

(16) *Comment*: One commenter stated that the Service should consider recovering threatened and endangered plant species in areas that are already protected and managed (e.g., Hawaii Volcanoes National Park and Hakalau National Wildlife Refuge) as these areas are pristine and free of threats and are locations where native species have made a dramatic recovery.

*Our Response*: We agree that these managed areas should be a focus for recovery actions. We have included several such areas in critical habitat on the island of Hawaii that contain the appropriate primary constituent elements for each species. However, these areas alone do not include all of the habitat essential for the conservation of the species for which critical habitat is designated on the island of Hawaii.

(17) *Comment*: The Department of Land and Natural Resources, Division of Forestry and Wildlife, a State agency, stated that the proposal did not provide information on the critical habitat proposed on other islands, did not separately map or identify how much acreage is needed for each of the populations, and did not specify how many separate populations are within each unit. As such, it did not contain enough information to evaluate the adequacy of the proposal.

*Our Response*: While the proposed rule for critical habitat on the island of Hawaii did not repeat the information contained in the critical habitat designations for the other islands, we made the data available upon request. In this rule, we have mapped each species' critical habitat and provide separate maps, acreage, and population numbers. For multiple-island species, we have included information on whether critical habitat has been designated on other islands and the number of populations allowed for, both in critical habitat and in excluded lands.

(18) *Comment*: One commenter stated that while the Navy will manage endangered species found on its property, they would not agree to the introduction of an endangered species to an area where it does not occur.

*Our Response*: No Navy lands are included in critical habitat on the island of Hawaii.

#### Issue 2: Site-Specific Biological Comments

(19) *Comment*: The Department of Land and Natural Resources, Division of Forestry and Wildlife, a State agency, asked why units Hawaii A1 and Hawaii A2 are separated.

*Our Response*: Hawaii A1 provides habitat for *Pleomele hawaiiensis*. Three other critical habitat units for this

species are designated in this rule for a total of nine populations, and excluded Kamehameha Schools lands provide habitat for one additional population (see "Analysis of Impacts Under Section 4(b)(2)"). Unit Hawaii A2 was proposed as critical habitat for one species, *Nothocestrum breviflorum*. There is habitat designated elsewhere on the island of Hawaii for this species, providing habitat for nine populations. The area between the two units is not considered essential for the conservation of either of these species.

(20) *Comment*: One commenter stated that proposed critical habitat areas for *Achyranthes mutica* (unit Hawaii B) should be plotted using a global positioning system and identified on the critical habitat maps, with the subsequent removal of any other areas.

*Our Response*: We have revised the unit to include only the gulches in this area. Ten critical habitat units, encompassing a total of 603 ha (1,491 ac), have been designated for this multi-island species. The remaining area outside of the gulches has been removed.

(21) *Comment*: The Department of Land and Natural Resources, Division of Forestry and Wildlife, a State agency, stated that unit Hawaii C contains only planted individuals of *Sesbania tomentosa* and is not considered to be critical habitat for this species. However, Lapakahi State Park in North Kohala should be considered for critical habitat.

*Our Response*: The entire area proposed for *Sesbania tomentosa* in this unit was excluded, as it is not essential to the conservation of this species because it has a lower proportion of associated native species than other areas we consider to be essential to the conservation of this species. There is critical habitat designated elsewhere on the island of Hawaii for this species that provides habitat for two populations. We have not included Lapakahi State Park in the critical habitat designation for *Sesbania tomentosa* because it was not deemed essential to the conservation of the species. There are other locations that have been designated as critical habitat in order to meet the recovery goal of 8 to 10 populations throughout its historical range on this and other islands.

(22) *Comment*: The Department of Land and Natural Resources, Division of Forestry and Wildlife, a State agency, recommended that the boundary for unit Hawaii B follow the Puu O Umi NAR boundary on the northeast side, noting that the Kohala Forest Reserve is very degraded and does not merit status as critical habitat. Another commenter

noted that unit Hawaii B contains prime and other important agricultural lands along both sides of Kohala Mountain Road.

*Our Response*: Unit Hawaii B provides habitat for six populations of *Clermontia drepanomorpha* and three populations of *Phyllostegia warshaueri* within their historical ranges. Modifications were made to this unit to exclude areas that do not contain the primary constituent elements for these species.

(23) *Comment*: One commenter suggested that unit Hawaii D be expanded to include more endangered plant species and that perhaps this could be accomplished by transferring some of the acreage allocated to unoccupied habitat in unit Hawaii D3 to occupied habitat in unit Hawaii D7. Several commenters provided information on species present within unit Hawaii D, including: *Portulaca sclerocarpa* in unit Hawaii D1; *Lipochaeta venosa* in unit Hawaii D2; *Acacia koaia* in unit Hawaii D4; the largest known population of *Lipochaeta venosa* and unoccupied habitat for *Tetramolopium arenarium* in unit Hawaii D4, and a very extensive population of *Portulaca sclerocarpa* and two populations of *Isodendron hosakae* and *Silene hawaiiensis* in unit Hawaii D7.

*Our Response*: Unit Hawaii D1 through Hawaii D8 were proposed as critical habitat for *Isodendron hosakae*, *Portulaca sclerocarpa*, and *Vigna o-wahuensis*. Habitat is provided for two populations of *Isodendron hosakae* and one population of *Vigna o-wahuensis* on the excluded lands at PTA. Modifications were made to these units to exclude areas that do not contain the primary constituent elements for these species or were considered not essential to the conservation of these species because they have a lower proportion of associated native species than other areas we consider to be essential to the conservation of these species, and there are at least eight other locations that have been designated to meet the recovery goal of 8 to 10 populations throughout their historical ranges on this and other islands. Other endangered species in this area are not part of this rulemaking.

(24) *Comment*: The Department of Land and Natural Resources, Division of Forestry and Wildlife, a State agency, suggested removing the northeast corner of unit Hawaii E that extends into Hawaiian Home Lands property as it is degraded pasture land. If the unit followed the Laupahoehoe section of the Hilo Forest Reserve boundary, it would be more accurate.