



Plant Extinction Prevention  
Program of Hawai'i

November 23, 2015

Re: FWS-R1-ES-2015-0125- Request for Scientific Peer Review of Proposal to List 49 Species from the Hawaiian Islands as Endangered

To whom it may concern:

Aloha, please find comments to the proposed FWS-R1-ES-2015-0125 below. I would like to provide comments only to those species that I have worked with on Oahu as the Oahu PEPP coordinator 2003-2004 and 2009-present.

*Cyclosorus boydiae*

1. Do you have more up-to-date information on the number and distribution for any or all of the 39 plant species in the wild and in propagation facilities?

On Oahu, we know of 2 locations within the Poamoho drainage totaling approximately 40 individuals. Historically, it was also known from the Kaluanui Drainage. It has not been observed there recently but also not surveyed for directly. It may still be present at this location.

2. Do you believe we have accurately described the threats to these 39 plant species? Do you have additional biological, commercial trade, or other data concerning threats (or lack thereof) to any or all of the 39 plant species?

This species occupies the stream banks right at or just above water level. If there are increased extreme flood events or lower baseline water levels due to climate change it will affect the continued existence of this species.

4. Is there any additional information that you believe should be considered in the proposed rule to list any of the 39 proposed plant species as endangered or threatened throughout their range?

At this time, there are no propagation or spore storage methods known for this species.

*Kadua fluviatilis*

1. Do you have more up-to-date information on the number and distribution for any or all of the 39 plant species in the wild and in propagation facilities?

OPEP conducted a survey for this species in the Helemano Drainage in 2012. No plants were seen along a significant portion of the drainage at, above, or below the gps point of last observation. We do not think this population is currently extant. Additionally, there have been no observations within the Koloa area. OPEP observed 20-25 plants in Kaipapau in 2013.

*Microlepia strigosa* var. *mauiensis*

1. Do you have more up-to-date information on the number and distribution for any or all of the 39 plant species in the wild and in propagation facilities?

The numbers of individuals are difficult to assess for the one Oahu population due to their clumped and often clonal growth habit. We currently estimate the numbers at approximately 40 individuals, although there are adjacent areas that have not been surveyed that may contain more individuals. A single individual was observed by Joel Lau in Makaha in 2012. The individual was never relocated.

*Myrsine fosbergii*

1. Do you have more up-to-date information on the number and distribution for any or all of the 39 plant species in the wild and in propagation facilities?

Cuttings of this species from Oahu were attempted and were unsuccessful in September 2014.

2. Do you believe we have accurately described the threats to these 39 plant species? Do you have additional biological, commercial trade, or other data concerning threats (or lack thereof) to any or all of the 39 plant species?

This species hybridizes with other common *Myrsine* species so numbers of individuals may actually be lower than what has been noted. Hybridization may be a threat to this species existence.

*Nothocestrum latifolium*

1. Do you have more up-to-date information on the number and distribution for any or all of the 39 plant species in the wild and in propagation facilities?

OPEP attempted to locate all known individuals of this species from 2009-2011. Only 2 live trees were observed in Central Makaleha. Both individuals have since died (2013). Therefore, no known live plants are known from Oahu and it is presumed extinct. One wild individual from Central Makaleha is represented ex situ.

2. Do you believe we have accurately described the threats to these 39 plant species? Do you have additional biological, commercial trade, or other data concerning threats (or lack thereof) to any or all of the 39 plant species?

This species is highly affected by BTB.

*Pritchardia bakeri*

1. Do you have more up-to-date information on the number and distribution for any or all of the 39 plant species in the wild and in propagation facilities?

The Kahuku area has not been extensively surveyed for this species however, I feel the estimated numbers of ~250 for this species is somewhat high. I would estimate many fewer plants than 100 total. In the Oio drainage area there could be 50-75 plants (observed 2010). In the southern Koolaus the numbers are much lower. We observed ~15 plants in the Kupaua drainage near the summit in 2013.

*Sicyos lanceoloideus*

1. Do you have more up-to-date information on the number and distribution for any or all of the 39 plant species in the wild and in propagation facilities?

The information is accurate on the numbers of individuals however many of the populations have not been observed in several years. There are 5 locations on Oahu.

*Stenogyne kaalae var. sherfii*

1. Do you have more up-to-date information on the number and distribution for any or all of the 39 plant species in the wild and in propagation facilities?

This species is still believed to be extinct in the wild. There are 2 reintroduced populations in Opaepala and Poamoho areas.

Thank you for the chance to comment on this listing package. I fully support the listing of all 49 species.

Mahalo,

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