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

In Reply Refer To:
01EPIF00-2024-0054385-S7

February 28, 2024

Colonel Steven McGunegle
U.S. Army Commanding
745 Wright Avenue, Building 107
Wheeler Army Airfield
Schofield Barracks, Hawai‘i 96857-5000

Subject: Informal Consultation for 2024 Prescribed Burn at Schofield Barracks West Range, O‘ahu, Hawai‘i

Dear Colonel McGunegle:

The U.S. Fish and Wildlife Service (Service) received the Army's email on January 25, 2024, requesting consultation for a Prescribed Burn at Schofield Barracks, O‘ahu. The Army is requesting concurrence for the determination that the prescribed burn at Schofield Barracks Military Range may affect, but is not likely to adversely affect two endangered Hawaiian picture-wing flies (*Drosophila aglaia* and *Drosophila obatai*); the endangered O‘ahu ‘elepaio (*Chasiempis ibidis*) and its critical habitat (Unit 1 Northern Waianae Mountains); the endangered Hawaiian hoary bat (*Lasiurus cinereus semotus*); and the following endangered plants: *Alectryon macrococcus* var. *macrococcus*, *Asplenium dielfalcatum*, *Delissea subcordata*, *Flueggea neowawraea*, *Labordia cyrtandrae*, *Neraudia angulata* var. *angulata*, *Phyllostegia mollis*, *Platydesma cornuta* var. *decurrens*, *Pteralyxia macrocarpa*, *Schiedea hookeri*, and *Schiedea kaalae*.

The findings and recommendations in this consultation are based on: (1) your request; (2) 2024 Prescribed Fire Burn Plan (Burn Plan); 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 Endangered Species Act of 1973, as amended (ESA) (16 U.S.C. 1531 et seq.).

Project Description

The project entails implementation of a prescribed burn at Schofield Barracks West Range (SBWR) between April 17 and April 20, 2024, with alternate dates between May 12 and 18, 2024, as detailed in the Burn Plan. The purpose of the prescribed burn is three-fold: 1) protect rare species by reducing fuel loads and abate a severe wildfire hazard caused by heavy fuel

buildup, 2) provide ground visibility essential to conducting surface clearance by Explosive Ordnance Disposal personnel; and 3) provide vegetation clearance to maintain line of sight on the Battle Area Complex.

The prescribed burn area is 1,707 acres within the SBWR and within the Schofield Barracks firebreak road network. The burn will require two to three days for completion of ignition, with complete burn out of heavy fuels and smoldering lasting up to a week. The vegetation in the burn area is desiccated non-native Guinea grass (*Panicum maximum*) approximately five feet in height. The total fuel loading is approximately six tons per acre but can be up to 15 tons per acre in Guinea grass pockets that have not burned recently. Prescribed burns were conducted annually between 2011 and 2023, except for 2013, using a prescription similar to the proposed Burn Plan. The scheduled burn is contingent on weather conditions such as wind, temperature, humidity, and fuel moisture and follows the exact format and weather parameters of the prescribed burns from 2019 to 2023.

Project Minimization Measures
The prescription parameters in the Burn Plan, including fire weather and fire suppression holding force were developed using the National Fire Behavior Fuel Model N, of the National Fire Danger Rating System (NFDRS) and a guinea grass custom fuel model jointly developed by the Army and the Service. The Burn Plan includes measures to minimize spot fire occurrence and to ensure that any spot fire is contained within 93 feet (28 meters) upslope of the firebreak roads.

The Army will obtain a spot weather forecast from the National Weather Service for the prescribed fire area. The spot weather forecast will provide predicted wind speed, relative humidity, and temperature in one-hour increments for the entire duration of ignition and any additional periods of active surface fire spread.

The prescribed burn will not occur if the 10-minute average wind speed at SBWR is greater than 15 mph or when one-hour fuel moisture is below eight percent. In addition, grass outside the firebreak roads will be green (live herbaceous fuel moisture outside the burn unit will be 80 percent or higher, as calculated at the Schofield Barracks weather station (RAWS 499902)). Live herbaceous fuel moisture can be over 250 percent when grass is green and falls below 30 percent when grass is cured. At higher live fuel moisture levels, water within the grass vegetation serves as a heat sink, which slows fire spread.

The fire access roads will be maintained and cleared to bare soil, with a width of 60 feet, to serve as a physical barrier between the burn unit and sensitive habitat while also serving as access for fire defense vehicles.

The Army will implement the following measures as described in the burn plan:
1. A 300,000-gallon dip pond in close proximity to the Schofield Impact Area, will be filled to a minimum of 75 percent total capacity;
2. Three Type-6 Fire Engines will be required on-site during the burn;
3. Two Type-1 helicopters (UH-60 Blackhawk or CH-47 Chinook) with at least 660-gallon fire suppression water buckets will be on-site for immediate response (estimated 7 to 12 minutes);

4. Two additional UH-60 or CH-47 helicopters will also be on standby with two-hour response times;
5. Holding operations will include pre-watering vulnerable areas along the outside edge of the firebreak road;
6. Ignition will begin with blacklining along containment lines, once blackline established, interior ignition may produce head, backing, or flanking fire.

