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CHAR  
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APZV-FEV (12 Jul 83)  
SUBJECT: Review of Critical Habitat - Palila

DDIR

TO DICPTA

FROM DFE

DATE SEP 23 1983 CMT 3  
Mr. Char/mg/655-0691

1. Pursuant to the Endangered Species Act of 1973, as amended, formal consultation with the U.S. Fish and Wildlife Service (USFWS) was initiated concerning changes to training restrictions in Area 1 at PTA. USFWS concurrence to the following two changes is contained at Inclosure 1.

a. The number of troops authorized to move through and bivouac within the critical habitat portion of Area 1 may be increased from one company (approximately 200 men) to one battalion (approximately 500 men).

b. The number of artillery units permitted to utilize Area 1 may be increased from one battery (six guns) to one battalion (three to four batteries), with new firing points sited in the non-critical habitat portion of Area 1.

2. Request you initiate revisions to applicable training regulations.

3. We will continue to pursue the elimination of all training restrictions/delisting of critical habitat in Area 1 during the official review of the Palila Recovery Plan in FY 1984. Until officially revised or eliminated, recommend that the other training restrictions be adhered to and vigorously enforced, especially the prohibitions concerning open fires and cutting of vegetation.

Original signed by

RONALD A. BORRELLO  
Colonel, CE  
Directorate of Facilities Engineering

1 Incl  
as

CF:  
CDR, USASCH  
SJA *w/incl*  
DPT *w/incl*

*copy to ENR Species*



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

300 ALA MOANA BOULEVARD  
P. O. BOX 50167  
HONOLULU, HAWAII 96850

IN REPLY REFER TO:  
1-2-83-F-39

SEP 20 1983

Mr. R.C. Brenneman  
Acting Director of Facilities Engineering  
Headquarters, U.S. Army Support Command, Hawaii  
Fort Shafter, Hawaii 96858

Dear Mr. Brenneman:

This responds to your July 28, 1983 request for consultation under Section 7 of the Endangered Species Act of 1973, 16 U.S.C. 1531, et seq. (ESA). At issue are the possible effects of three proposed alterations in Army training which may affect listed species at the Pohakuloa Training Area (PTA) on the island of Hawaii. Those species which may be affected by the actions are:

Palila (Psittirostra bailleui)  
Haplostachys haplostachya var. angustifolia  
Stenogyne angustifolia var. angustifolia  
Lipochaeta venosa

Army actions may also affect the designated Palila Critical Habitat.

This letter represents the biological opinion of the U.S. Fish and Wildlife Service (FWS) as directed by Section 7 of the ESA, "Interagency Cooperation Regulations" (50 CFR 402, 43 FR 870), on the proposed Army actions.

On September 16, 1983 we completed our review of the information provided by you along with other related information in our files. We also contacted some of those familiar with the biology, management, and recovery of the species involved. Copies of pertinent materials and documentation are contained in an administrative record maintained in this office. Our reference number for this consultation is 1-2-83-F-39.

### BIOLOGICAL OPINION

It is our biological opinion that the three proposed actions which will alter training restrictions at PTA are neither likely to jeopardize the continued existence of the Palila or the three endangered plants at PTA listed above nor result in the destruction or adverse modification of the Palila Critical Habitat.

Background information on the proposals and biological information on the species at issue in this determination follow.



Save Energy and You Serve America!

## PROPOSAL DESCRIPTIONS AND BACKGROUND INFORMATION

The three proposals presented in your July 28 letter are summarized below:

a. In August 1978, the U.S. Army Support Command, Hawaii (USASCH) established restrictions on military training activities in Areas 1 and 6 of PTA, including those areas designated as Critical Habitat for the Palila. A map of the areas and a description of the restrictions enacted are enclosed. Restriction 11a(3) limits the number of troops using the area to one company, or approximately 200. Battalion-size units maneuvering near the area must terminate their activities at the eastern boundary of PTA and be transported by military vehicles to bivouac sites farther within the installation, but outside the Palila Critical Habitat. This element of artificiality results in training that is not completely satisfactory to the Army. Accordingly, it is proposed that the number of troops authorized to move through and bivouac within the Critical Habitat portion of Area 1 be increased from the current limit of one company to one battalion (approximately 500 troops). All other restrictions, such as prohibitions against open fires or cooking and the cutting of vegetation, will still apply.

