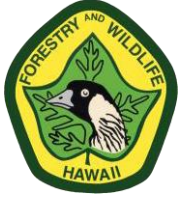
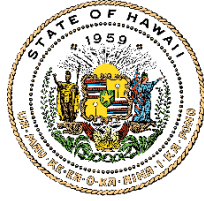


JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

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 Hōkūala Habitat
Conservation Plan Implementation During Fiscal Year 2025 and
Request for Endangered Species Recovery Committee 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 Hōkūala annual report in accordance with the requirements outlined in Section 195D-25 of the Hawai'i Revised Statutes. The annual report was prepared by AECOS Inc. on behalf of the Hōkūala Community Association (licensee) as part of the obligations under the Hōkūala Habitat Conservation Plan (HCP; Rana Biological Consulting 2012) and the State Incidental Take License (ITL; ITL-16). This submittal provides a summary of the annual report and includes comments from DOFAW.

BACKGROUND

ITL Licensee: Hōkūala Community Association

Project: Oceanfront resort covering approximately 600 acres in Līhu'e, Kaua'i.

ITL Duration: April 11, 2012 – April 11, 2042. The licensee is currently 13 years into the 30-year permit term.

Status of ITL: During fiscal year 2025 (FY 2025), the direct, incidental take of 14 birds occurred: three nēnē, nine 'alae ke'oke'o, one 'alae 'ula, and one 'a'o. Except for the 'a'o, all incidents were fatalities.

Take Summary

Table 1. The authorized, direct, indirect, and total take of covered species since ITL issuance through FY 2025.

Common Name	Type of Take	Authorized Take	Direct Take	Indirect Take	Total Take (Direct + Indirect)
Nēnē (Hawaiian goose)	Non-lethal or Lethal	17	9	4	13
Koloa maoli (Hawaiian duck)	Non-lethal or Lethal	36	6	2.45	8.45
Ae’o (Hawaiian stilt)	Non-lethal or Lethal	38	1	0	1
‘Alae ke’oke’o (Hawaiian coot)	Non-lethal	180	1	0	1
	Lethal	110	38	5.4	43.4
‘Alae ‘ula (Hawaiian gallinule)	Non-lethal	30	0	0	0
	Lethal	40	35	9.75	44.75
‘A’o (Newell’s shearwater)	Life of permit	27	12	N/A	12
‘Ua’u (Hawaiian petrel)	Life of Permit	1	0	N/A	0
‘Akē’akē (Band-rumped storm petrel)	Life of Permit	<1	0	N/A	0

Hōkūala has exceeded its permitted lethal take limit of ‘alae ‘ula. They are permitted for the lethal take of 40 ‘alae ‘ula and have taken a total of 44.75.

The licensee is also nearing their permitted take limit for nēnē. They are permitted to take 17 nēnē and have taken 13 so far.

Hōkūala is currently finalizing its draft major amendment to request additional take of ‘alae ‘ula and nēnē and will be providing this to DOFAW and USFWS by quarter four of FY 2026.

Avoidance and Minimization

Lighting:

- No new lights were installed at the property in FY 2025.

- In response to a lighting audit conducted by Kauaʻi Endangered Species Recovery Project (KESRP) in FY 2024, guard shack lights were adjusted in FY 2025.
- Hōkūala performed an internal lighting audit in September 2024, prior to the start of seabird fallout season, and noted no lighting concerns.

Construction:

- During FY 2025, grading occurred on Lots 1 and 1A (single-family housing). Both sites were inspected by the on-site biological monitor prior to grading and were monitored and inspected daily by the senior on-site biological monitor during grading.

Predator monitoring:

- Biological monitors recorded mammalian predator sightings daily. All resort staff are also instructed to report mammalian predator sightings to biological monitors in order to direct trapping efforts.
- In FY 2025, there were 5 incidents of dog predation. In one incident, a dog broke loose from its owner. The four remaining incidents were unwitnessed, and loose dogs have not been seen on the property. Hōkūala’s biological monitors and Loss Prevention staff continue to monitor for the presence of loose dogs. Staff also educate dog owners they encounter about the risk dogs pose to endangered species.

Staff Training:

- Endangered Species Awareness Trainings were provided to all personnel working on the site, regardless of company or position. A new 8-question test was added to the end of the training to check participants’ knowledge and understanding. A total of 32 classes were held, and 212 individuals were trained.
- The onsite biological monitors, Association Director, and all Loss Prevention staff were retrained in seabird search and handling techniques prior to the start of the 2024 seabird fallout season.

Roadways and signage:

- Three additional “Slow Down, Wildlife Crossing” signs were posted along a newly established golf cart path.
- Hōkūala plans to install additional “Slow Down, Wildlife Crossing” signs along roadways in FY 2026.
- Hōkūala plans to install up to seven new “Conservation Area” signs across the property during upcoming construction. Signs will include information on the endangered species present in the area and guidance on how to protect them.

