUTY

CIARA W.K. KAHAHANE
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE
MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES
ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

April 11, 2026

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

SUBJECT: Endangered Species Recovery Committee Evaluation of the
Alexander & Baldwin, Inc. Implementation of the Kaua'i Seabird
Habitat Conservation Plan During 2025

Dear Committee Members,

The State of Hawai'i Department of Land and Natural Resources, Division of Forestry and Wildlife (DOFAW) requests the Endangered Species Recovery Committee (ESRC) review the 2025 Kaua'i Seabird Habitat Conservation Plan (KSHCP) Annual Report prepared by Pacific Rim Conservation regarding Alexander & Baldwin Inc. (A&B) an individual participant in the KSHCP. This request is in accordance with the requirements outlined in Section 195D-25, Hawai'i Revised Statutes. The 2025 KSHCP Annual Report compiles information from eight individual participants as part of the obligations of the KSHCP and State Incidental Take Licenses (ITL). This submittal summarizes the A&B portion of the 2025 KSHCP Annual Report and includes information provided to DOFAW and the U.S. Fish and Wildlife Service (collectively, "the Agencies") by the participant over the last year.

BACKGROUND:

ITL Licensee: ITL-31; Alexander & Baldwin, Inc.

Project: Three properties:

- Hōkūlei Shopping Village
- The Shops at Kuku'iula (TSAK)
- Port Allen commercial properties (5 leased properties)

ITL Duration: June 12, 2020–June 12, 2050. At the end of 2025, the participant is approximately 5.5 years (18%) into their permit term.

Miscellaneous: In 2025, the former director of A&B Environmental Affairs retired, and Jeff Kermode subsequently assumed this role. The director of A&B Environmental

Affairs is responsible for the implementation of the KSHCP.

In February 2025, A&B submitted a letter to the Agencies to request the removal of seven properties from the KSHCP. These properties were sold between 2020 and 2024 and are no longer owned by A&B.

Status of ITL:

Covered Species Under ITL-31: 'A'o (Newell's shearwater), 'ua'u (Hawaiian petrel), and 'akē'akē (band-rumped storm petrel) fledglings.

Observed take of Covered Species in 2025:

- 'A'o fledglings: 2 lethal / 6 non-lethal
- 'Ua'u fledglings: 0 lethal / 0 non-lethal
- 'Akē'akē fledglings: 0 lethal / 0 non-lethal

Calculated take of Covered Species in 2025:

Using the 50% discovery rate stated in the Participant Inclusion Plan (PIP)

- 'A'o fledglings: 10 lethal / 6 non-lethal
- 'Ua'u fledglings: 0 lethal / 0 non-lethal
- 'Akē'akē fledglings: 0 lethal / 0 non-lethal

Table 1. Authorized take, cumulative calculated take, maximum 5-year rolling average, and actual 5-year rolling average of fledgling take for Covered Species.

Covered Species	Authorized fledgling take (lethal / non-lethal)	Cumulative calculated* fledgling take through 2025 (lethal / non-lethal)	Maximum 5-year rolling average of fledgling take	Actual 5-year rolling average of fledgling take (2021 - 2025)
'A'o (Newell's shearwater)	104 / 80	48 / 28**	3.47 / 2.67	9.4 / 5.4
'Ua'u (Hawaiian petrel)	3 / 3	0 / 0	N/A	N/A
'Akē'akē (band-rumped storm petrel)	1 / 1	0 / 0	N/A	N/A

*The A&B PIP discovery rate of 50% was used for take calculations.

**A&B reports their cumulative calculated fledgling take is 30 lethal / 20 non-lethal. Take numbers will be reconciled in 2026.

The participant's 5-year rolling average for lethal and non-lethal take of fledgling 'a'o indicates that if the current rate continues, A&B will exceed its authorized take before the end of the 30-year license term. Additional adaptive management measures should be implemented to minimize 'a'o take.

Minimization Measures:

Port Allen

Downed Seabird Searches: Trained wildlife control contractors conducted downed seabird searches 3–4 hours after sunset and 1 hour prior to sunrise throughout the duration of fledgling season (September 15–December 15) except for the last day which was missed due to a contractor error.

Prior to the start of fledgling season, A&B worked to clear heavily vegetated areas behind Port Allen Center II and near the Steel Warehouse to facilitate effective seabird searching and reduce predator habitat.

Lighting: During the fledgling season, lighting inside the Steel Warehouse was reduced to limit light emanating from its semi-opaque roof and side panels. The tenant however, noted safety concerns. A&B is working to find and implement a solution for this issue prior to the 2026 fledgling season.

Predator Control: A&B continued to use a wildlife control contractor to trap predators. Pre-season trapping began on August 15, and daily trapping continued throughout the season except for two days when traps were not set. At Port Allen, four traps were deployed for a total of 460 trap nights, which resulted in the removal of 17 predators. One loose dog was also captured with the assistance of the Kaua'i Human Society. No cat feeding or trap tampering was noted at this facility.

Predator monitoring occurred in conjunction with downed seabird searches. Twelve predator sightings were reported during 183 searches, 55% less than what was reported during the 2024 fledgling season. Predator sightings were relayed to the wildlife control contractor for adaptive trapping.

Outreach: Due to high fallout in the Port Allen vicinity and in an effort to minimize surrounding lighting which may be contributing to fallout, pre-season outreach efforts continued in 2025. Informational fliers were mailed to nearby landowners and hand-delivered to residents of the Hawaii Public Housing Authority project (adjacent to Port Allen Marina Center) to increase community awareness around seabird fallout and the importance of minimizing lighting during fledgling season.

