

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

SYLVIA LUKE  
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAI'I  
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

March 12, 2026

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

**SUBJECT:** Division of Forestry and Wildlife Evaluation of the Kaheawa Wind I 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 the Endangered Species Recovery Committee (ESRC) review the Kaheawa Wind Energy I Project (KWP I) 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 of the Kaheawa Wind Power Habitat Conservation Plan (HCP; 2006) and State Incidental Take License (ITL; ITL-08).

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

**BACKGROUND**

ITL Licensee: Kaheawa Wind Power, LLC

Brookfield Renewable owns TerraForm Power, which runs KWP I.

Project: Twenty wind turbine generators (WTGs) with a total capacity of 30 megawatts (MW)

ITL Duration: January 30, 2006 – January 30, 2026 (20 years (100%) through the permit term)

**Status of ITL:** No observed fatalities at the wind farm site were reported for HCP-covered species during FY 2025 or Quarters 1 and 2 of FY 2026.

Evaluation of the Kaheawa Wind I Project HCP Implementation During FY 2025 and Q 1 and 2 of FY 2026, and Request for ESRC Review of Licensee’s Annual Report

Table 1. Total observed fatalities and estimated total take since ITL issuance under the KWP I ITL as of Q2 FY 2026, December 2025.

Common Name	Total Direct (Observed + Unobserved) Take <sup>1</sup>	Indirect Take using HCP multipliers	Total Estimated Take	Licensed Take
‘ua ‘u	19	5	24	38
Nēnē	54	2	56	60
‘Ōpe‘ape‘a	28	4	32	50

<sup>1</sup> 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.

**Avoidance and Minimization:**

**Hawaiian hoary bats:**

Low-wind-speed curtailment at 5.5 meters per second was implemented from sunset to sunrise from February 15 through December 15. The project performs site-wide assessment of bat activity via acoustic monitoring. Seasonal detection patterns were consistent with previous years and with those observed at the adjacent Kaheawa II Wind Project.

**Nēnē:** Some predator traps were repositioned to provide protection near nesting nēnē. All traps featured a gosling-entry guard to prevent injury to young nēnē. In FY 2025, the scavenger trapping program removed a total of 35 mongooses and two feral cats.

The vegetation management program in FY 2025 included one herbicide application in October 2024 and an as-needed weed-whacking program. Herbicide was applied to the cleared areas within each search plot outside of the nēnē breeding season, depending on wind and weather conditions. Remaining vegetation was trimmed with a weed whacker to maintain the annual consistency of the graded roads and pads within 70 meters of each turbine. Finally, in May 2025, encroaching ironwoods on turbine pads were removed to further reduce nēnē nesting opportunities and ensure the full extent of the cleared area could be thoroughly searched.

**Mitigation Status:**

**Hawaiian Petrel and Newell’s Shearwater:**

During the FY 2023 annual review, DOFAW informed the ESRC that the Makamaka’ole Seabird Restoration/Mitigation Site had been vacated by KWP without being maintained according to expected restoration standards. KWP I 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.

Predator control and fence maintenance at Makamaka’ole continued from November 2024 to December 2025, fulfilling the requirement to maintain both activities throughout the KWP I license term.

Evaluation of the Kaheawa Wind I Project HCP Implementation During FY 2025 and Q 1 and 2 of FY 2026, and Request for ESRC Review of Licensee's Annual Report

Mitigation for Newell's Shearwater involved managing two predator-free fenced enclosures, each about four acres, at the Makamaka'ole site in West Maui. These enclosures were equipped with artificial burrows and social attraction. In December 2022, both agencies agreed that KWP I and KWP II had fulfilled their mitigation obligations for this species.

Pūlama Lāna'i oversaw the Hawaiian Petrel nesting colony and carried out predator control on Lāna'i Island in FY 2020, leading to 36 fledglings. In February 2025, DOFAW sent a credit letter to KWP I to verify that they had fulfilled their mitigation credits.

### **Nēnē:**

Mitigation at Haleakalā Ranch continued in FY 2025 through ongoing management of the KWP II Wind Project open-release pen. Management activities included monitoring, vegetation control, infrastructure repairs (fences, ponds), road upgrades, and predator management. In April 2025, DOFAW relocated 24 nēnē from Kaua'i to Pu'u O Hōkū Ranch on Moloka'i, comprising four groups with 8 adults and 16 hatch-year goslings. After providing health checks and initial management in the pen, TerraForm took over the care of both translocated and resident nēnē in August 2025, representing KWP I and II Wind Farms, and will continue this management under their new license.

