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March 12, 2026

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

Committee Members:

SUBJECT: Division of Forestry and Wildlife Evaluation of the Kaheawa Wind Energy II Project Habitat Conservation Plan Implementation During Fiscal Year 2025 and Quarters 1 and 2 of Fiscal Year 2026, and Request for ESRC Review of 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 Kaheawa Wind Energy II Project's annual report in accordance with the requirements outlined in Section 195D-25, Hawaii Revised Statutes. The annual report was prepared by Tetra Tech on behalf of Kaheawa Wind Farm (licensee) as part of the obligations under the Kaheawa Wind Power Habitat Conservation Plan (HCP; SWCA 2011), the HCP Amendment (2019), and the State Incidental Take License (ITL; ITL-15 amended in 2014 and 2019).

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

BACKGROUND

ITL Licensee: Kaheawa Wind Power II, LLC. TerraForm Power operates KWP II, LLC. Brookfield Renewable owns TerraForm Power.

Project: Fourteen WTGs with a total 21-MW energy generating capacity. The project is adjacent to and downslope of KWP I.

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ITL Duration: January 5, 2012 – January 30, 2032 (14 years, which is 70% of the permit term)

Status of ITL:

There was no take of HCP-covered species at KWP II in FY 2025, extending into Q1 and Q2 of FY 2026, December 2025.

Table 1. Total observed fatalities and cumulative estimated total take since ITL issuance covered under the KWP II ITL as of December 2025.

Common Name	Total Direct (Observed + Unobserved) Take ¹	Indirect Take using HCP multipliers	Total Estimated Take	Licensed Take
Nēnē	27 ²	1	28	44
ʻōpeʻapeʻa	11	1	12	38

¹ 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

² Includes one gosling fatality attributable to Project infrastructure.

Total Projected Take at the End of the Permit Term:

Hawaiian hoary bat: There's a 99.86 percent chance that the 80 percent upper confidence limit of cumulative take at the Project will not surpass the fully permitted amount during the permit term.

Nēnē: There’s a 72.1 percent chance that the 80 percent UCL of cumulative take at the Project will not go beyond the allowed limit during the permit period.

Hawaiian Petrel and Newell’s Shearwater: There has been no take of these covered species since the project began, and none are expected.

Avoidance and Minimization:

Hawaiian hoary bats: The HCP requires KWP II to perform acoustic monitoring of bat activity over the 20-year permit period. The annual detection rate trend in 2025 matched the trends seen in previous monitoring years. Low Wind Speed curtailment at 5.5 m/s is carried out each year from sunset to sunrise, from February 15 through December 15.

Nēnē: In FY 2025, there were an average of 32 trap nights per quarter for cage traps and 92 trap nights per quarter for the DOC250s. This effort removed 14 mongooses and nine feral cats.

Mitigation Status:

Hawaiian Petrel and Newell’s Shearwater: In the FY 2023 annual review, DOFAW brought to the ESRC's attention the poor condition of the Makamaka’ole Seabird Restoration/Mitigation Site and that KWP had vacated the site in this condition. KWP I

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and KWP II signed a Memorandum of Agreement (MOA) with DOFAW in September 2024, and in October 2024, issued a \$750,000 check to DOFAW to cover the cost of fence repairs. DOFAW is currently replacing the fence.

Mitigation efforts for Newell's Shearwater included overseeing two predator-free fenced enclosures, each approximately four acres, located at the Makamaka'ole site in West Maui. These enclosures featured artificial burrows and social attraction. By December 2022, both agencies concurred that KWP I and KWP II had fulfilled their project credit obligations for this species.

KWP II, in conjunction with KWP I, funded predator control and fence maintenance at the Makamaka'ole mitigation site from November 2024 through December 2025. They will continue to fund these actions annually until their license expires, per their HCP's requirements.

During FY 2020, Pūlama Lāna'i managed the Hawaiian Petrel nesting colony and predator control on Lāna'i, resulting in 36 fledglings. In February 2025, DOFAW submitted a credit letter to KWP I to confirm that KWP II had met its mitigation credits.

Hawaiian hoary bat: Mitigation for Tier 1 and Tier 2 was carried out at Kahikinui State Forest Reserve. Mitigation for Tier 3 was contracted to the U.S. Geological Survey (USGS) Hawaiian Hoary Bat Research Group. Bat ecological research on roost selection on Hawai'i Island began in FY 2018 and aims to better inform future bat habitat restoration and conservation efforts. The funding obligation was completed in 2022.

Nēnē: Mitigation involved enhancing pen habitat and infrastructure, along with concurrent management with KWP I Wind Project at the Haleakalā Ranch open release pen in FY 2025. Management at the pen included monitoring, vegetation management, fence, pond, and infrastructure maintenance, road improvements, and predator control. In April 2025, DOFAW translocated 24 birds from Kaua'i to Pu'u O Hōkū Ranch on Moloka'i. These included four groups of nēnē with 8 adults and 16 hatch-year goslings. Soon after the translocation, health checks and initial management in the pen commenced in August 2025. TerraForm, on behalf of KWP I Wind Farm, took over management of the translocated and resident nēnē at the ranch. KWP II will assume partial management of the Moloka'i-based release pen at Pu'u O Hōkū Ranch in FY 2026.

As of the end of FY 2025, KWP II has 12.60 nēnē mitigation credits.

ISSUES & CONCERNS

Nēnē:

KWP II is still behind on their nēnē mitigation credits. Currently, KWP II has 12.60 nēnē credits and is short of its Tier 3 mitigation requirements. They need to offset the 44 credits

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in their current Tier 3 of the ITL, plus 10.6 adult equivalent lost productivity credits due to delayed mitigation.

In FY 2024 and FY 2025, mitigation offsets accrued at the Haleakalā Ranch release pen were allocated to KWP I, following discussions with agencies, because the KWP I license was expiring in January 2026. KWP II is currently working with the agencies to determine future credit allocation percentages, with the goal of ensuring all licenses earn mitigation credits annually.

AGENCY RECOMMENDATIONS

Nēnē:

KWP II will need to utilize the best available science and investigate creative ways to avoid and minimize the take of nēnē. Perhaps through research involving species-informed smart curtailment measures to manage turbine speed, KWP II can reduce the risk of strikes. KWP had previously suggested GPS-tracking some of the nēnē on site to monitor their activity near the turbines. DOFAW recommends that KWP II continue to gain insight into how nēnē might become at risk of collision with the turbines. DOFAW further recommends that KWP continue managing nēnē at Haleakalā and Puu O Hōkū Ranch and allocate credits to KWP II.

If you have any questions, please contact Habitat Conservation Planning Program Associate Kinsley McEachern at laurinda.k.meachern.researcher@hawaii.gov.

Respectfully submitted,



DAVID G. SMITH
Administrator