b. It is proposed that the number of artillery units permitted to utilize Area 1 be increased from the current limit of one battery (six guns) to one battalion (three to four batteries). This will result in the need to establish one or two new firing points, but these firing points will be sited, as are the existing seven, in the non-critical habitat portion of Area 1.

c. To increase the maneuver area within PTA, it is proposed that approximately 1,500 acres located in the northwest sector of the impact area be cleared of unexploded ordnance. To facilitate this clearing, a program of controlled burning to remove covering vegetation, predominantly fountain grass, is to be initiated. Although no listed or proposed species occur in the area to be burned, Kipuka Kalawamauna, which lies just west of the area is habitat for the three listed plants mentioned previously. The controlled burning operations will be conducted in accordance with fire safety procedures and with adequate personnel and equipment.

## SPECIES ACCOUNTS

Palila. This member of the endemic Hawaiian honeycreepers (subfamily Drepanidinae) received federal recognition as an endangered species in 1967. The primary reasons for this status classification were that it no longer occupied a significant

portion of its historical range (now occupying approximately 10% of its estimated 19th century range), its present habitat was being adversely modified by the browsing of feral ungulates and its total population had decreased to an estimated low hundreds. In response to these circumstances of declining population, a critical habitat was designated for the Palila on August 11, 1977.

Originally occurring widely over the island of Hawaii, its present range is believed to be limited to the mamane-naio ecosystem above approximately 6,000 feet on Mauna Kea. Although the exact details of this decline are not well known, feral sheep browsing on mamane trees (the seeds of which are the birds' major food) is established as the major factor in the birds' decline. Because mamane provides food, nesting sites, and shelter for the Palila, the implications of the trees' decline can be easily recognized.

Haplostachys haplostachya var. angustifolia  
Stenogyne angustifolia var. angustifolia  
Lipochaeta venosa

All three plants were determined to be endangered on October 30, 1979. They are known from populations within Kipuka Kalawamauna on the island of Hawaii, although all were once more widely distributed on that island. A kipuka is a vegetated area surrounded by relatively recent lava flows. The extirpation of historic populations of these taxa has apparently been due to human disturbance, fires and the impact of feral animals and introduced weedy vegetation. The Federal Register publication determining these plants to be endangered cited trampling by military units using PTA, accidental fires touched off by military ordnance, and the introduction of exotic weed seeds by hunters and military personnel and equipment as factors adding to their decline.

#### ANALYSIS OF IMPACTS

Proposals a and b concern the Palila; proposal c, the three listed plants. As such, actions a and b will be considered together and proposal c will be discussed separately.

#### Proposals a and b

The most recent survey of Palila, conducted earlier this year, indicated that their total population may be between 2000 and 2,500 individuals. During this survey of the entire known range of the bird, none were observed in the area of consideration of this consultation. The area, although within the Palila Critical

Habitat, has shown to be consistently poor bird habitat. The area is currently used by the military for unit maneuvers and bivouac, but the Army's activities there to present have not been shown to be the cause of this paucity of Palila. Units have generally complied with fire and vegetation cutting restrictions. It is our belief that if current restrictions are continued to be strictly maintained, the increase in troop numbers using the area from approximately 200 to 500 will not be likely to jeopardize the Palila or result in the destruction or adverse modification of Palila Critical Habitat.

Likewise, we would not expect the increase in the number of firing points to have a significant effect on the Palila. Current firing does not appear to have any negative impact on the species, and the new placements will not appreciably widen the zone of sonic disturbance.

