

RECORD OF DECISION

for

Proposed Issuance of an Endangered Species Act

Section 10(a)(1)(B) Incidental Take Permit

to

Tawhiri Power, LLC

for the

Pakini Nui Wind Farm Project

U.S. Fish and Wildlife Service

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Introduction

This Record of Decision (ROD) was prepared by the U.S. Fish and Wildlife Service (Service) in accordance with the requirements of the National Environmental Policy Act of 1969 (NEPA) (42 U.S.C. § 4321 *et seq.*), as amended. The purpose of this ROD is to document the decision of the Service in response to an application submitted by Tawhiri Power, LLC (Applicant) for an Incidental Take Permit (ITP) addressing species listed under the Endangered Species Act of 1973 (ESA) (16 U.S.C. § 1531 *et seq.*), as amended. The information contained in this ROD is based on the ITP application and the submission of a supporting Habitat Conservation Plan (HCP) (SWCA 2019), the Final Programmatic Environmental Impact Statement (FPEIS) addressing this action (USFWS 2019a), and other information in the administrative record. The Service's decision to issue the ITP follows a determination that the ITP issuance criteria under section 10(a)(2)(B) of the ESA have been met. The ITP allows for the operation of the Pakini Nui Wind Farm (Project) on the island of Hawai'i, Hawai'i to occur in compliance with the ESA. The ITP and its associated HCP provide protection for and promote the conservation of the Hawaiian hoary bat, Hawaiian goose, and Hawaiian petrel (Covered Species) while enabling the Applicant to conduct otherwise lawful activities associated with the operation and decommissioning of the Project and other activities covered by the HCP.

This ROD presents the Service's permit decision and the rationale supporting the decision, identifies the reasonable range of alternatives considered in the FPEIS, and discusses whether all means to avoid or minimize environmental harm from implementation of the selected alternative have been adopted (40 C.F.R. § 1505.2).

Proposed Federal Action

The Service proposes to issue an ITP to Tawhiri Power, LLC, under the authority of section 10(a)(1)(B) of the ESA for a period of 10 years. This period covers the anticipated remaining operating life of the Project which, as of April 4, 2019, is 8 years, as well as the decommissioning stage (the period of time subsequent to end of the operating life of the Project when decommissioning and dismantling could occur). Decommissioning is further defined in Section 1.4 of the Pakini Nui Wind Farm HCP. Documents used in the preparation of this ROD include the following:

- Final HCP for Pakini Nui Wind Farm (SWCA 2019);
- Final Programmatic Environmental Impact Statement Addressing the Issuance of Incidental Take Permits for Four Wind Energy Projects in Hawai'i (USFWS 2019a)
- The Service's Biological Opinion on the HCP for Pakini Nui Wind Farm (USFWS 2019b);
- Service Findings and Recommendations for the Proposed Issuance of an ESA Section 10(a)(1)(B) ITP for the Pakini Nui Wind Farm HCP (Service 2019c)

Purpose and Need

The purpose of the Service's proposed ITP action is to fulfill our legal and conservation obligations under section 10(a)(1)(B) of the ESA in response to the Applicant's HCP Amendment and request for an amended ITP addressing the Project. The need for the proposed

Federal action is due to the likelihood that otherwise lawful activities proposed by the Applicant on the Applicant's project site will result in take of the Covered Species. Any amended permit issued by the Service must meet all applicable issuance criteria and implementation should be technically and economically feasible. *See* 16 U.S.C. § 1539(a)(2)(B); 43 C.F.R. § 46.420(b). Issuance criteria includes, without limitation, requirements that the Applicant will minimize and mitigate the impacts of the taking to the maximum extent practicable and the taking will not appreciably reduce the likelihood of survival and recovery of the species in the wild.

Project Description

The Applicant operates and maintains the Pakini Nui Wind Farm, located near South Point on the Island of Hawai'i. The current Project was installed in 2007 to replace the old Kamao'a Wind Farm. The Project is a 20.5-megawatt (MW) operating wind energy facility consisting of 14 General Electric 1.5-MW SE wind turbine generators (WTG), and began operations on April 3, 2007. Tawhiri Power LLC (Tawhiri) owns and operates the Project. A number of Project components are on leased lands. The Project wind turbine easement is 24.3 acres, the tie-line easement is 54.9 acres, and the meteorological tower easement is 0.22 acre. Together these lands comprise the Project Area, which totals 79.42 acres. The WTGs are constructed of tubular towers with a hub height of approximately 213 feet (ft); the rotor blades are approximately 230 ft in diameter and reach a maximum height of 328 ft. The WTGs are operated independently, based on individual turbine anemometry. One lattice structure meteorological tower 205 ft high is approximately 600 ft east of the middle of the turbine string. The Project uses a 6-mile-long aboveground transmission line to deliver power generated at the wind farm to the local power grid. This line is a single-conductor three-circuit line operating at 69 kilovolts (grid voltage). The Project also includes approximately 2 miles of roads, 1 mile of underground connector lines, a 1.5-acre operations and maintenance (O&M) building area, and a 1.2-acre substation.

