



17<sup>th</sup> October, 2025

To whom it may concern,

We are submitting this letter in support of the Kaua'i Island Utility Cooperative (KIUC) Habitat Conservation Plan.

The 'a'o (Newell's Shearwater *Puffinus newelli*) and 'ua'u (Hawaiian Petrel *Pterodroma sandwichensis*) are two endangered endemic seabirds that have suffered catastrophic population crashes of 94% and 78% respectively on the island of Kaua'i between 1993 and 2013. Kaua'i is also one of the last refuges of both species, holding 90% of the World population of the 'a'o and a third of the population of 'ua'u.

Both species face a number of threats across the Hawaiian Islands, including powerline collisions and the impact of light attraction. Powerline collisions are one of the most significant threats, with thousands of birds dying on Kaua'i from collisions each year. Powerline collisions also impact multiple highly Endangered waterbird species on the island, particularly the 'alae ke'oke'o or Hawaiian Coot (*Fulica alai*), 'alae 'ula or Hawaiian Common Gallinule (*Gallinula galeata sandvicensis*), koloa maoli or Hawaiian Duck (*Anas wyvilliana*) and the Threatened Hawaiian Goose or nēnē (*Branta sandvicensis*). KIUC has produced this Habitat Conservation Plan (HCP) to address these impacts.

The HCP lays out several key minimization and mitigation strategies for addressing KIUC's take. For minimization, KIUC has already embarked on a large-scale minimization plan for the powerline grid, removing the vast majority of static lines, lowering transmission lines through reconfiguration, and adding diverters to high strike areas. This strategy is based on long-term research into avian powerline collisions that KIUC has invested in, to assess the effectiveness of multiple collision reduction methods. The thoroughness of the data that has been used in the creation of this HCP is unmatched in the published literature on avian collisions. Archipelago Research and Conservation (ARC) undertakes the annual monitoring of powerline strikes across Kaua'i to assess both the number of strikes and the effectiveness of the minimization actions. We believe that the goals laid out in the HCP are attainable and will significantly reduce powerline collisions for endangered seabirds and waterbirds.

For endangered seabird mitigation, KIUC is committing to undertaking management (through predator control and the removal of invasive plants) and monitoring at ten conservation areas in the north-west portion of Kaua'i – the area where the largest remaining populations of both species exist. ARC also undertakes the monitoring work in these colonies and over the years has clearly demonstrated (through a range of monitoring techniques for ground nesting seabirds) that the predator control regime implemented as part of the short-term HCP is highly effective, resulting in increased reproductive success rates and concomitant population increases. The HCP commits to continuing the monitoring and management at these colonies using the same techniques, and at the same level, throughout the life of the HCP. It also lays out targets that are realistic while ensuring that the ongoing breeding population increases that have occurred at each site in recent years continues during the HCP term.

Additionally, the HCP contains four social attraction sites protected by predator proof fences. Since the inception of two of these, seabird sightings inside the fences have increased rapidly and as of 2025, several pairs have initiated breeding within them. This demonstrates that social attraction – as an additional element within the HCP - clearly works and has a high chance of success. Lastly, the HCP contains a robust Adaptive Management section which lays out the various strategies that KIUC will utilize if the HCP targets are not met. This section is critical to any HCP and is robustly dealt with in KIUC's HCP.

We have been providing expertise, data and input into the creation of this HCP from its inception. In its current form we strongly feel that it clearly lays out a strategy that demonstrates how KIUC will address its take of endangered seabirds and waterbirds over the course of the 50-year HCP. These strategies have been tried and tested over multiple years, and we have shown that they are effective and have robust data to support that view. We feel that with these strategies in place, KIUC will be able to address their take and ultimately ensure that the downward trajectory both species have faced will be reversed.

We therefore support this HCP and feel that it is a critical document that will help ensure the long-term persistence of both endangered species on Kaua'i. If this HCP did not proceed, we would consider the long-term future of the 'a'o and 'ua'u on Kaua'i to be severely at risk.

Sincerely,

André Raine (Science Director), Helen Raine (Executive Director) and Marc Travers (Senior Scientist).