### Proposal c

Controlled burning of vegetation in the impact areas will have no immediate effect on the three listed plants at Kipuka Kalawamauna if the fire does not get out of control. It appears that adequate measures will be taken to insure, to as great a degree as is possible, that control will be maintained. It is reasonable to assume, however, that fountain grass will begin to grow again soon after this initial burning. It may, in fact, come back in denser stands and over a greater range than prior to the burn. Fountain grass is highly flammable, and with the area scheduled to be used for maneuvering, there is a high probability that fires may be started in the future. Protection of the Kipuka from such fires continues to be a major concern.

Although we are aware of the engineering difficulties involved, we remain disappointed that the firebreak planned to protect the Kipuka remains unconstructed. We have addressed this concern in previous Section 7 consultations regarding Field Training Exercises and other activities at PTA. Our February 18, 1983 letter to Colonel Borrello suggested other, less mechanically demanding, methods of firebreak construction, but these remain undone as well. Again, we stress the importance of the firebreak as a protective device at PTA.

Similarly, we continue to maintain that the elimination of routine or training-related traffic on the Kipuka is necessary for optimum fire protection. Current jeep traffic on the Kipuka, within the proposed firebreak, may itself cause fires due to sparks or heat from the vehicles' catalytic converters or from cigarettes which might be thrown from those vehicles. As proposed previously, jeep trails should be re-routed off the

Kipuka, and, if the firebreak is constructed, jeep roads should be placed on the side of that firebreak away from the Kipuka.

CONSERVATION RECOMMENDATIONS

Section 7(a)(1) of the Endangered Species Act also requires federal agencies in consultation with this Service to utilize their authorities to carry out programs for the conservation of listed species. We believe the Army has the opportunity to comply with this directive in relation to its activities within Palila Critical Habitat and near Kipuka Kalawamauna by:

1. All current restrictions on open fires and cutting of vegetation within maneuver or bivouac areas in Palila Critical Habitat must be maintained and enforced.

2. Troops should continue to be thoroughly briefed on the potential dangers of fires at PTA, with fire response plans current and firefighting equipment serviced and manned during high fire hazard periods.

3. A concerted effort should be made to complete the construction of a firebreak to protect Kipuka Kalawamauna. We are ready to help you in any way we can in that effort.

4. The rerouting of jeep traffic so as to exclude the use of Kipuka Kalawamauna should be undertaken.

This concludes formal consultation on this action. Should any significant changes be made in the proposed actions or should new species be listed which are not addressed in this letter which may be affected by the action, you must reinitiate consultation with this office.

