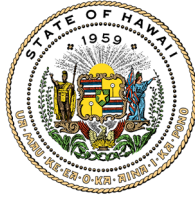


JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

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

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FIRST DEPUTY

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April 11, 2026

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

SUBJECT: Endangered Species Recovery Committee Evaluation of the
Hawai'i Department of Transportation 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 the Hawai'i Department of Transportation (HDOT), 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 HDOT 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-30; State of Hawai'i Department of Transportation

Project: Līhu'e Airport, Nāwiliwili Harbor, and Port Allen on Kaua'i

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.

Status of ITL:

Covered Species Under ITL-25: '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 / 4 non-lethal
 - o Līhu'e Airport: 2 lethal 'a'o fledglings
 - o Nāwiliwili Harbor: 1 non-lethal 'a'o fledgling
 - o Port Allen: 3 non-lethal 'a'o fledglings
- 'Ua'u fledglings: 0 lethal / 0 non-lethal
- 'Akē'akē fledglings: 0 lethal / 0 non-lethal

Calculated take of Covered Species in 2025

Take was calculated using the discovery rates stated in the Participant Inclusion Plan (PIP) – 75% for Līhu'e Airport, 90% for Nāwiliwili Harbor, and 50% for Port Allen.

- 'A'o fledglings: 5.78 lethal / 4 non-lethal
- 'Ua'u fledglings: 0 lethal / 0 non-lethal
- 'Akē'akē fledglings: 0 lethal / 0 non-lethal

Table 1. 'A'o authorized take, cumulative calculated take, maximum 5-year rolling average, and actual 5-year rolling average of fledgling take at HDOT properties.

HDOT Facility	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)
Līhu'e Airport	22 / 43	10 / 10	0.73 / 1.43	1.87 / 1.60
Nāwiliwili Harbor	13 / 48	2.44 / 12	0.43 / 1.6	0.49 / 2.40
Port Allen	68 / 53	8 / 8	2.27 / 1.77	1.40 / 1.40
All HDOT Facilities Combined	103 / 144	20.44 / 30	3.43 / 4.8	3.76 / 5.4

*The HDOT PIP discovery rates of 75% for Līhu'e Airport, 90% for Nāwiliwili Harbor, and 50%

for Port Allen were used to calculate take which occurred at each respective facility.

Table 2. 'Ua'u authorized take and cumulative calculated take of fledglings at HDOT properties.

HDOT Facility	Authorized fledgling take (lethal / non-lethal)	Cumulative calculated* fledgling take through 2025 (lethal / non-lethal)
Līhu'e Airport	3 / 6	0.33 / 1
Nāwiliwili Harbor	2 / 6	1.11 / 0
Port Allen	0 / 0	0 / 0
All HDOT Facilities Combined	5 / 12	1.44 / 1

*The HDOT PIP discovery rates of 75% for Līhu'e Airport, 90% for Nāwiliwili Harbor, and 50% for Port Allen were used to calculate take which occurred at each respective facility.

Table 3. 'Akē'akē authorized take and cumulative calculate take of fledglings at HDOT properties.

HDOT Facility	Authorized fledgling take (lethal / non-lethal)	Cumulative calculated* fledgling take through 2025 (lethal / non-lethal)
Līhu'e Airport	1 / 2	0 / 0
Nāwiliwili Harbor	0 / 0	0 / 0
Port Allen	0 / 0	0 / 0
All HDOT Facilities Combined	1 / 2	0 / 0

*The HDOT PIP discovery rates of 75% for Līhu'e Airport, 90% for Nāwiliwili Harbor, and 50% for Port Allen were used to calculate take which occurred at each respective facility.

Minimization Measures:

Līhu'e Airport

Downed Seabird Searches: Searches were conducted daily, 3–4 hours after sunset and within 1 hour of sunrise, throughout the entire fledgling season (September 15–December 15). Trained searchers searched the public area, while U.S. Department of Agriculture, Wildlife Services (USDA-WS) biologists searched the Aircraft Operations Area (AOA).

Lighting: No new lighting changes were implemented in 2025.

Predator Control: Predator control is carried out by USDA-WS (both within the AOA and public areas) year-round per Līhu'e Airport's Wildlife Hazard Management Plan. Prior to the start of fledgling season, HDOT works with USDA-WS to increase predator trapping. During the fledgling season, eleven traps were deployed daily for a total of 1,001 trap nights, which resulted in the removal of six predators.