Covered Activities discussed in the HCP are those operational and decommissioning activities within the Permit Area that could result in an incidental take of one or more Covered Species and for which Tawhiri seeks incidental take authorization. In the context of this document, decommissioning refers to site deconstruction and the removal of all aboveground facilities except for any buildings that the lessors wish to remain standing. Of the Project components and activities described the HCP, only the ongoing existence of the met tower and the existence and operation of turbines present a likelihood for an incidental take of a Covered Species. Approximately 6 miles of aboveground tie-lines connect the Project to the island's power grid is also included as a Covered Activity. These are the only Project components and activities for which Tawhiri seeks incidental take authorization. Presence and use of the O&M building and substation do not present potential effects to Covered Species. Should the project be decommissioned, the high-speed rotor lock will be engaged, stopping the rotation of the turbine blades.

The HCP includes a variety of measures to minimize effects and likelihood of take on the Covered Species. One such measure is the implementation of year-round low wind speed curtailment from 1 hour before civil sunset to one hour after civil sunrise. Turbines shut down and the blades are feathered if the 10-minute average wind speed is 5.0 m (16 feet) per second or less (cut-out wind speed) and will start back up if the 10-minute average wind speed is greater

than or equal to 5.5 m (18.0 feet) per second (cut-in wind speed). Other measures to minimize the amount of take of Covered Species include: equipping lighting with full, downward facing shielding, only using outdoor lighting in an emergency, only scheduling nighttime in an emergency, observing a speed limit of 40 km (25 mph), avoiding the creation of standing water that may attract Covered Species, and avoiding the use of barbed wire.

The mitigation associated with the HCP includes (1) restoration activities on at least 1,200 acres of degraded lowland mesic-wet ‘ōhi‘a forest for the Hawaiian hoary bat; (2) funding construction of a 7-acre fenced enclosure to provide Hawaiian goose breeding habitat; and (3) funding increased predator control activities, burrow monitoring, monitoring and maintenance of a 5-mile barrier fence encompassing 600 acres of Hawaiian petrel breeding habitat.

Plan Area

The Permit area boundary, and the corresponding area for implementation of the HCP, cover approximately 1,919 acres. The Pakini Nui Wind Farm occupies approximately 111.2 acres near South Point, Hawaii. The Plan Area also includes three areas where HCP mitigation activities will occur: (1) 1,200 acres in the Kahuku section of Hawaii Volcanoes National Park (HVNP); (2) a 5-mile barrier fence surrounding 600 acres located in HVNP; and (3) a 7 acre nene pen on Hawai‘i island.

Covered Species

The ITP would authorize incidental take of three species (Table 1). The HCP includes measures to minimize and mitigate the impacts of the taking on all Covered Species, to the maximum extent practicable, and otherwise comply with the permitting criteria of 16 U.S.C. § 1539(a).

Table 1. Covered Species under the Pakini Nui Wind Farm Habitat Conservation Plan.

| Common Name | Scientific Name | Status¹ |
|--------------------|----------------------------------|---------------------------|
| Hawaiian hoary bat | <i>Lasiurus cinereus semotus</i> | FE, SE |
| Hawaiian goose | <i>Branta sandvicensis</i> | FE, SE |
| Hawaiian petrel | <i>Pterodroma sandwichensis</i> | FE, SE |

¹Federal Endangered = FE, State Endangered = SE

Covered Activities

The Applicant seeks take authorization for WTG operation and maintenance activities occurring within the Project site, and those activities necessary to carry out all mitigation and other conservation measures identified in the HCP and/or the ITP. The Covered Activities are described in greater detail in the HCP and include activities associated with operation and maintenance of the WTGs, access roads, search plots, collector lines, decommissioning activities, implementation of mitigation, and other conservation measures. All covered activities will be implemented in accordance with the terms of the HCP and ITP.