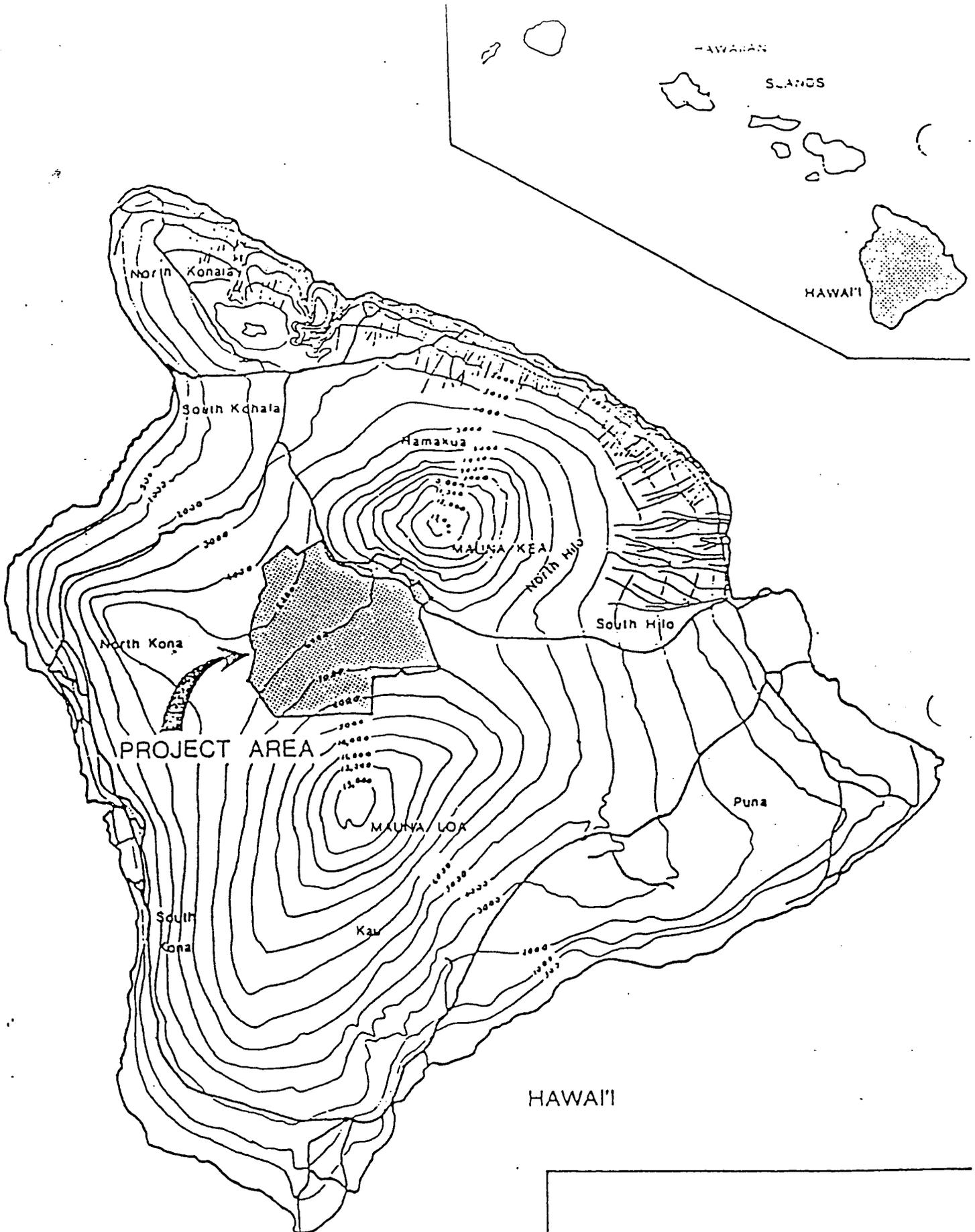
Sincerely yours,



Robert J. Shallenberger, Ph.D.  
Acting Pacific Islands Administrator

