

In your April 29, 2008 letter to Mr. Darrell Sommerlatt of Parsons Brinckerhoff and at the January 8, 2009 meeting with DTS staff and consultants, 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 DTS is in the process of obtaining a Certificate of Inclusion from the Hawaii Department of Transportation (HDOT) and that the DTS (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 Service and the HDOT. We understand that no separate formal Section 7 consultation for the HHCTCP will be needed for the Kooloaula.