A&B also reached out to a brightly lit neighboring facility where more than one downed 'a'o was recovered by A&B's seabird searchers in 2025.

A&B met with a community member who operates a cat colony near Port Allen prior to the 2025 fledgling season to connect, provide education, and address her concerns in hopes that this would facilitate more effective predator control.

Hökūlei Shopping Village

Downed Seabird Searches: Trained wildlife control contractors conducted daily downed seabird searches 3–4 hours after sunset and 1 hour prior to sunrise throughout the duration of fledgling season, except for December 15, due to a contractor error. In past years, vagrancy limited searches on portions of this property, but this did not pose a problem in 2025. Adaptive management (i.e., increased security presence) was effective at addressing the issue.

A&B contacted the tenant of the vacant, fenced Walgreens lot which was not easily searchable due to overgrown vegetation. The tenant cleared vegetation which enabled visual searches from the perimeter of the fenced lot. Pending tenant cooperation, vegetation management in this area will be incorporated into future pre-season activities at Hōkūlei Shopping Village.

Lighting: In 2024, A&B identified a tenant-owned light which required repairs to be compliant KSHCP lighting requirements. Despite outreach to the tenant, it remained unrepaired through a portion of the 2025 fledgling season. Ultimately, A&B Environmental Affairs modified the shield to ensure it was compliant until a permanent replacement shield arrives.

Predator Control: A&B continued to use a wildlife control contractor to trap predators at Hōkūlei Shopping Village. Pre-season trapping began on August 14, and continued throughout the season, except for one weekend in August and one day when traps were not set. Four traps were deployed for a total of 470 trap nights, which resulted in the removal of 12 predators. Tampering with traps was noted on four occasions. No cat feeding was noted.

Predator monitoring occurred in conjunction with downed seabird searches. Thirty-one sightings were reported during 183 searches, approximately the same occurrence as in 2024. Predator sightings were relayed to the wildlife control contractor for adaptive trapping.

The Shops at Kukui'ula

Downed Seabird Searches: Trained wildlife control contractors conducted searches 3–4 hours after sunset and trained landscape and building maintenance contractors conducted early morning searches 1 hour prior to sunrise throughout the fledgling season except for two days. The two search days were missed due to a scheduling error and contractor error.

In-season decoy trials helped identify a deficiency in morning searches and allowed the participant to correct the issue in a timely manner by provide additional training to the landscape and building maintenance contractors.

Lighting: In 2025, twenty-five globe lights were modified to mimic full cut-off fixtures. Additional lighting upgrades (i.e., minimization) on TSAK Buildings A and B have begun and will be completed prior to the 2026 fledgling season. A facility-wide lighting upgrade is also being planned.

Predator Control: A&B continued to use a wildlife control contractor to trap predators

at TSAK. Daily, pre-season predator trapping began on June 16, earlier than in prior years, with the deployment of two traps. An additional two were deployed between August 14, and October 31, and a total of four to six traps were deployed between November and December. Trapping effort totaled 617 trap-nights, which resulted in the removal of 19 predators.

A concerted effort to stop feral cat feeding near Longs Drugs has reduced predator observations, though some feeding still occurs after midnight despite warnings from security. Trap tampering also occurs in this area and in the vicinity of Living Foods and was noted on 13 occasions.

Predator monitoring occurred in conjunction with downed seabird searches. Fifty-five sightings were reported during 183 searches, 40% less than what was reported in 2024. Predator sightings were relayed to the wildlife control contractor for adaptive trapping.

Employee Training and Outreach across all A&B Properties: Seabird Awareness, Search, and Recovery Training was provided both in-person and via video conferencing by contracted environmental consultants H.T. Harvey to a total of 47 A&B employees and tenants.

Since 2023, A&B has continued with annual in-house Downed Seabird Searcher Effectiveness Monitoring and Improvement Program which places seabird decoys at all facilities throughout the fledgling season. As previously mentioned, this program helped to quickly identify and address any deficiencies in searches. Recovery rates of decoys are above the 50% discovery rate noted in the participant's PIP. The program also increases searcher motivation via friendly competition and increased accountability.

During internal reviews following the 2025 fledgling season, it was determined that the distribution of printed outreach materials to A&B tenants did not occur in 2025 and may not have occurred across all facilities in prior years. Information and outreach regarding fledgling season were however provided verbally during tenant meetings. In coming years, a checklist of pre-season tasks will be used to ensure the distribution of outreach materials occurs. A&B will also follow up directly with facility managers/tenants prior to the start of fledgling season as well as after fledgling season to discuss effectiveness of outreach with tenants.

Prior ESRC Recommendations

A&B implemented the following ESRC recommendations from the April 24, 2025, KSHCP meetings.

1. Recommend continuing 2025 adaptive management measures identified by licensee: i.e., continue decoy program, address cat feeding at TSAK, vagrancy issues at Hōkūlei, earlier audits of lighting, and addressing outstanding lighting at TSAK.
2. Identify and implement additional adaptive management measures, including further reducing property lighting, increasing searcher efficacy, and increasing predator control to lower the current rate of 'a'o take.

Outstanding ESRC Recommendations

None.

RECOMMENDATIONS:

DOFAW appreciates the minimization measures A&B implemented in 2025 including continuing with in-house decoy trials, further minimizing lighting, increasing predator control, and continuing with tenant and community outreach.

DOFAW Recommendations:

1. Carry out planned minimization actions in 2026 and continue to identify and implement additional adaptive management measures including further reducing lighting.

If you have any questions, please contact Kelli Yamaguchi, Habitat Conservation Planning Program Associate, at kelli.yamaguchi.researcher@hawaii.gov.

Respectfully submitted,

 for DGS

DAVID G. SMITH
Administrator