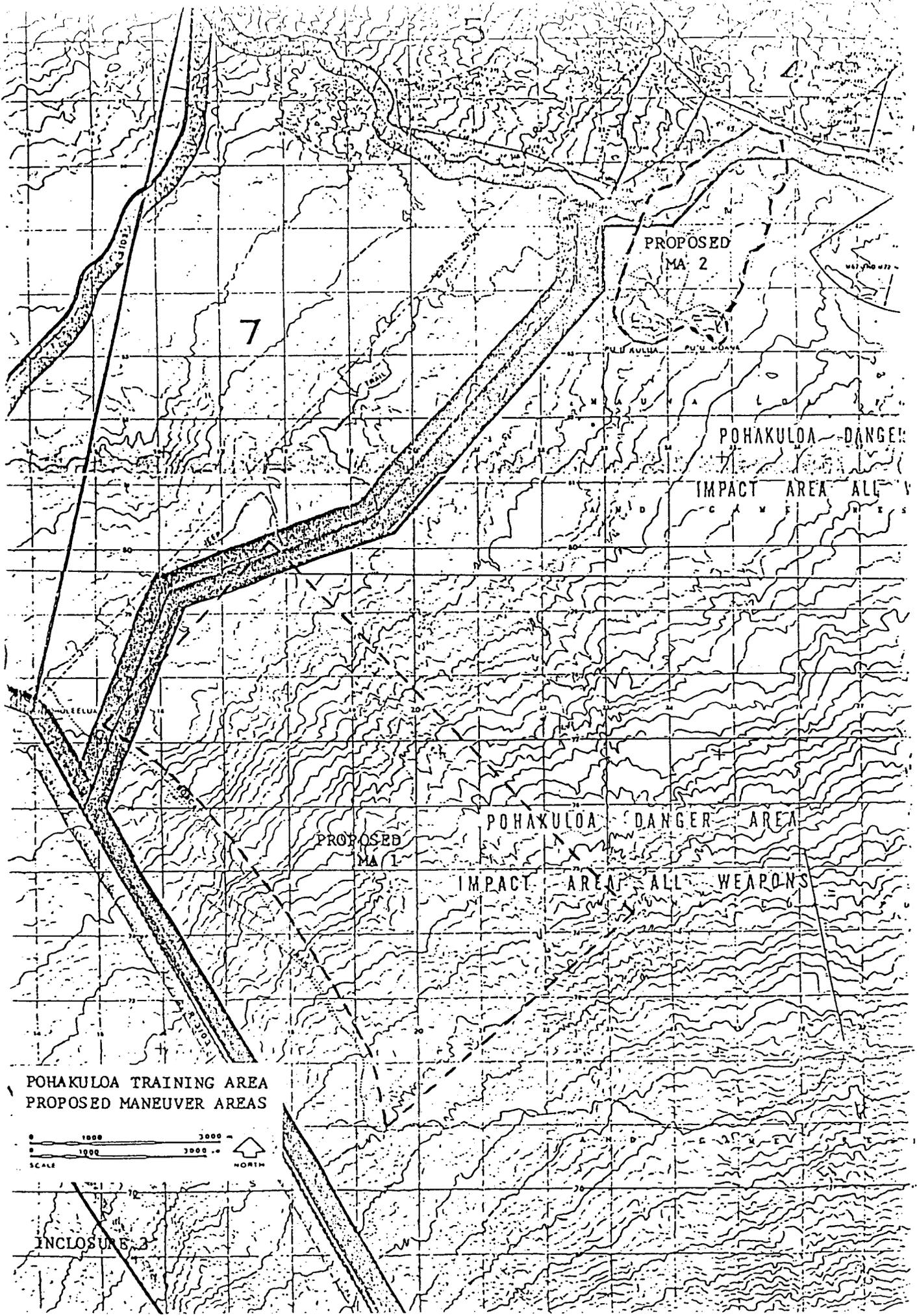
Enclosures (2)

cc: Regional Director, FWS, Portland, OR (AFA-SE)