In 2025, an increase in cat feeding, predator presence, and tampering with traps in public areas of the airport was noted. HDOT met with Līhu'e Airport management officials and USDA-WS to reinforce the importance of predator control and discuss solutions. Following the meeting, senior Airports Division personnel visited cat feeding locations on airport property to reinforce that the practice violates airport policy. Seabird searchers were also instructed to dispose of all food and water containers on sight. In 2026, additional signage clearly prohibiting feeding of feral cats or chickens will be posted across the airport.

Staff Training and Outreach: Forty-three airport staff received in-person Seabird Awareness and Response Training prior to the start of fledgling season.

A memorandum was distributed to all Līhu'e Airport staff and employees on August 22, 2025, which instructed all personnel to be on the lookout for grounded seabirds. The memo also outlined proper protocols for seabird recovery and reporting and reinforced the airport's no cat feeding policy. Fact sheets with information on Kaua'i's seabird species, light attraction, and seabird recovery and reporting protocols were also distributed to rental car staff, air cargo staff, taxi vendors, and parking attendants.

Nāwiliwili Harbor

Downed Seabird Searches: Searches were conducted daily, 3–4 hours after sunset and within 1 hour of sunrise, throughout the entire fledgling season. Trained wildlife control contractors conducted the evening searches while trained harbor security staff conducted the early morning searches. Harbor security staff also remained vigilant for downed seabirds during their security rounds.

Lighting: No new lighting changes were implemented in 2025.

Predator Control: HDOT continued to use a wildlife control contractor to conduct predator trapping at Nāwiliwili Harbor. Four traps were deployed on most days of the fledgling season for a total of 344 trap nights, which resulted in the removal of 17 predators.

Predator monitoring occurred simultaneously with downed seabird searches and predator sightings were relayed to the wildlife control contractor for adaptive trapping. After October 21, 2025, no predators were observed at the facility.

Staff Training and Outreach: Fourteen harbor staff received in-person Annual Seabird Awareness and Response Training prior to the start of fledgling season.

As in previous years, HDOT connected with Matson and Young Brothers managers to share information on the approaching fledgling season. Managers were provided with training modules and fact sheets with information on Kaua'i's seabird species, light attraction, and seabird recovery and reporting protocols for distribution to staff. Outreach and fact sheets were also provided to shore-based cruise ship staff. New signs prohibiting cat feeding were also posted.

Port Allen

Downed Seabird Searches: Searches were conducted daily by trained field biologists, 3–4 hours after sunset and within 1 hour of sunrise, throughout the entire fledgling season.

Lighting: No new lighting changes were implemented in 2025.

Predator Control: HDOT continued to use a wildlife control contractor to trap predators at the harbor. One strategically placed trap was determined to be sufficient at Port Allen. The trap remained deployed throughout the fledgling season for a total of 92 trap nights, which resulted in the removal of six predators.

Predator monitoring occurred twice daily during downed seabird searches. No predators were noted during monitoring.

Staff Training and Outreach: Ten staff received in-person Annual Seabird Awareness and Response Training prior to the start of fledgling season.

HDOT connected with vessel operators and crew members at Port Allen to share information on the approaching seabird fledging season including the impacts of bright lighting and locations of prior seabird fallout at the facility. HDOT also provided vessel operators and crew members with fact sheets containing information on Kaua'i's seabird species and seabird recovery and reporting protocols.

Prior ESRC Recommendations:

HDOT implemented the following ESRC recommendations from the April 24, 2025, KSHCP meetings.

1. Identify and implement additional adaptive management measures including further reducing lighting and increasing predator control, particularly at Līhu'e Airport to lower the current rate of 'ua'u take.

Outstanding ESRC Recommendations:

1. Explore technology regarding transponders that reduce lighting, similar to those used at other inter island airports. *Due to operational standards, implementation of this technology is not possible at Līhu'e Airport.*

Concerns:

The current rate of fledgling 'a'o take at HDOT facilities on Kaua'i exceeds the

maximum 5-year rolling average, indicating that HDOT may exceed its authorized take before the 30-year license term.

RECOMMENDATIONS:


DOFAW appreciates HDOT's ongoing minimization efforts in 2025.

DOFAW Recommendation:

1. Continue to identify and implement additional adaptive management measures including further minimizing lighting to minimize take of 'a'o and 'ua'u, particularly at Līhu'e Airport and Nāwiliwili Harbor.
2. Continue to address predator presence and cat feeding at Līhu'e Airport.

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