



Plant Extinction Prevention  
Program of Hawai'i

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Public Comments Processing  
Attn: FWS-R1-ES-2015-0125  
Division of Policy, Performance, and Management Programs  
U.S. Fish and Wildlife Service  
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Falls Church, VA 22041

November 30, 2015

To Whom It May Concern:

Thank you for the opportunity to review the document FWS-R1-ES-2015-0125. Below, please find my comments as a peer reviewer for the USFWS's proposed rule for listing 49 species in the Hawaiian Islands. I reviewed the following plant species: *Asplenium diellaciniatum*, *Gardenia remyi*, *Joinvillea ascendens* ssp *ascendens*, *Kadua haupuensis*, *Labordia lorenciana*, *Lepidium orbiculare*, *Nothocestrum latifolium*, *Phyllostegia helleri*, *Ranunculus mauiensis*, *Sicyos lanceoloideus*, and *Wikstroemia skottsbergiana*. As the Kauai Coordinator for the Plant Extinction Prevention Program, I only have expertise on these species on the island of Kauai. For species that occur on more than one island, my comments are specific to the Kauai sites. Below, I am listing my comments for each species. Several species that I reviewed do not have any comments listed because I have no additional information or corrections to give you.

*Asplenium diellaciniatum*: The elevations that I have recorded for this species are between 3600 and 3800 ft and it is generally only found on north-facing slopes. Currently, the two original sites that were listed as *Diellia erecta* f. *alexandri* are still alive and represented accurately by the numbers in the proposed listing (31 mature and 9 juveniles). However, a third site has been found in the Kawaiiki area that contains an additional 107 mature individuals. There is some debate about whether it is its own species or whether it is a morphologically extreme group of *Asplenium diellaciniatum*. The Plant Extinction Prevention Program has been conservative in its approach and is not considering the new group *A. diellaciniatum* until proposed DNA tests can confirm its identity. We are not taking A.

*diellaciniatum* off our priority list due to higher numbers until the new group's identity is confirmed in the event that the smaller sites get overlooked and then the new group turns out to be something different. The rest of the scientific community (the National Tropical Botanical Garden) is considering the third site *A. diellaciniatum*. For the purposes of your listing, you should probably consider the third site as *A. diellaciniatum* as that is likely what it will turn out to be.

*Gardenia remyi*: I believe the numbers at Kalalau may be reduced to around 6 individuals. I have been monitoring three individuals and I know there is at least one other individual there from recent communications with National Tropical Botanical Garden botanist Ken Wood. I have two other GPS points for *Gardenia remyi* in Kalalau that I have searched for, but not found. There are definitely at least four and there may be six, but 14 seems unlikely.

*Joinvillea ascendens ssp ascendens*: no comments

*Kadua haupuensis*: no comments

*Labordia lorenciana*: The threats of deer and insects (possibly a twig borer) should be added to your list.

*Lepidium orbiculare*: The threat of goats should be added to your list.

*Nothocestrum latifolium*: no comments

*Phyllostegia helleri*: There are only four individuals now. The area where they occur has been fenced by the Nature Conservancy, but not all of the animals have been removed yet.

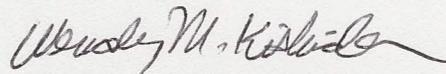
*Ranunculus mauiensis*: no comments

*Sicyos lanceoloideus*: The current locations on Kauai that I know of are one individual in Waimea Canyon, one individual in Koaie Canyon, and two individuals in Kokee State Park.

*Wikstroemia skottsbergiana*: no comments

This concludes my peer review on the USFWS's proposed rule for listing 49 species in the Hawaiian Islands. I am in full support of the listing.

Sincerely,



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