LOCATION MAP  
POHAKULOA TRAINING AREA



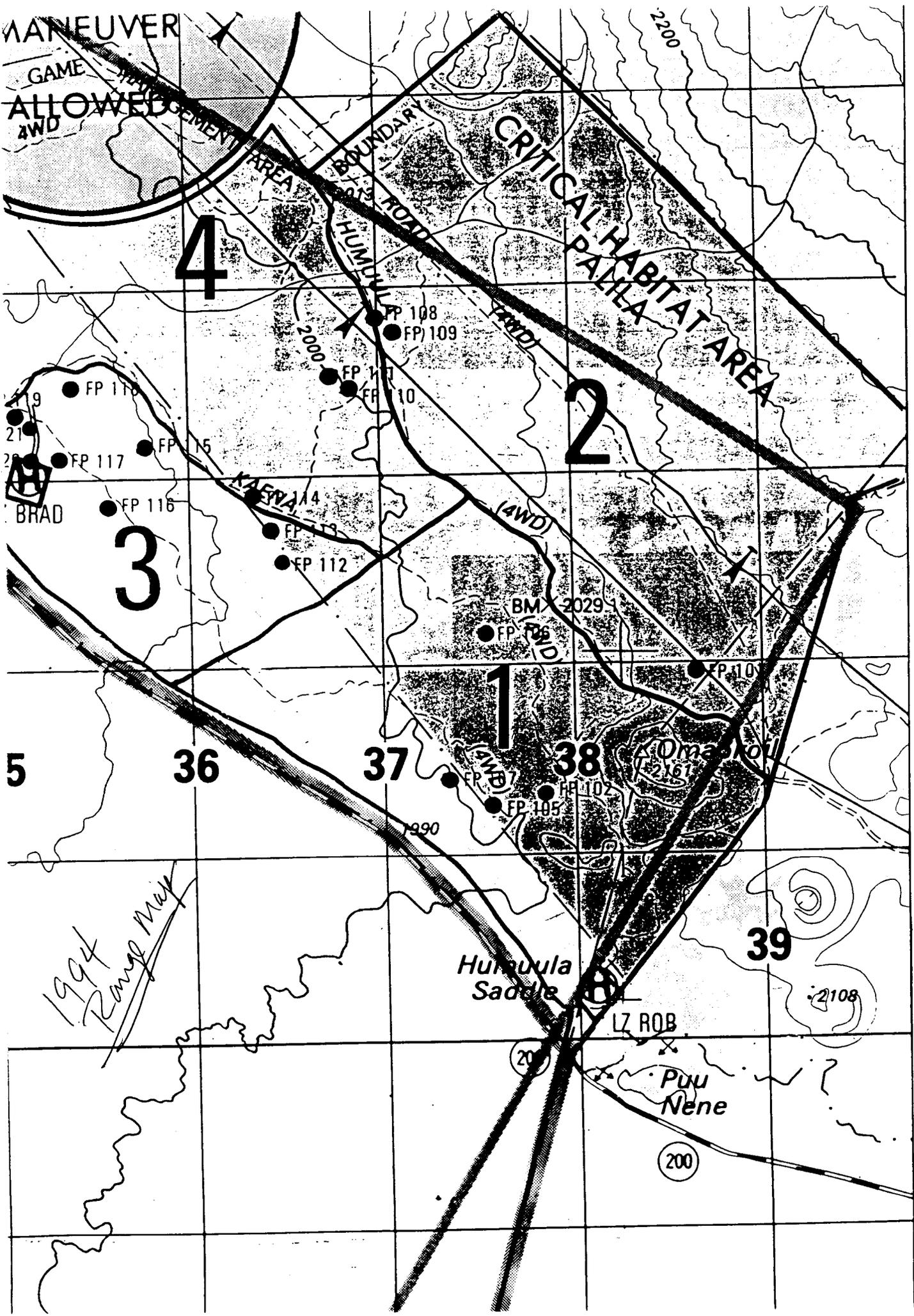


POHAKULOA TRAINING AREA  
PROPOSED MANEUVER AREAS



INCLOSURE 3

MANEUVER  
GAME  
ALLOWED  
4WD



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84

83

82

81

2180

79

4

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3

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38

39

5

36

Humuula  
Saddle

LZ ROB

Puu  
Nene

200

200

2108

BM 2029-1

Omas Koll  
2161

2000

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BOUNDARY  
HUMUULA ROAD

(4WD)

1994  
Range Map

BRAD

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\*USASCH Reg 210-11

DEPARTMENT OF THE ARMY  
HEADQUARTERS, UNITED STATES ARMY SUPPORT COMMAND, HAWAII  
Fort Shafter, Hawaii 96858

USASCH Regulation  
No. 210-11

23 November 1981

Expires 22 November 1984  
Installations

POHAKULOA RANGES AND TRAINING AREA REGULATIONS

This revision updates guidance, responsibilities, and procedures for the use of Pohakuloa Ranges and Training Areas.

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\*This regulation supersedes USASCH Reg 210-11, 23 January 1978.

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23 November 1981

(3) Ensure that the weapon and ammunition involved are retained intact.

