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March 23, 2026

Endangered Species Recovery Committee
State of Hawaiʻi
Honolulu, Hawaiʻi

SUBJECT: Division of Forestry and Wildlife Evaluation of the Auwahi Wind Project Habitat Conservation Plan Implementation During Fiscal Year (FY) 2025 and Quarters 1 and 2 of Fiscal Year 2026, and Request for ESRC Review of the Licensee's Annual Report

Dear Committee Members,

The Department of Land and Natural Resources, Division of Forestry and Wildlife (DOFAW), requests that the Endangered Species Recovery Committee (ESRC) review the Auwahi Wind Energy Project annual report in accordance with the requirements outlined in Section 195D-25, Hawaii Revised Statutes. The annual report was prepared by IRG Acquisition Holdings, LLC, on behalf of Auwahi (the licensee), as part of the obligations under the Auwahi Wind Energy Habitat Conservation Plan (HCP; TetraTech 2012) and the State Incidental Take License (ITL; ITL-17).

This submittal summarizes the FY 2025 annual report, along with Q1 and Q2 2026 reports, and includes comments from DOFAW.

BACKGROUND

ITL Licensee: Auwahi Wind Energy, LLC

Project: Eight WTGs with a total capacity of 21 MW.

ITL Duration: February 9, 2012 – February 9, 2037 (14 years/56% through the permit term)

Status of ITL: There were three reported Hawaiian hoary bat fatalities in FY 2025 and three additional fatalities in Q1 and Q2 of FY 2026. One Hawaiian petrel fatality was reported during FY 2026. No other covered species were reported during FY 2025 or

Q1 and Q2 of FY 2026. Auwahi's cumulative take estimate for Hawaiian Hoary bats is 111 (101 direct, 10 indirect) as of the end of Q2 FY 2025 (December 2025). Thirteen female bat fatalities and one of unknown sex were observed during the breeding season from monitoring performed January 2013 – December 31, 2025 (Q2 FY 2026).

Table 1. Total direct and indirect take and estimated total adjusted take since ITL issuance under the Auwahi Wind Energy ITL as of December 31st, 2025.

Common Name	Total Direct Take (Observed/ Unobserved Take[1, 2.3]	Indirect Take	Total Estimated Take	Licensed Take
Hawaiian Hoary Bat	101	10	111	140
Hawaiian Petrel	5[6]	1	6	64 adults/immatures and 23 chicks/eggs
Band-rumped Storm Petrel	1[5]	ND[4]	ND	0

[1.] Excludes takes that were incidental and not observed during systematic monitoring (incidental takes are evaluated as part of the EoA modeling software and therefore accounted for in the unobserved take).
[2.] Based on the 80% credible maximum using the following model: Dalthorp, D., M. M. P. Huso, and D. Dail. 2017. Evidence of absence (v 2.0) software user guide: U.S. Geological Survey Data Series 1055.
[3.] Includes observed take of one injured bat rehabilitated in FY 2020.
[4.] ND - Not determined
[5.] Band-rumped Storm Petrel unobserved has not been determined
[6.] Hawaiian Petrel take includes detected take at wind farm (1) and mitigation site (2).

Total Projected Take at the End of the License Term:

Auwahi Wind used EoA to project the direct take estimate of Hawaiian hoary bats for the remainder of the permit period. The direct take estimate does not include indirect take, which depends on the timing and gender of observed fatalities. The take authorization is based on a direct take estimate of 129. The results from EoA in the annual report suggest the median take prediction is approximately 152 bats (interquartile range: 144-160) in the last year of operations, 2032. The estimated Baseline Fatality Rate, calculated by EoA, is 7.29, which currently exceeds the Threshold Value of 6.45 specified in the HCP.

Avoidance and Minimization Measures Implemented:

Auwahi Wind has not observed a decrease in the fatality rate of Hawaiian hoary bats due to the installation of acoustic deterrents. They have used thermal monitoring alongside the deterrents to identify patterns in bat behavior around them, but thermal imaging shows bats continue to use the rotor-swept zone even when the deterrents are active.

The landowner has agreed to keep the cattle troughs closest to the turbines empty during periods of high bat activity, and Auwahi has coordinated with the landowner to ensure the troughs remain empty during that season. Auwahi will continue to work with the landowner, but has communicated that the landowner cannot commit to keeping the

cattle troughs empty indefinitely. In August 2025, the seasonally adjusted higher cut-in speed for August to October was voluntarily increased from 6.9 m/s to 8.0 m/s.

Mitigation Status:

Hawaiian petrel: Mitigation for the take of Hawaiian Petrels in FY 2025 included monitoring burrows with game cameras and burrow checks, evaluating reproductive success, and continuing the predator control strategy. During the 2024 management season, which falls under FY 2025 reporting, 79 burrows were protected, and 26 Hawaiian petrel chicks successfully fledged from the Kahikinui Petrel Management Area (PMA).

