

AFB will not be precluded based upon vernal pool critical habitat designation (Travis AFB, *in litt.* 2002).

(3) The Benefits of Exclusion Outweigh the Benefits of Inclusion

Based on the above considerations, and consistent with the direction provided in section 4(b)(2) of the Act, we have determined that the benefits of excluding Travis AFB as critical habitat outweigh the benefits of including it as critical habitat for vernal pool species. Further, we have determined that excluding the Travis AFB will not result in the extinction of the Conservancy fairy shrimp, the vernal pool fairy shrimp, the vernal pool tadpole shrimp, *N. colusana*, *T. mucronata*, and *L. conjugens*. If significant additional information become available that changes our analysis of the benefits of excluding compared to the benefits of including Travis AFB in the critical habitat designation, we may revise this final designation accordingly.

Beale Air Force Base

Beale AFB completed their INRMP in 1999. Within their INRMP, Beale AFB established a Vernal Pool Conservation and Management Area to protect vernal pool complexes on the western side of the base. In cooperation with Beale AFB, we agreed not to sign the INRMP and are awaiting the draft Habitat Conservation and Management Plan (HCMP) so that we can consult on both documents. Beale AFB has several substantial vernal pool complexes that support the vernal pool fairy shrimp and vernal pool tadpole shrimp, especially on the western side of the base.

The Beale AFB HCMP may be completed in 2004 depending on funding. We will consult with Beale AFB under section 7 of the Act on the development and implementation of the INRMP, HCMP and base comprehensive plan.

(1) Benefits of Inclusion

The benefits of designating critical habitat on Beale AFB are small because the vernal pool complexes on the western side of the base are already the focus of vernal pool conservation activities on the base. Beale AFB is completing the development of their HCMP to outline protection and management strategies for natural resources on the base, including vernal pool species and habitats. In addition, Beale AFB has provided private researchers and the general public opportunities for scientific and educational benefits, and controls access to the vernal pool complexes to

avoid causing inadvertent harm to the species.

(2) Benefits of Exclusion

Designating critical habitat on Beale AFB would significantly impact their ability to: (1) Fulfill present and future mission systems and taskings supporting national defense; (2) adversely impact routine operations and maintenance activities; (3) hinder improvements with the base water supply; (4) hinder the time line for construction and increase the costs associated with the proposed 350-room visitor's quarters; (5) conflict with the management of the air space to support airfield safety; (6) impair the ability to protect military aircrew, aircraft, and public safety; (7) impede essential training; and (8) limit their ability to prevent or reduce aircraft bird strikes (Beale AFB, *in litt.* 2002). Additionally, the economic costs to Beale AFB and the economy of Yuba County could be considerable as the designation of critical habitat may restrict enough future critical training missions to jeopardize the bases's viability and operational capabilities, impacting future associated economic benefits to the surrounding communities, and may affect future base closing decisions (Beale AFB, *in litt.* 2002).

The main benefit of exclusion would be ensuring that the military training activities can continue without interruption at Beale AFB while the HCMP is being completed. Additionally, future mission assignments to Beale AFB will not be precluded from the decision making process based upon vernal pool critical habitat designation (Beale AFB, *in litt.* 2002).

(3) The Benefits of Exclusion Outweigh the Benefits of Inclusion

Based on the above considerations, and consistent with the direction provided in section 4(b)(2) of the Act, we have determined that the benefits of excluding Beale AFB as critical habitat outweigh the benefits of including it as critical habitat for vernal pool species. Further, we have determined that excluding the Beale AFB will not result in the extinction of the Conservancy fairy shrimp, the vernal pool fairy shrimp, the vernal pool tadpole shrimp, *N. colusana*, *T. mucronata*, and *L. conjugens*. If significant additional information become available that changes our analysis of the benefits of excluding compared to the benefits of including Beale AFB in the critical habitat designation, we may revise this final designation accordingly.

Fort Hunter Liggett and Camp Roberts

Fort Hunter Liggett (6,519 ha (16,298 ac)) and Camp Roberts (13,247 ha (33,117 ac)) occur in San Luis Obispo and Monterey Counties. We are reviewing but have not approved INRMPs for Camp Roberts and Fort Hunter Liggett. Both bases have several substantial vernal pool complexes that support the vernal pool fairy shrimp.

(1) Benefits of Inclusion

Analysis of remote sensing data collected since 1994 suggests the loss of vernal pools in the coastal county area of California is occurring at a steady, and possibly increasing, rate. These trends are based on a recent vernal pool mapping report for Monterey, San Benito, San Luis Obispo, Santa Barbara, and Ventura Counties (Holland 2003). It is also likely that the species that depend on these habitats are also being adversely affected to an increasing degree.

We do not believe, at the present time, that the management plans on either base demonstrate how they will help recover vernal pool fairy shrimp. Additionally, the current plans do not provide an assurance of implementation, or demonstrate that proposed conservation efforts will be effective in promoting conservation.

(2) Benefits of Exclusion

At Camp Roberts, activities potentially affected include the use of field artillery pieces, range training, drop zone use, and use of tank trails or roads. Military operations in training areas with listed fairy shrimp at Fort Hunter Liggett would also be modified. One of these training areas contains a multi-purpose range complex that only occurs at four military bases in the country (FHL 2002b). Consistent access to the facility is critical because comparable facilities at other locations are scheduled for use several months to years in advance. Initiating and completing section 7 consultations that would arise from a critical habitat designation would likely result in alterations to, and delays in, training schedules at the multi-purpose range complex. If critical habitat is designated on these bases, the military would need to consider and possibly implement alternatives that modify the timing, location, and intensity of training activities. The main benefit of these 4(b)(2) exclusions is to ensure that mission-critical military training activities can continue without interruption while we continue to work with military staff to jointly refine and