



University of Hawaii at Manoa

Environmental Center

A Unit of Water Resources Research Center
Crawford 317 • 2550 Campus Road • Honolulu, Hawaii 96822
Telephone: (808) 956-7361

April 27, 1992
RG:0108

Regional Director (FWE-SE), Region 1
U. S. Fish and Wildlife Service
Eastside Federal Complex
911 NE 11th Avenue
Portland, Oregon 97232-4181

Dear Sir:

Endangered and Threatened Species 50 CFR 56882 November 6, 1991

In accordance with the Endangered Species Act of 1973 as amended, the U. S. Fish and Wildlife Service is required to review the Lists of Endangered and Threatened Wildlife and Plants at least once every 5 years. The Environmental Center of the University of Hawaii has reviewed this 5-year FWS Review, (Federal Register Vol. 56, No. 215, November 6, 1991) with the assistance of Sheila Conant, General Science; and Bill Cameron, Environmental Center.

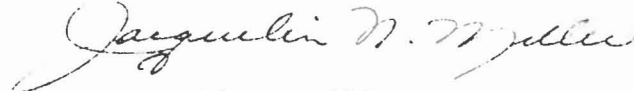
We note that Hawaii is well represented in this current 5-year review process. We did not find any inconsistencies between the federal register and the current information available on endangered and threatened species in Hawaii.

We would like to bring one important point to your attention. Critical habitat for our endangered and threatened species in Hawaii is constantly being threatened or lost either by development or natural erosional/depositional forces. We have noted with great concern the recent move by Washington to modify the definition of Wetlands that would significantly jeopardize many of the wetland areas of concern in Hawaii. Because species can not survive if their habitat is lost or reduced to a non-viable foraging/breeding area, we strongly urge that any definition of wetland that results in a loss of wet land should be carefully weighed and its loss to the ecosystem be evaluated prior to any change in the definition. Furthermore, we also urge that the definition of wetland be based on the site [or State] specific needs of the area. Just as one type of zoning may be suitable for Washington D.C., similar zoning might not be appropriate for an island state such as Hawaii. We urge that diligent attention be given to the protection of habitats so that these endangered or threatened species can have a place to call home!

U. S. Fish and Wildlife Service
April 27, 1992
Page 2

Please keep us abreast on new listings as they occur. We appreciate the opportunity to review this document and offer our comments. We look forward to reviewing other documents on this topic as they become available.

Sincerely,

A handwritten signature in cursive script, reading "Jacquelin N. Miller".

Jacquelin N. Miller
Associate Coordinator

cc: Roger Fujioka
Bill Cameron
Sheila Conant
John Harrison