

(2) Benefits of Excluding U.S. Army Lands From Critical Habitat

When evaluating the potential negative impacts of a critical habitat designation and the potential benefits of excluding Army land from final critical habitat, the Service considered whether critical habitat designation would affect Army's military mission at PTA.

As noted above, these plants will need actions that proactively remove existing threats and that include propagation and reintroduction into unoccupied areas if they are to recover. Neither section 7 consultations nor a critical habitat designation would necessarily result in the implementation of actions needed for recovery of these species.

The Army is engaged in or has committed to engage in a wide variety of proactive conservation management activities that are set out in the "Analysis of Managed Lands Under Section 3(5)(A)" section of this rule.

The Service also considered whether a final critical habitat designation would negatively impact the Army's military mission. Overall, the Service believes it has been able to work closely and in a positive collaborative fashion with the Army to minimize potential negative impacts to the Army's military training activities as a consequence of Endangered Species Act regulation.

However, the 2nd Brigade of the 25th Infantry Division (Light) based at PTA has recently been selected to participate in the experimental "Transformation" of its force to a lighter rapidresponse force known as a Stryker Brigade Combat Team. The Army has stated that a final critical habitat designation may lead to disruption in training and a delay of construction of required training facilities if the Army has to consult on the impacts to newly designated critical habitat. The active training areas allow the troops to attain skills to respond to enemy fire quickly and accurately and to train in offensive operations. The natural and physical attributes of the training areas in Hawaii realistically mirror the battlefield conditions found in other nations in the Pacific region. As these training conditions are not found anywhere else in the continental United States, the Army states that it is imperative that the utilization of the military training installations in Hawaii not be impeded by additional requirements associated with section 7 consultations on critical habitat designations.

(3) The Benefits of Excluding Army Lands From Critical Habitat Outweigh the Benefits of Inclusion

Based on the above considerations, and in accordance with section 4(b)(2) of the Act, we have determined that the benefits to national security of excluding the Army's PTA from critical habitat, as set forth above, outweigh the benefits of including this land in critical habitat for the 12 species listed above. We have carefully weighed the relative benefits of each option.

Although these areas within Army land are removed from the final critical habitat designation, the Service still considers them essential to the conservation of these species. The number of populations for which the habitat on these installations provides is applied towards the overall recovery goal of 8 to 10 populations for each species (see discussion below), and it is anticipated that these lands will be managed under the Army's INRMP for PTA consistent with the conservation goals for these species.

(4) Exclusion of This Unit Will Not Cause Extinction of the Species

For both the three endemic (*Isodendron hosakea*, *Neraudia ovata*, and *Silene hawaiiensis*) and the nine multi-island species (*Asplenium fragile* var. *insulare*, *Hedyotis coriacea*, *Portulaca sclerocarpa*, *Silene lanceolata*, *Solanum incompletum*, *Spermolepis hawaiiensis*, *Tetramolopium arenarium*, *Vigna owahuensis*, and *Zanthoxylum hawaiiense*), the Service concludes that the Army's mission and management plan (e.g., INRMP) will provide more net conservation benefits than would be provided if these areas were designated as critical habitat. This management plan, which is described above, will provide tangible conservation benefits that will reduce the likelihood of extinction for the listed plants in these areas of the island of Hawaii and increase their likelihood of recovery. Further, all of this area is occupied by all 12 species and thereby benefits from the section 7 protections of the Act. The exclusion of these areas will not increase the risk of extinction to any of these species, and it may increase the likelihood these species will recover by encouraging other landowners to implement discretionary conservation activities as the Army has done.

In addition, critical habitat is being designated on other areas of the island of Hawaii for the three endemic species, and critical habitat has been designated elsewhere on the island, and/or designated or proposed on other islands,

for eight of the remaining nine multi-island species consistent with the guidance in recovery plans. These other designations identify conservation areas for the maintenance and expansion of the existing populations.

Critical habitat is not designated for *Tetramolopium arenarium* on the island of Hawaii because the areas containing the physical and biological features essential to the conservation of this species are on excluded lands at PTA. Critical habitat was not designated on Maui because we were not able to identify the physical and biological features that are considered essential to the conservation of this species on the island of Maui.

In sum, the above analysis concludes that the exclusion of these lands will not cause extinction and should in fact improve the chances of recovery for all 12 species.

Private Lands

Kamehameha Schools

The portion of proposed units Hawaii G, W, and Z on Kamehameha Schools lands is occupied habitat for six species: *Bonamia menziesii*, *Cyanea stictophylla*, *Delissea undulata*, *Phyllostegia racemosa*, *Phyllostegia velutina*, and *Pleomele hawaiiensis* and unoccupied habitat for three species: *Argyroxiphium kauense*, *Cyanea shipmanii*, and *Neraudia ovata*. According to our published recovery plans, recovery of these species will require reproducing, self-sustaining populations located in a geographic array across the landscape, with population numbers and population locations of sufficient robustness to withstand periodic threats caused by natural disaster or biological threats (Service 1994, 1995a, 1996a, 1996b, 1996c, 1997a, 1998a, 1998b, 1998c, 1999). The highest priority recovery tasks include active management such as plant propagation and reintroduction, fire control, nonnative species removal, and ungulate fencing. Failure to implement these active management measures, all of which require voluntary landowner support and participation, virtually assures the extinction of these species. Many of these types of conservation actions in these areas of the island of Hawaii are carried out as part of Kamehameha School's participation with landowner incentive-based programs and by actions taken on the landowner's initiative. These activities, which are described in more detail below, require substantial voluntary cooperation by Kamehameha Schools and other cooperating landowners and local residents.