



Shaping the future for birds

Robyn Thorson
Regional Director, Pacific Region
U.S. Fish & Wildlife Service
911 NE 11th Ave.
Portland, Oregon 97232

March 6, 2015

Dear Regional Director Thorson:

I am writing to express the American Bird Conservancy's (ABC's) concern about the proposed Kahikinui Wind Energy Project, a 120 MW facility, planned for Department of Hawaiian Home Lands (DHHL) property on the island of Maui. This would be a much larger facility than the adjacent 21 MW Auwahi Wind Project, which is comprised of 8 turbines generating 21 MW. It is also in the vicinity of the Nakula Natural Area Reserve/Kahikinui Forest Reserve. Nakula is being restored through a collaborative effort of Hawaii's Division of Forestry and Wildlife (DOFAW), the Maui Forest Bird Recovery Project, and ABC for future translocations of the endangered Maui Parrotbill (*Pseudonestor xanthophrys*). We are unsure about the potential impact of this project on Maui Parrotbills, but that issue will need to be carefully examined during pre-construction risk assessments. Of greater concern, however, are the endangered Hawaiian Petrels (*Pterodroma sandwichensis*) that inhabit the top of Nakula/Kahikinui and the adjacent crater and summit region of Haleakalā within Haleakalā National Park that may move through the project area between their nesting sites and the ocean where they feed. Both of these species, as well as the Nēnē (*Branta sandvicensis*), will need to be carefully addressed during pre-construction risk assessment.

The presence of these species should trigger serious Endangered Species Act (ESA) concerns, as well as applications for incidental take permits and development of a Habitat Conservation Plan with appropriate mitigation under the ESA. If the project is allowed to go forward, then ABC also encourages the Service to require independent monitoring of bird deaths at the facility to ensure that losses stay within established limits. ABC views industry self-reporting as a major conflict of interest.

As pointed out in our May 22, 2014 letter to you, the numbers of recorded takes of protected species at wind energy sites in Hawaii may currently be within legal limits established by incidental take permits, but they are not trivial, and, as you know, these are likely underestimates of the actual mortality. In addition, the loss of even a few endangered species can have a negative impact on their populations. Another reason for concern is that there are additional wind energy facilities being planned for the Hawaiian Islands. ABC is concerned about the growing cumulative impact that many sites would have on the Islands' endangered endemic birds, as well as birds protected by the Migratory Bird Treaty Act.



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As you know, with wind energy, siting is critical. The Precautionary Principle should apply here, as with Hawai'i's endangered endemic birds there is little room for error. Such an approach would be highly consistent with Secretary Jewell's recently announced landscape planning and mitigation initiative.

Opposition to poorly-sited wind energy is growing among the American public. However, properly sited wind energy projects have an important place in our country's energy portfolio as we strive to reduce reliance on fossil fuels and reduce emissions of greenhouse gases. This is especially true in Hawai'i, a state with high energy costs and where a federal/state partnership is actively promoting ambitious goals for "green energy."

Thank you for your attention to this matter. ABC will be watching this situation closely. Please feel free to contact us if you have any questions or comments.

Sincerely,

Michael Hutchins, Ph.D.
Director, Bird-Smart Wind Energy Campaign

Cc: D. Ashe, L. Hadway

ABC is a 501(c) (3) not-for-profit membership organization whose mission is to conserve native birds and their habitats throughout the Americas. ABC acts by safeguarding the rarest species, conserving and restoring habitats, and reducing threats, while building capacity in the bird conservation movement.