Protection Measures and Conservation Strategies

The ITP is conditioned on implementation of the HCP. The Applicant developed its HCP with technical assistance from the Service and the Hawaii Department of Land and Natural Resources/Division of Forestry and Wildlife. Impact avoidance and minimization measures associated with the operation, maintenance, and decommissioning of the Pakini Nui Wind Farm are described in Chapter 2 of the FPEIS and in Chapter 6 of the HCP. The duration of the proposed ITP is 10 years. The conservation strategy of the HCP is intended to provide a net conservation benefit to the Covered Species through a combination of on-site and off-site measures including, without limitation, habitat protection, restoration and management for the Hawaiian hoary bat, fence maintenance and burrow monitoring for the Hawaiian petrel, and pen construction and maintenance for the Hawaiian goose.

Monitoring and Adaptive Management

Chapter 7 of the HCP addresses the monitoring and reporting program to be implemented as part of the proposed action. Chapter 8 of the HCP addresses the adaptive management approach that will be used to evaluate and respond to potential new information and changed circumstances within the plan area, and thereby ensure that the conservation measures identified in the HCP are being implemented adequately and meeting the goals and objectives outlined in the HCP.

Alternatives

The Service evaluated a range of alternatives to the proposed action. Three alternatives were analyzed in the PEIS, including a no-action alternative (Alternative 1), the Applicant's proposed Alternative (Alternative 2 or Preferred Alternative), and an Increased Curtailment Alternative (Alternative 3). Additional alternatives were also evaluated by the Service in the preparation of the FPEIS and consideration of the HCP, but were eliminated from detailed study. The alternatives eliminated from detailed study included: (1) a reduced permit term; (2) delayed permit issuance; (3) additional covered species; (4) alternative low wind speed curtailment regimes; (5) a variation of the no action alternative; and (6) nighttime shutdown from June 1 through September 15 (a variation of Alternative 3). Descriptions of these alternatives and why they were not considered for detailed study are provided in the FPEIS. The following provides brief summaries of the no-action alternative as well as the two action alternatives.

Alternative 1 (No Action)

Inclusion of the No Action Alternative in the EIS is prescribed by the Federal Council on Environmental Quality regulations (40 C.F.R. § 1502.14(d)). Under the No Action Alternative, the Service would not issue an ITP to authorize incidental take of the Covered Species and the Applicant would not implement the HCP for these species. The Applicant would continue to conduct wind energy facility operations in accordance with existing State and Federal regulations. The Applicant would remain subject to the prohibition on unauthorized taking of state and federally listed species. The Service expects the Applicant would act in a reasonable manner to avoid unauthorized take of the Covered Species. To achieve this, the Service assumes that the Applicant would shut-off wind turbine operations at night to avoid unauthorized take of Hawaiian hoary bat and minimize risk of take to the Hawaiian petrel. Because petrels have been known to fly into large obstacles, including stationary WTG's and meteorological towers, there

would be negligible difference in the anticipated effects to the petrel from any of the three alternatives evaluated. Full nighttime shutdown would be expected to result in a 50% reduction in energy production relative to operating 24 hours per day.

To avoid risk to the Hawaiian goose, the Applicant would be expected to suspend wind turbine operations during the day to avoid take of Hawaiian goose, or continue to operate and risk unauthorized take. Take of federally listed species occurring incidental to operation of the project would not be authorized and the Applicant would assume the risk of enforcement under the ESA should take occur. Under Alternative 1, no take would be authorized nor would the HCP be implemented. Conservation and beneficial activities resulting from the HCP would not occur, including habitat restoration, protection, and monitoring of Covered Species.

Alternative 2 (Proposed Action/Habitat Conservation Plan)

Under Alternative 2, the Service would issue a Permit authorizing incidental take of the Covered Species at levels described in Section 2.2.4 of the FPEIS as requested by the Applicant. Terms and conditions of the ITP would require the Applicant to implement the operational avoidance and minimization and the conservation measures described in the Project HCP. These measures were summarized in the FPEIS.

Under Alternative 2, the Applicant would implement low wind speed curtailment that would consist of operating all turbines at an individually automated 10-minute average cut-out speed of 5.0 m/s and a 10-minute average cut-in speed of 5.5 m/s from 1 hour below civil sunset to one hour after civil sunrise. The turbines would be curtailed on an individual basis as determined by on-board turbine anemometry. When curtailed, blades would be feathered.