KWP I has not yet fully mitigated for Tier 1 take; however, an offset of approximately 50.3 nēnē has been achieved through Q1 FY 2026. DOFAW is working to submit a credit letter to KWP I for their nēnē credits gained in FY 2025.

### **Hawaiian hoary bat:**

The baseline Tier 1 mitigation for 20 bats was funded in 2006 and completed. For Tier 2 mitigation, KWP I also partially funded two additional Hawaiian Hoary Bat ecological research projects focusing on bats on both East Maui and Hawai'i Island. The East Maui project was contracted to H.T. Harvey, and the work on Hawai'i Island was carried out by the U.S. Geological Survey Hawaiian Hoary Bat Research Group. The Tier 2 funding obligation was fulfilled in FY 2022.

The ESRC made the following recommendations at the FY 2024 annual review meeting that are still pending for KWP I:

- Include deterrent specifications in the annual report.
- Recommend trying additional deterrent options (e.g., pheromones) to keep the nene away at the wind farm site.

KWP I currently lacks bat deterrents. The new ITL will reduce wind speed to 6.5 m/s year-round.

KWP contacted DOFAW about using deterrents for geese after the FY 2024 ESRC meeting (email sent on March 7, 2025). DOFAW recommended using dogs, like their method at the Kauai airport. However, this has not eliminated nesting birds, and DOFAW mentioned that nēnē have strong site fidelity. KWP is still collaborating with DOFAW Maui to arrange bird banding at the site, aiming to determine whether fatalities involve breeding birds or transients.

## **ISSUES & CONCERNS**

### **Nēnē:**

- KWP I is behind in their mitigation credits for nēnē, having 50.3 nēnē credits. They must mitigate for the 60 credits from the ITL plus as of FY 2025, 12.15 juveniles or 6.22 adult equivalent lost productivity credits from delayed mitigation.
- KWP received a new incidental take license in January 2026, valid through January 2051, covering approximately 25 years. This duration aligns with their Power Purchase Agreement. The covered species include the nēnē or Hawaiian goose (*Branta sandvicensis*), 'Ōpe'ape'a or Hawaiian hoary bat (*Lasiurus cinereus semotus*), 'Ua'u or Hawaiian Petrel (*Pterodroma sandwichensis*), 'A'o or Newell's shearwater (*Puffinus newelli*), 'Akē'akē or band-rumped storm petrel (*Hydrobates castro*), and the Assimulans yellow-faced bee (*Hylaeus assimulans*).

## **AGENCY RECOMMENDATIONS**

### **Nēnē:**

KWP I will need to use the best available science and explore creative ways to avoid and minimize the take of nēnē at KWP I as part of their new license. By integrating species-specific research into adaptive smart curtailment protocols, KWP I could further decrease turbine-related strike risk.

KWP previously suggested using GPS tracking for some of the nēnē on-site to monitor their activity near the turbine. DOFAW recommends that KWP investigate further how nēnē might become at risk of colliding with the turbines. DOFAW also suggests that KWP keep managing nēnē at Haleakalā and Pu'u O Hōkū Ranch and distribute credits according to KWP's approved credit allocation plan outlined in Appendix H of the new 2026 KWP I HCP, which states, "To ensure mitigation is accruing under KWP I's current obligation until it has been met (including lost productivity), and that mitigation will begin to accrue upon issuance of new permits, it is assumed that 33 percent of mitigation is allocated to KWP I's current permits and 33 percent to KWP I's obligation under the new permits (until the current mitigation obligation is fulfilled), starting in FY 2026. After meeting the current permit obligations, KWP assumes that 50 percent of mitigation will be allocated annually to the new KWP permits."

If you have any questions, please contact Habitat Conservation Planning Program Associate Kinsley McEachern at [laurinda.k.mceachern.researcher@hawaii.gov](mailto:laurinda.k.mceachern.researcher@hawaii.gov).

Respectfully submitted,



---

DAVID G. SMITH  
Administrator