Hawaiian hoary bat: Auwahi's incorporation of ESRC and agency comments and feedback for the Tier 5 Site Specific Mitigation Implementation Plan (SSMIP) for the Hawaiian hoary bat was delayed throughout the 2024 calendar year. DOFAW received a revised version of the plan in January 2024 and provided a review and edits, and participated in meetings in the following months to seek Auwahi's agreement. With leadership redirecting Auwahi to work with our DOFAW HCP team during 2024, Auwahi agreed to the requested plan revisions and the costs of management actions in December 2024. The plan was reviewed for final edits and approved by the agencies in February 2025.

Based on the Auwahi Wind HCP, Tier 6 mitigation planning was initiated at the end of FY 2025. Auwahi drafted the Tier 6 mitigation plan collaboratively with the agencies. Auwahi submitted it to the ESRC for comments on February 26, 2026. Auwahi aims to seek approval by May 2026 to begin implementation before entering Tier 6 (take surpassing 115 bats).

Blackburn's sphinx moth, Hawaiian goose, and red 'ilima (*Abutilon menziesii*): mitigation fulfilled

Last Annual Review:

The ESRC made the following recommendations at the FY 2024 annual review meeting that *Auwahi incorporated* in the FY 2025 actions:

- Include deterrent specifications in the annual report.
- Report on discussions with State and Federal agencies.
- ESRC requests a meeting with the licensee in six months to report on their progress in addressing permit amendments (e.g., species not covered and high bat take).

The type of deterrents (NRG) installed at all turbines and their operational timing are included in the Auwahi FY 2025 annual report. When submitting their final revised FY 2025 Annual Report to DOFAW and USFWS, Auwahi reported the NRG Bat Deterrent

Installation details for the Auwahi turbines. This information is posted on the HCP website.

DOFAW scheduled a review meeting on February 26, 2026, for the ESRC to review and comment on the draft Tier 6 Hawaiian hoary bat mitigation plan.

Auwahi coordinated monthly update meetings with DOFAW and USFWS over the past year. Through these regular meetings, Auwahi finalized agreements and began implementing Tier 5 bat mitigation work at Kamehamenui Forest Reserve. They also drafted and incorporated feedback on the Tier 6 bat plan, which was presented to the ESRC in February 2026, and discussed mitigation options for ʻakēʻakē. Auwahi is currently developing an amendment package for ʻakēʻakē that will be ready for agency review in the coming months.

Furthermore, Auwahi installed acoustic detectors at the base of each turbine in April 2025 to help develop an informed curtailment schedule that prioritizes reducing activity during peak bat periods at the project. A preliminary report is expected in early March, covering the high-activity period through October 2025. Coordination will continue with DOFAW and USFWS on the results and next steps.

Issues & Concerns:

The FY 2025 Baseline Fatality Rate of 7.29 has again exceeded the Threshold Value of 6.45, continuing the trend seen in recent years. The average projected direct take of 152 now surpasses the licensed take limit of 140. Furthermore, Auwahi's cumulative take is quickly nearing the start of Tier 6.

There was a take of an 'akē'akē on June 15th, 2020, and no amendment to the ITL/HCP for coverage, nor has any compensatory mitigation occurred. DOFAW has had conversations with the licensee after the last annual review. As of January 2026, Auwahi committed to updating the ESRC on the amendment at the FY 2025 review and to producing a draft shortly thereafter.

AGENCY RECOMMENDATIONS:

Hawaiian hoary bat: Since Auwahi implemented feral ungulate removal and collaborated with the landowner to remove cattle water troughs in 2024, the next follow-up evaluation for adaptive management implementation will occur in February 2027. Due to the high rate of annual take of Hawaiian hoary bats and the fact that the projected take is estimated to exceed the licensed limit of 140 bats in the last tier, DOFAW recommends that Auwahi continue actions to avoid and minimize bat take as much as possible now. The actions outlined in Auwahi's revised 2025 Adaptive Management Plan include modifying ranching practices, spatially redistributing curtailment nights, shifting curtailment nights from low-risk to high-risk turbines, and adjusting curtailment timing. DOFAW suggests evaluating these actions, along with future adaptive management options listed in the plan, for immediate implementation.

Proposed future actions include reducing start-stop blade rotations at turbines, adjusting grazing schedules near turbines, and applying new deterrent technologies, including adding more deterrent units to the lower rotor-swept zone.

Band-rumped storm petrel: Due to the take of 'akē'akē in June 2020, DOFAW, in the third consecutive annual review, requests that Auwahi file a major amendment to add this covered species to the HCP/ITL and implement mitigation to provide a net benefit to the species. DOFAW also requests that Auwahi begin the amendment process now and work toward completing the amendment by the end of calendar year 2026.

If you have any questions, please reach out to our Habitat Conservation Planning Program Associate, Kinsley McEachern at laurinda.k.mceachern.researcher@hawaii.gov.

Respectfully submitted,

DAVID G. SMITH
Administrator