Appendix F

Agency Coordination under Section 7 of the Endangered Species Act

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DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND, PACIFIC REGION
HEADQUARTERS, UNITED STATES ARMY GARRISON, HAWAII
745 WRIGHT AVENUE, WHEELER ARMY AIRFIELD
SCHOFIELD BARRACKS, HAWAII 96857-5000

REPLY TO
ATTENTION OF:

Office of the Garrison Commander

Mr. Paul Henson
Acting Field Supervisor
US Fish and Wildlife Service
300 Ala Moana Blvd., Room 3-122
Honolulu, Hawaii 96850

Dear Mr. Henson:

This letter is to inform you that the Army is proposing to lease 8.13 acres of land at Schofield Barracks and grant a 2.5-acre interconnection easement on Schofield Barracks and Wheeler Army Airfield to the Hawaiian Electric Company to construct, operate, and maintain a 50-megawatt capacity renewable energy power plant and associated 46-kilovolt transmission line. The proposed project is referred to as the Schofield Generating Station Project. The Army requests your concurrence with our determination that this project is not likely to affect listed species or adversely modify designated critical habitat.

The Army is in the process of assessing the affects of the proposed action in accordance with the National Environmental Policy Act and the Hawaii Environmental Policy Act. The draft environmental impact statement for the project is expected to be available for public review in early 2015. A map of the proposed action is enclosed.

The purpose of the proposed action is two-fold: 1) to provide improved energy security to the U.S. Army Garrison-Hawaii at Schofield Barracks, Wheeler Army Airfield, and Field Station Kunia and 2) to provide new secure, firm, dispatchable, flexible, and renewable energy generation to the grid on Oahu, Hawaii.

The Army anticipates that six species listed as endangered under the Endangered Species Act could be affected by implementing the proposed action: Hawaiian hoary bat (*Lasiurus cinereus semotus*), nene (*Branta sandvicensis*), Hawaiian stilt (*Himantopus mexicanus knudseni*), Hawaiian coot (*Fulica americana alai*), Hawaiian common moorhen (*Gallinula chloropus sandvicensis*), and Hawaiian duck (*Anas wyvilliana*).

Hawaiian Electric has incorporated the following measures into their design to avoid effects to these listed species:

- To protect the Hawaiian hoary bat, removal or trimming of woody vegetation and trees taller than 15 feet would be done between September 16 and May 31, the period of time outside the pupping season. If tree trimming or removal were to become necessary between June 1 and September 15, Hawaiian Electric would conduct a survey of the trees marked for tree trimming or removal and those within 200 feet, utilizing monitoring techniques similar to those recently implemented by the Kauai Island Utility Cooperative. The protocol involves the use of thermal imaging equipment to identify potential roosting bats. The trees identified for removal would be monitored in the morning, prior to tree trimming or

removal, to look for warm-blooded animals. If warm-blooded animals are detected, personnel will confirm the species and will be treated as bats if confirmation is not possible. If bats are found, the tree occupied by the bat would be avoided (i.e., not removed or trimmed), if feasible. If avoidance of the tree were not feasible, Hawaiian Electric will consult with the US Fish and Wildlife Service. Personnel will be trained in accordance to a program set up and reviewed by a qualified biologist.

- Hawaiian Electric would install a system that will deter waterfowl from landing or nesting in the stormwater detention basin at the power plant, such as netting over the basin, floating "bird balls," or an equivalent system.

- Outdoor lighting would utlize cut-off lenses or shields to minimize effects on migratory birds.

The Army and Hawaiian Electric Company met with your agency on November 6, 2014, to discuss the effectiveness of these measures to avoid the potential for adverse effects on listed species. At that time, Hawaiian Electric Company was considering using barbed wire as part of the power plant fence. Since then, however, Hawaiian Electric has determined that for this particular project the use of barbed wire is unnecessary due to its location within a secured military installation. The power plant will be enclosed by a chain-link fence.

The Army is confident that these design measures will prevent adverse effects to listed species and their habitat, and has therefore determined that the project is not likely to adversely affect any listed species or modify designated critical habitat. The Army requests your agency's concurrence in this determination.

If you have any questions or would like to meet to further discuss this project, please call Ms. Michelle Mansker, Chief, Natural Resource Section, Directorate of Public Works Environmental Division at (808) 655-9189.

Sincerely,

Richard A. Fromm
Colonel, US Army
Commanding

Enclosure

New Pole on Army Land
New Pole on State Land
Existing 46kV line
Existing 46kV line Dual Circuit
Schofield Generating Station
Substations as labeled
New 46kvExpress Line
Existing 46kV line

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawai`i 96850

JAN 2 9 2015

In Reply Refer To:
2015-I-0113

Colonel Richard A. Fromm
Office of the Garrison Commander
U.S. Army Installation Management Command, Pacific Region
Headquarters, United States Army Garrison, Hawaii
745 Wright Avenue, Wheeler Army Airfield
Schofield Barracks, Hawaii 96857-5000

Subject: Informal Consultation for the Schofield Generating Station Project, O'ahu

Dear Colonel Fromm:

The U.S. Fish and Wildlife Service (Service) received your letter on December 30, 2014, requesting our concurrence with your determination that the proposed Schofield Generating Station at Schofield Barracks, O'ahu, will not adversely affect the following listed species, pursuant to the Endangered Species Act of 1973 [16 U.S.C. 1531 et seq.; 87 Stat. 884], as amended (ESA): the Hawaiian hoary bat or ope'ape'a (*Lasiurus cinereus semotus*), Hawaiian goose or nēnē (*Branta sandvicensis*), Hawaiian stilt or ae'o (*Himantopus mexicanus knudseni*), Hawaiian coot or 'alae ke'oke'o (*Fulica alai*), Hawaiian moorhen or 'alae 'ula (*Gallinula chloropus sandvicensis*), and the Hawaiian duck or koloa maoli (*Anas wyvilliana*). Prior to your letter, on November 6, 2014 the Service met with U.S. Army (Army) and Hawaiian Electric Company, Inc. (HECO) representatives to discuss the proposed Schofield Generating Station (SGS) project and ways to modify the action to reduce or remove adverse effects to listed species or critical habitats. The purpose for the SGS project is to meet the common needs of the Army and HECO for secure, reliable and renewable power generation on the island of O'ahu.

The findings and recommendations in this consultation are based on: (1) meeting conversations and email correspondences, including materials received from November 6, 2014 – January 6, 2015; (2) previous Army consultations; and (3) other biological information available to us. Copies of pertinent materials and documentation are maintained in an administrative record in the Service's Pacific Islands Fish and Wildlife Office in Honolulu, Hawai'i. This response is in accordance with section 7 of the ESA, and other authorities mandating Department of the Interior concern for environmental values.

Project Description

The Army is proposing to lease approximately 8.13 acres of land to HECO to construct, operate and maintain the Schofield Generating Station. The Army would also grant a 2.5-acre interconnection easement to HECO on Schofield Barracks and Wheeler Army Airfield for a

portion of the associated 46-kilovolt transmission line. The new 46-kilovolt transmission line would connect SGS to the island's electrical grid and would be approximately four kilometers, running primarily alongside an existing roadway. The SGS would burn biofuels, diesel, and biofuels/diesel blends. The Service provided technical assistance to HECO regarding potential impacts of fuel emissions, in a letter dated March 12, 2013 (Service File# 2013-TA-0127). Following Service recommendations to HECO, the SGS will include selective catalytic reduction equipment to control and reduce fuel emissions to meet proposed emission standards. On January 6, 2015, the Service was informed via email that the proposed project would also include a 30-foot tall meteorological tower at the facility site, required by the State of Hawaii Department of Health, Clean Air Branch and Federal Environmental Protection Agency, for related emissions monitoring.

Previous SGS project plans included the use of a three-strand barb wire fence securing the 8.13-acre facility. During our November 6, 2014 meeting, the Service recommended eliminating the use of barb wire due to potential entanglement risk to the Hawaiian hoary bat. After our November meeting, HECO determined that for this particular project the use of barb wire is unnecessary due to its location within a secured military installation. The Army confirmed in writing on December 30, 2014 that the SGS project will not include barb wire and the facility will be enclosed by a chain-link fence.

Conservation Measures

The following conservation measures are further designed to avoid or minimize effects to the listed species reviewed in this informal consultation and is considered part of the project description. Any changes to, modification of, or failure to implement these conservation measures may result in a need to reinitiate this consultation. During our November 6, 2014 meeting and confirmed in writing on December 30, 2014, you formally agreed to the following conservation measures:

- To avoid impacts to the Hawaiian hoary bat, removal or trimming of woody vegetation and trees taller than 15 feet will be done between September 16 and May 31, the period of time outside the bat pupping season. If tree trimming or removal were to become necessary between June 1 and September 15, the Army will ensure that HECO has submitted protocols to the Service and the Service has approved such protocols to survey for potential roosting bats using thermal imaging equipment, prior to any tree removal or tree trimming between June 1 and September 15.

- To avoid impacts to the Hawaiian goose, stilt, moorhen, coot, and Hawaiian duck (hereinafter collectively referred to as "Hawaiian Water birds"), the Army will ensure that the SGS facility includes the installation of netting, floating bird deterrent balls, or an equivalent system to prevent Hawaiian Water birds from landing or nesting at the SGS facility storm water detention basin.

- All outdoor lighting at the SGS facility will be fully shielded with full cut-off luminary lights.

- The 30-foot meteorological tower at the facility site will be free-standing (no guy-wires) and no lights will be used or required on the structure.

Conclusion

Based on the implementation of the above avoidance and minimization measures, the Service concurs with your determination that the construction, operation, and maintenance of the Schofield Generating Station may effect, but is not likely to adversely affect the Hawaiian hoary bat, and Hawaiian Water birds. Based on the location of the proposed project, there is no designated critical habitat at or adjacent to the proposed Schofield Generating Station project. Unless the project description changes or new information reveals that the action may affect listed species or designated critical habitat in a manner or to an extent not considered, no further action pursuant to section 7 of the ESA is necessary.

We appreciate your efforts to conserve endangered species. If you have questions regarding this letter, please contact Lasha-Lynn Salbosa, Fish and Wildlife Biologist (phone: 808-792-9400 or email: Lasha-Lynn_Salbosa@fws.gov).

Sincerely,

Aaron Nadig
O'ahu, Kaua'i, Northwestern Hawaiian Islands, and American Samoa Island Team Manager

cc: U.S. Army Garrison Hawaii, Directorate of Public Works, Environmental Division, Natural Resource Section
Hawaiian Electric Company, Inc.