Consequences of the Proposed Action on Listed Species

Hawaiian picture-wing flies
The endangered *Drosophila aglaia* is known to historically occur approximately 1,150 feet (350 meters) north of the burn unit and the endangered *Drosophila obatai* is known to historically occur an estimated 1,804 feet (550 meters) north of the burn unit. In 2008, suitable habitat for *D. aglaia* and *D. obatai* was identified above the North firebreak road between markers 13 and 14. This area may contain Guinea grass, which may be prone to spot fires if winds and fuels moistures are unfavorable. The area directly above the north firebreak between markers 13 and 14 shall be sufficiently wet prior to ignition in the area. A water tender or brush truck will directly apply water to the area. An additional brush truck with 400 gallons shall support the ignition operation during the lighting phase. Two Type-1 helicopters will be available with less than a 15 minute response time. Because the proposed burn will not occur directly in areas where *D. aglaia* and *D. obatai* are known to occur, and significant planned fire suppression resources will be available in the event the burn spreads to unplanned areas, it is highly unlikely that the proposed project will impact Hawaiian pomace flies, and therefore the effects are discountable.

Oʻahu ʻelepaio and Critical Habitat
An 11,006-acre unit of occupied Oʻahu ʻelepaio critical habitat is adjacent to the western side of the North and South firebreak roads. Extra care will be taken in the gully between South Firebreak Road marker 5 and 6 because it is occupied by a pair of Oʻahu ʻelepaio. This area will be ignited early in the burn, when fire will not carry into the shaded forest cover. According to the risk assessment in the Burn Plan and confirmed by the custom guinea grass fire behavior model, there is a low probability that a spot fire will ignite outside the firebreak road. Because spot fire ignition is unlikely, the proposed action would not adversely affect any Oʻahu ʻelepaio or its critical habitat, therefore, the effects to Oʻahu ʻelepaio and its critical habitat are discountable.

Hawaiian hoary bat
Biological surveys conducted in 2012 and 2013 by the Oʻahu Army Natural Resources Program have shown that Hawaiian hoary bats readily utilize the area along the North and South firebreak for foraging and likely roosting habitat. Hoary bats are most vulnerable during their pupping season (June 1 through September 15) when non-volant young are left in roosting trees while the female forages. Any adult bats at a day roost tree within the fire area would be likely to fly unharmed to safety if their roost tree were affected by heat or smoke from the prescribed fire. The prescribed fire will not occur during the Hawaiian hoary bat pupping season. Because the proposed burn will not occur during the bat pupping season, it is not probable that the proposed project will impact Hawaiian hoary bats, and therefore the effects are discountable.

Plants
Individuals of the following endangered plant species occur within 1,640 feet (500 meters) of the prescribed burn unit: *Alectryon macrococcus* var. *macrococcus*, *Asplenium dielfalcatum*, *Delissea subcordata*, *Flueggea neowawraea*, *Labordia cyrtandrae*, *Neraudia angulata* var. *angulata*, *Phyllostegia mollis*, *Platydesma cornuta* var. *decurrens*, *Pteralyxia macrocarpa*, *Schiedea hookeri*, and *Schiedea kaalae*. Based on the most recent information available to our office, these listed plants are located on sites classified as shrub on forest fuel models, well removed from areas of flammable grass fuels. Because of the low probability of the prescribed burn to spread into unplanned areas where the listed plants occur, it is not probable that the proposed project will impact *Alectryon macrococcus* var. *macrococcus*, *Asplenium dielfalcatum*, *Delissea subcordata*, *Flueggea neowawraea*, *Labordia cyrtandrae*, *Neraudia angulata* var. *angulata*, *Phyllostegia mollis*, *Platydesma cornuta* var. *decurrens*, *Pteralyxia macrocarpa*, *Schiedea hookeri*, and *Schiedea kaalae*, and therefore the effects are discountable.

Summary
We have reviewed our data and conducted an effects analysis of your project. By incorporating the measures listed above, effects to Hawaiian picture-wing flies, Oʻahu ʻelepaio and its critical habitat, Hawaiian hoary bat, and endangered plants are extremely unlikely to occur and are therefore considered discountable. Because impacts from the action are considered discountable, the Service concurs with your determination that the proposed action may affect, but is not likely to adversely affect Hawaiian picture-wing flies (*D. aglaia* and *D. obatai*), Oʻahu ʻelepaio and its critical habitat, Hawaiian hoary bat, and the following endangered plants: *Alectryon macrococcus* var. *macrococcus*, *Asplenium dielfalcatum*, *Delissea subcordata*, *Flueggea neowawraea*, *Labordia cyrtandrae*, *Neraudia angulata* var. *angulata*, *Phyllostegia mollis*, *Platydesma cornuta* var. *decurrens*, *Pteralyxia macrocarpa*, *Schiedea hookeri*, and *Schiedea kaalae.*

Please continue to notify our wildland fire specialist, Dawn Bruns, prior to ignition on each day of the burn at telephone number (808) 927-4602 so she or our staff may opt to be on-site, in the vicinity of Schofield Barracks Range Control, on burn days.

Finally, the Service understands that the Army is preparing to submit a request to re-initiate consultation pursuant to section 7 of the ESA, for all Oʻahu Army activities. The Service recommends the Army include all training activities, including prescribed burns, as part of the current re-initiation of formal consultation.

We appreciate your efforts to conserve endangered species and their habitats. If you have any questions, please contact Ryan Peʻa, Fish and Wildlife Biologist at 808-792-9400 or ryan_pea@fws.gov and refer to this this reference number: 01EPIF00-2024-0054385-S7.

Sincerely,

LORENA WADA
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Lorena Wada
Planning and Consultation Team Manager