Other conservation measures related to site management would be implemented under this action alternative, including without limitation, using shielded lighting, limiting vehicle speeds in the project area, limiting outdoor lighting and work at night to emergency use only, avoiding the creation of open water sources that may attract Covered Species, and avoiding the use of barbed wire. Alternative 2 requires off-site mitigation measures on Hawai'i island as described in Section 2.2.4 of the FPEIS and includes (1) restoration of a minimum of 1,200 acres of Hawaiian hoary bat habitat, (2) maintenance of a 5 mile barrier fence protecting a Hawaiian petrel colony, and (3) construction of a 7 acre predator-proof pen for Hawaiian geese. Combined minimization and mitigation requirements are designed to fully offset the anticipated take impacts on Covered Species.

Alternative 3 – Increased curtailment

Under Alternative 3, the increased low wind speed curtailment alternative, the Service would issue an ITP authorizing a lower level of take of the Hawaiian hoary bat than what is requested by the Applicant. Requested take of Hawaiian goose and Hawaiian petrel would be the same as Alternative 2. Under Alternative 3, WTGs would be completely shut down and the blades feathered from one hour before sunset to one hour after sunrise (complete nighttime curtailment) from April 15 through September 15, when Hawaiian hoary bat females are pregnant or rearing dependent young and bats are most active. The cessation of operations during this timeframe would result in a minimization of the take of adult Hawaiian hoary bats and eliminate indirect

take of juvenile bats. Low wind speed curtailment activities, described in Alternative 2 would be implemented during the remainder of the year (September 16 – April 14). The estimated relative energy production for Alternatives 1, 2, and 3 are approximately 50%, 80%, and 68% of the maximum energy production, respectively. Although energy production in Alternative 3 would be lower than Alternative 2, the estimated take of Hawaiian hoary bats would be approximately 39% less for the Project. Although energy production levels would generally be lower for this alternative, it is expected that maintenance operations would be the same as for all three alternatives.

Because of the lower level of estimated take of Hawaiian hoary bat, mitigation actions and would be as described in Section 2.3.4 of the FPEIS. Off-site mitigation measures on Hawai'i island would include (1) restoration of a minimum of 738 acres of Hawaiian hoary bat habitat, (2) maintenance of a 5 mile barrier fence protecting a Hawaiian petrel colony, and (3) construction of a 7 acre predator-proof pen for Hawaiian geese. Combined minimization and mitigation requirements are designed to fully offset the anticipated take impacts on Covered Species.

Decision and Rationale

The Services' decision is to select the Proposed Action (Alternative 2, described above), issue an ITP that is consistent with the take minimization, mitigation, and monitoring measures described both above and in more detail in the HCP, and to include terms and conditions in the ITP that the Service deems necessary to ensure that HCP monitoring, mitigation, financial assurance, and other Applicant' commitments are met. Issuance of the ITP authorizes the incidental take of the Hawaiian hoary bat, Hawaiian goose, and Hawaiian petrel, subject to incidental take limits and other requirements of the HCP during the 10-year term of the ITP. The Service's No Surprises Rule (50 C.F.R. § 17.22 and 17.32) would apply to the ITP.

Based on the findings in the FPEIS, our Biological Opinion (USFWS 2019b), our ESA section 10 Findings and Recommendations (USFWS 2019c), this ROD, and other information in the administrative record, the Proposed Action is not likely to appreciably reduce the likelihood of the survival and recovery of the Covered Species in the wild, and the HCP complies with the permitting standards of 16 U.S.C. § 1539(a)(1)(B). Full implementation of the Applicant's proposed HCP would meet the statutory criteria for issuance of an ITP under section 10 of the ESA. Implementation of the final HCP and issuance of the ITP best fulfills the Service's statutory mission and responsibilities while meeting the agency purpose and need to conserve listed species.

Conditions

As required by section 10(a)(1)(B) of the ESA, the ITP requires implementation of the HCP to insure that the impacts of take of the Covered Species caused by Covered Activities will be minimized and mitigated to the maximum extent practicable. These conditions for implementation of the HCP are also considered in the findings of the Service's Biological Opinion and ESA section 10 Findings and Recommendations for the Proposed Action. Any changes to the HCP shall be subject to the provisions described in Section 10.1 of the HCP. The Service will include terms and conditions necessary to ensure that 1) funding assurances are in

place before the take in a tier is authorized; 2) compliance monitoring and modeling of take estimations and projections are conducted using Service approved methods; 3) downed wildlife is handled based on the interagency guidance, and 4) reports meet the Service's requirements for content and due dates.