#### 9. CONSTRUCTION AND MODIFICATION OF RANGES.

a. Construction of ranges which will result in a permanent man-made fixture is prohibited unless approved by DEH, Commander, USASCH, or DA, as applicable.

b. Modification of ranges (e.g., parapets, tank obstacles, bunkers) will not be permitted unless approved by Range Control 48 hours prior to anticipated requirement. Request must be accompanied by a 1:25,000 overlay containing the following:

- (1) Exact location of project.
- (2) Unit and OIC's name.
- (3) Proposed restoration date.

#### 10. DANGER AREAS AND IMPACT ZONES.

a. General. A description of the impact zone and its surrounding danger area is listed below. Entry into danger areas is prohibited without clearance from Range Control. The true size and shape of the impact zone and danger areas may change due to the type of exercise being conducted.

b. The PTA Danger Area is that area generally bounded on the eastern side by Redleg Trail, the northern side by Lava Road, and the western side by Kuluwa to Kona Highway to Bobcat Trail.

### Section II. ~~CRITICAL HABITAT RESTRICTIONS~~

#### 11. MANEUVER RESTRICTIONS FOR TRAINING AREAS 1 AND 6.

a. The following are restrictions that all units using areas 1 and 6 must adhere to. These restrictions apply to the green shaded areas found on the PTA map sheet (Serial W833S, Sheet 1, 1:25,000) and labeled Critical Habitat Palila.

- (1) No artillery firing from within the critical habitat.
- (2) No more than one artillery battery will fire from training areas 1 and 6 at any given time. This restriction applies to all of area 1.
- (3) Limit number of troops authorized to bivouac within the critical habitat to one company (approximately 200 troops).
- (4) Prohibit cargo helicopters from flying into the critical habitat.
- (5) Prohibit all helicopters from flying below 9,000 feet MSL within a 1,500 meter radius of the Pohakuloa Ranger Station.
- (6) Prohibit the use of pyrotechnics or simulators.
- (7) No occupation of positions or displacements during the hours of darkness.

23 November 1981

USASCH Reg 210-11

(8) Use only those existing roads and well defined trails south of Infantry Road.

(9) No cutting of vegetation and no open fires.

(10) Prohibit all refueling, food preparation, and vehicle maintenance activities within the critical habitat.

(11) Limit the number of helicopters authorized in the critical habitat to seven at any given time. The 3/4 Cavalry will be authorized 30 helicopters in the critical habitat at any given time.

b. The following restrictions are applicable to training areas 5 and 7 (Endangered Species of Plants).

(1) The area identified by the US Fish and Wildlife Service as being of "High Botanical Value" extends approximately 2,000 meters to the north and south of the old Kona Highway separating areas 5 and 7 and into the impact area around Puu's Kalua and Moana. In this area, it is essential that we prohibit the use of pyrotechnics and incendiary-type munitions to preclude the possibility of an inadvertent fire.

(2) Vehicular traffic to the firing points along the old Kona Highway will be restricted to the established road network. This does not preclude foot movement of soldiers throughout the area.

c. In addition, the Palila (Hawaiian Honeycreeper) and the Nene (Hawaiian goose) and known or suspected archaeological sites will not be disturbed.

### Section III. RESPONSIBILITIES

12. DEPUTY INSTALLATION COMMANDER, PTA (DIC PTA). DIC PTA will:

a. Support the training of units at PTA with range support, equipment, and personnel as assigned.

b. Review and approve training plans and range requests for units training at PTA.

c. Ensure compliance with all Army regulations and USASCH regulations.

d. Be the proponent for this regulation and review and update as required.

e. Be the approval authority for waivers to this regulation.

13. DIRECTORATE OF ENGINEERING AND HOUSING, USASCH. DEH, USASCH, is responsible for providing engineer technical assistance and performing maintenance for fixed ranges which are real property facilities.

14. INSTALLATION RANGE OFFICER. The Installation Range Officer will:

a. Be responsible for the enforcement of the Installation Range Safety Program (AR 385-63).