



University of Hawaii at Manoa

Environmental Center
Crawford 317 • 2550 Campus Road
Honolulu, Hawaii 96822
Telephone (808) 948-7361

RL:0892

HB 2107 RELATING TO ENDANGERED SPECIES

Statement for House Committee on
Planning, Energy and Environmental Protection
March 1, 1990

By
Jacquelin Miller, Environmental Center
Clifford Smith, Botany
William Grannis, Environmental Center

HB 2107 seeks to address a serious problem in the protection of endangered or threatened species by defining the critical habitat for this species and instructing the Department of Land and Natural Resources to designate appropriate areas as critical habitat.

Our statement on this bill does not represent an institutional position of the University of Hawaii.

The amendments to HRS 195-D as are proposed in HB 2107 reflect the recommendations of those familiar with the problems facing the protection of endangered species. Hence, we concur with the general intent and language of the bill. We do, however, call your attention to a provision that may significantly jeopardize the purpose of the amendment. Page 3, line 16, requires that the economic impact, along with other relevant impacts, be taken into consideration prior to the designation of a critical habitat. Economic impact assessments are extremely difficult to conduct because of the intrinsic difficulty of comparing various tangible monetary development options with frequently less monetarily definable environmental needs. It is our understanding that the US Fish and Wildlife Service has essentially stopped conducting such assessments in Hawaii because of the difficulty in carrying out objective economic analyses. We believe it is important to keep the endangered species law in its proper perspective...was it promulgated on the basis of a need to protect certain endangered or threatened species or is it merely another hurdle to be contended with by development practices?

We are not suggesting that no impact assessments be conducted prior to designation of critical habitats, but we do urge that the specific language in the present bill that specifically references the need for economic considerations in critical habitat designations seems likely to jeopardize the issuance of those designations. We suggest amendment of lines 16 and 17 to read:

~~taking into consideration the [economic impact and any other] relevant impacts of specifying any particular area as critical habitat.~~