

Mr. Patrick Leonard, Field Supervisor  
United States Fish and Wildlife Service  
300 Ala Moana Boulevard, Room 3-122  
Honolulu, HI 96850

Dear Mr. Leonard:

We are preparing the Final Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project (HHCTCP) and need to formally confirm that we have addressed your concerns on threatened and endangered species and critical habitat as required by Section 7 of the Endangered Species Act.

In your April 29, 2008 letter and our meeting on January 8, 2009, the main species of concern was the federally endangered Kooloaula (*Abutilon menziesii*), which occurs in the immediate vicinity of the project corridor. The development of the project area has partially been taken into account in the Service's Biological Opinion/State Habitat Conservation Plan (HCP). We understand that the City and County of Honolulu Department of Transportation Services or the Federal Transit Administration will have to obtain a Certificate of Inclusion from the Hawaii Department of Transportation (HDOT) and we (and any subsequent landowners who agree to accept transfer of the Certificate of Inclusion) must agree to and implement the terms of the plan. Your concerns regarding the proximity of the East Kapolei Station to the Kooloaula contingency reserve established by the HCP include risks associated with increased access to the contingency reserve, increased risk of fire, and increased risk of invasive plants. These will be addressed within the Final EIS and coordinated with the USFWS and the HDOT. We understand that no separate formal Section 7 consultation for the HHCTCP will be needed for the Kooloaula.

In addition, in your April 29, 2008 letter, you noted that the Hawaiian hoary bat, Hawaiian moorhen, Hawaiian coot, Hawaiian stilt and Hawaiian duck have all been observed in the vicinity of the proposed transit corridor. We have completed biological surveys and have evaluated the potential impacts on these species as part of the project. The results of the studies are documented in the Draft EIS and the Ecosystems and Natural Resources Technical Report. The Draft EIS concludes that there will be no impacts to these endangered species.

Based on the information that you have provided to us, our coordination with USFWS staff, and field observations, there will be "no effect" to threatened and endangered species or designated critical habitat related to this project. We request your concurrence that this project would not affect any listed species or critical habitat. Please contact Mr. Ted Matley at (415) 744-3133 with any questions.

Sincerely,

LESLIE T. ROGERS  
Regional Administrator

cc: City and County of Honolulu Department of Transportation Services