Environmentally Preferable Alternative

The NEPA implementing regulations at 40 C.F.R. § 1505.2(b) require that the ROD identify the alternative or alternatives that is/are considered to be "environmentally preferable," i.e., the alternative that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources, as expressed in Section 101(b) of NEPA (43 C.F.R. § 46.30). This is not necessarily the agency-preferred alternative, which the FPEIS identifies as Alternative 2 due to that action meeting the statutory requirements for permit issuance under 16 U.S.C. § 1539(a)(1)(B). The Service identifies Alternative 3 (Increased curtailment) as the environmentally preferable alternative.

The Project is built and producing renewable energy. Under Alternative 3, compliance monitoring for downed wildlife would occur and take, including take that has occurred during the permitting process and that may occur over the remainder of the permit term, would be mitigated. Because petrels have been known to fly into large obstacles, including stationary wind turbines, there would be negligible difference in the anticipated effects to the petrel from any of the three alternatives evaluated. Alternative 3 provides for mitigation of Hawaiian petrel even in the absence of take. In addition, Alternative 3 would provide for renewable energy production during the day year-round and during the night from September 16 through April 14.

Alternative 1 (No Action) would not authorize take and assumes the project would cease operation. Under this alternative, the Project would produce no renewable energy, and therefore would not contribute to reductions in greenhouse gas emissions or to meeting the State's Renewable Portfolio Standards (HRS 269-92) goals. The Applicant would be legally responsible for project-associated fatalities of federally protected species if the project continued to operate without an ITP. The No Action alternative would not provide compliance monitoring or mitigation for the take of federally protected species should the Applicant continue to operate the existing Project. The No Action Alternative would not result in the implementation of conservation measures that would benefit the Covered Species addressed in the HCP in Alternative 2.

The Service did not select Alternative 3 as the agency-preferred alternative because under section 10(a)(1)(B) of the ESA and associated FWS regulations, the Service must approve the Applicant's proposed alternative, Alternative 2, if it meets our criteria for issuance an ITP. The Service determined the Proposed Action, Alternative 2 is not likely to appreciably reduce the likelihood of the survival and recovery of the Covered Species in the wild, and the HCP complies with the permitting standards of 16 U.S.C. § 1539(a)(1)(B).

Public Involvement

Scoping

The Service published a Notice of Intent on June 1, 2018, to announce preparation of the PEIS and to solicit public comments on the scope of the PEIS. The official public comment period began June 1, 2018 and ended on July 2, 2018. Three public scoping meetings on the islands of Hawai‘i, Maui, and O‘ahu (i.e., one meeting per island) were held on June 18, June 20 and June 21, 2018, respectively. Twelve comment letters were received from stakeholders and non-profit or community organizations. A scoping report was prepared and is included as Appendix A of the FPEIS.

Based on the scoping process and internal coordination, the Service identified three major concerns, largely focused on the potential impacts to Covered Species. Concerns were raised about increased risk of local extirpation of Hawaiian hoary bat populations due to collisions with WTGs. Concerns were raised about cumulative impacts, that when added to the proposed action, would negatively affect the statewide populations for three endangered species (the Hawaiian hoary bat, Hawaiian petrel, and the Hawaiian goose). Concerns were also raised about potential harm to the threatened Newell’s shearwater (‘a‘o; *Puffinus auricularis newelli*) and the endangered band-rumped storm-petrel (‘akē‘akē; *Oceanodroma castro*) may not be fully addressed by the proposed action. The scoping process also identified issues or concerns, described in Section 1.7 of the FPEIS that were beyond the Service’s decision-making authority for this project

Draft PEIS

A Notice of Availability of the Draft PEIS (NOA 84 FR 17875-17897) was published in the Federal Register for public review on April 26, 2019 in accordance with requirements set forth in the NEPA (42 U.S.C. § 4321 et seq.) and its implementing regulations (40 C.F.R. §§ 1500–1508). Public comments on the PEIS and the Draft HCP were accepted during the 45-day Federal public comment period which ended June 10, 2019. Three public open-house meetings were held during the comment period on the islands of O‘ahu, Maui, and Hawai‘i (one on each island) on May 21, 2019, May 22, 2019, and May 23, 2019, respectively. Each public meeting included a 40 minute presentation summarizing the Draft PEIS, including an overview of issues identified during the scoping period, alternatives carried forward for further analysis, and a summary of affected resources. During the comment period, comments were accepted on the Draft PEIS and the Draft HCP. The Service received 45 comment letters, emails, or faxes including two from Federal agencies (Department of the Army, U.S. Army Garrison Hawaii; and U.S. Environmental Protection Agency, Region 9), two from State of Hawai‘i Senators (Senator Gil Riviere, District 23; Senator Glenn Wakai, District 15), three from environmental organizations (Sierra Club of Maui, Center for Biological Diversity, and American Bird Conservancy), one from a business (Ka‘u Realty), and 37 from the general public. Comments received during the public comment period include the concerns relating to:

- Hawaiian hoary bat take levels
- Hawaiian hoary bat population

- Hawaiian hoary home range/core use area
- Hawaiian cultural resources
- Hawaiian hoary bat deterrent systems
- Low wind speed curtailment
- Nighttime shutdown
- Minimizing and mitigating to the maximum extent practicable
- The Project's proposed minimization and mitigation measures
- The Project's post construction monitoring protocols for downed wildlife
- Adaptive management
- Renewable energy projects, in general
- Utility power agreements
- The Applicants proposed mitigation site for Hawaiian hoary bat
- The Applicant should fund research rather than land restoration
- Uncertainty
- Increase in take authorization of Hawaiian hoary bats may restrict military training flexibility

The Services responses to comments received were incorporated into the FPEIS and resulted in some minor modifications and clarifications in the FPEIS. No major changes were made to the HCP. A summary of substantive comments received, Service responses, and changes made to the Draft PEIS is included in Appendix K of the FPEIS and is attached to this document (Responses to Public Comments).

Final Programmatic EIS

The FPEIS was noticed in the Federal Register on August 2, 2019 (84 FR 37909-37912). During the 30-day wait period on the FPEIS, the following comment letters were received:

- An email received on August 7, 2019, advised us that the comment emails and letters received during the Draft PEIS public comment period were not attached to Appendix K. The Service corrected this oversight on August 7, 2019, by uploading the comments to the Service's FPEIS public access website.
- An email and letter were received from the U.S. Environmental Protection Agency on August 28, 2019 following up on their comments on the draft PEIS. The EPA continued to recommend that the Service consider permitting Alternative 3 (Increased Curtailment) to further minimize take of the Hawaiian hoary bat. In the ROD, the Service noted that Alternative 3 was the environmentally preferable alternative, but also noted that because Alternative 2 (Proposed Action) met Section 10(a)(1)(B) permit issuance criteria, we are required to issue the permit based on the proposed HCP action. The EPA also requested clarification between the use of "authorized take" in the draft PEIS and "anticipated take" in the final PEIS. This inconsistency was due to a lack of clarity in the draft PEIS where both existing permitted take and requested/anticipated take was referred to as "authorized take." In the final PEIS we more clearly used "authorized take" to refer to the take that was previously authorized in an existing ITP. We used "anticipated take" to refer to take that was likely to occur as a result of the implementation of an alternative being evaluated for future permit issuance.

Recommendation on Permit Issuance

Based on the foregoing findings with respect to the proposed action, I recommend approval of the issuance of Permit Number TE53063D-0 in accordance with the HCP.



Mary Abrams
Deputy Regional Director,
Interior Region 12, U.S. Fish and Wildlife Service



Date

References

- [SWCA] SWCA Environmental Consultants. 2019. Final Habitat Conservation Plan for Pakini Nui Wind Farm. Prepared for Tawhiri Power LLC.
- [USFWS] U.S. Fish and Wildlife Service. 2019a. Final Programmatic Environmental Impact Statement Addressing the Issuance of Incidental take Permits for Four Wind Energy Projects in Hawai‘i. U.S. Fish and Wildlife Service Pacific Islands Fish and Wildlife Office.
- [USFWS] U.S. Fish and Wildlife Service. 2019b. Biological Opinion on Pakini Nui Wind Farm Habitat Conservation Plan and Incidental Take Permit Application. U.S. Fish and Wildlife Service Pacific Islands Fish and Wildlife Office
- [USFWS] U.S. Fish and Wildlife Service. 2019c. Findings and Recommendations for the Proposed Issuance of an Endangered Species Act Section 10(a)(1)(B) Incidental Take Permit for the Pakini Nui Wind Farm Habitat Conservation Plan for the Operation of the Pakini Nui Wind Farm, Ka Lae, Hawai‘i. U.S. Fish and Wildlife Service Pacific Islands Fish and Wildlife Office.