Mitigation

Nēnē: Nēnē mitigation was completed per a one-time payment of \$85,000 to the DLNR Endangered Species Trust Fund in May 2012.

Ae‘o, ‘alae ke‘oke‘o, ‘alae ‘ula, and koloa maoli: Mitigation for waterbirds consists of providing and maintaining approximately 35 acres of lagoons on the property, which are an important habitat for endangered waterbird species, and predator control trapping. The licensee maintains 14 chicken traps, 10 cat/mongoose traps, 2 pig traps, 15 pig snares, 3 bullfrog traps, 2 bullfrog tadpole traps, and 2 dog traps. Traps were deployed throughout the year and placed in response to predator sightings. Set traps are checked daily. A total of 1,478 chickens, 23 cats, and 12 bullfrogs were removed from the property during the reporting period.

‘A‘o, ‘ua‘u, and ‘akē‘akē: The 2013 minor amendment to increase ‘a‘o take specified that the licensee must make an annual contribution of \$10,000 to the National Fish and Wildlife Foundation (NFWF) account to mitigate for listed seabird take. A check for \$10,000 was sent to NFWF on November 22, 2024, to cover FY 2025.

Surveys and Monitoring

Biological monitors monitored nēnē nesting activity and nesting success daily from mid-September 2024 through June 2025. Data collected included band numbers, pair bonds, nest locations, egg counts, hatched eggs, and fledged goslings. A total of 34 nests produced 82 juvenile nēnē.

DOFAW biologists, assisted by Hōkūala biological monitors, banded five adult nēnē and 80 hatch-year goslings.

Biological monitors performed waterbird counts one to two times per week, year-round. Data collected included species counts, nest locations, and the number of chicks fledged. A total of two ‘alae ke‘oke‘o, 18 ‘alae ‘ula, and 56 koloa maoli juveniles were produced in FY 2025. Biological monitors noted a decrease in the number of ‘alae ‘ula juveniles produced this year compared to previous years, possibly due to predation by ‘auku‘u.

Management of Nēnē to Reduce the Risk of Aircraft Strikes

To reduce the risk of a bird aircraft strike at Līhu‘e Airport, nēnē hazing operations utilizing trained canines have occurred regularly at Hōkūala since 2019. Hazing is conducted by the U.S. Department of Agriculture, Wildlife Services (USDA-WS) on behalf of the Hawai‘i Department of Transportation (HDOT), Airports Division. Hōkūala also plans to manage vegetation on lagoon islands in FY 2026 to discourage nēnē nesting.

DOFAW’s nēnē translocation efforts are ongoing, with the most recent translocation taking place in February 2026.

Miscellaneous

- In November 2024, KESRP surveyed an area along the property’s coastline and found approximately 180 ‘ua‘u kani (wedge-tailed shearwater) burrows. KESRP plans to survey the site throughout the upcoming 2026 nesting season.
- In May 2025, Hōkūala entered into a memorandum of agreement with Save Our

Shearwaters (SOS) to provide financial sponsorship to SOS and better facilitate the care of Hōkūala's injured birds.

FY 2024 ESRC recommendations addressed in FY 2025:

1. Ensure the HCP amendment reflects actions occurring on the property.
 - a. Continue trapping to maintain a predator-free environment. Trap where feeding/colonies occur near the property line.
 - b. Continue discussions with homeowners regarding pet containment.
2. Monitor waterbird nests and chicks to better understand population trends and predator presence, but avoid counting eggs as this can disturb nesting species.

FY 2024 ESRC recommendations ongoing or pending in FY 2025:

1. Include additional mitigation for 'alae'ula in the upcoming HCP major amendment, as take has exceeded permitted take.
2. Work towards moving birds away from the 18th hole.
3. Consider the translocation of waterbird species in future discussions.
 - a. Ideally, this would occur on Federal or State land on another island.
 - b. Ensure the translocation spot is managed for the translocated species.
 - c. Potentially have the licensee contribute to predator control efforts as part of their mitigation.
 - d. Work with the Waterbird Working Group on these efforts.
4. Aim for a zero-bullfrog environment with both egg and adult control.
 - a. Shooting is typically most effective. Recommend that control occur at night
5. Manage cattle egrets. Consider removing roosting habitat.

ISSUES & CONCERNS:

1. Hōkūala has exceeded their permitted lethal take limit of 'alae 'ula and is nearing their permitted take limit (either non-lethal or lethal) of nēnē.
2. The population of nēnē at Hōkūala remains high and poses an aircraft strike hazard risk.

CONTINUED ON PAGE 6

RECOMMENDATIONS:

DOFAW recommends Hōkūala continue to work towards addressing the ESRC's FY 2024 recommendations and looks forward to reviewing Hōkūala's draft major amendment in quarter four of FY 2026 to request additional permitted take for 'alae 'ula and nēnē.

Hōkūala should continue to work with HDOT, USDA-WS, USFWS, and DOFAW to reduce the population of nēnē on the property to reduce the risk of an aircraft strike.

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

Respectfully submitted,



DAVID G. SMITH, Administrator