

Furthermore, many of the assumptions and much of the analysis in the UH study are not transferable to the economic analysis for the plants critical habitat. For example, the value of water recharge in the UH study reflects projected water supply and demand conditions on Oahu—an island which is nine percent larger than Kauai but has a population of more than 12 times that of Kauai. Also, the UH benefit analysis of reducing soil runoff is unique to three valleys that drain through partially channelized streams in urban areas into the manmade Ala Wai Canal. Since this canal was designed with inadequate flushing from stream or ocean currents, it functions as an unintended settling basin so must be dredged periodically. In addition, the recreational and ecotourism values provided in the UH study apply to areas that are accessible to most hikers, which is not the case with most of the plants critical habitat. As mentioned in the DEA, most of the plants critical habitat units are located in the mountainous interior of Kauai. Much of the proposed critical habitat has steep slopes, remote locations, and difficult access; some of the units are accessible only by helicopter and are rarely visited.

Chapter VI, section 6.c. of the DEA discusses a potential benefit of critical habitat to developers. By knowing the critical habitat boundaries, developers can site projects outside the boundaries, thereby avoiding certain issues related to threatened and endangered species. As such, the benefit is not circular, because, as a result of critical habitat, developers can avoid take issues associated with section 9 of the Act and the other baseline regulations protecting listed species discussed in Chapter IV of the DEA.

(82) *Comment:* Several commenters stated the following: Existence values should be quantified. Studies referenced in the analysis contain information about how much people would be willing to pay to save various species. Even assuming plants are non-charismatic and therefore would justify lower values, there would still be a value of \$6 per household per year. If the study is able to take values for a day of hunting from the State of Idaho and apply them to Hawaii, it should be equally able to take values from studies which have looked at other species to get some sense of what people would pay to make sure these species recover and do not go extinct.

*Our Response:* When primary research on benefits is not feasible, economists frequently rely on the method of benefits transfer. Benefits transfer involves application of results

of existing valuation studies to a new policy question. Two core principals of defensible benefits transfer are (1) the use of studies that apply acceptable techniques to generate welfare values, and (2) similarity between the good being valued in the literature and the good being valued in the policy context to which the transfer is being made (i.e., the protection afforded the plants by critical habitat). No known studies exist on quantified data on the value of plants. Therefore, applying results of existing valuation studies on non-plants to the Kauai plants is not feasible.

(83) *Comment:* Several commenters stated the following: Active management by private landowners would be more beneficial than critical habitat designations because private landowners can carry out conservation actions that might otherwise not happen. The proposal fails to properly consider the importance of cooperation and goodwill between the Service and private landowners, and the impact critical habitat designations will have in discouraging voluntary partnerships on private lands.

*Our Response:* Chapter VI, section 4.j. of the DEA discusses the potential for reduced cooperation on conservation projects as a result of critical habitat. The DEA determines that a modest but undetermined reduction in cooperation may occur, along with a corresponding but undetermined environmental loss to society.

#### *Summary of Changes From the Revised Proposed Rule*

Based on a review of public comments received on the proposed determinations of critical habitat, we have reevaluated our proposed designations and included several changes to the final designations of critical habitat. These changes include the following:

(1) The scientific names changed for the following associated species with the listed species found in the “Supplementary Information: Discussion of the Plant Taxa” section: *Lipochaeta integrifolia* changed to *Melanthera integrifolia* for *Centaurium sebaeoides*; *L. subcordata* changed to *Melanthera subcordata* for *Lipochaeta fauriei*; *Styphelia tameiameia* changed to *Leptocophylla tameiameia* for *Chamaesyce halemanui*, *Delissea rhytidosperra*, *Diellia erecta*, *Diellia pallida*, *Exocarpos luteolus*, *Mariscus pennatifolius*, *Melicope knudsenii*, *Platanthera holochila*, *Poa siphonoglossa*, *Pteralyxia kauaiensis*, *Schiedea kauaiensis*, *Schiedea stellarioides*, *Viola kauaiensis* var. *wahiawaensis*, and *Xylosma*

*hawaiiense*; *Hibiscus tiliaceus* changed to *Talipariti tiliaceus* for *Cyperus trachysanthos*; *Myrica faya* changed to *Morella faya* for *Diellia erecta* and *Exocarpos luteolus*; *Stachytarpheta dichotoma* changed to *S. australis* for *Brighamia insignis*, *Cyanea undulata*, *Dubautia pauciflora*, *Lipochaeta micrantha*, and *Viola helenae*; *Mariscus meyenianus* changed to *Cyperus meyenianus* for *Diellia erecta* and *Poa mannii*; *Mariscus phleoides* changed to *Cyperus phleoides* for *Centaurium sebaeoides*; *Pluchea symphytifolia* changed to *P. carolinensis* for *Cyanea undulata*, *Dubautia pauciflora*, *Hedyotis st.-johnii*, and *Lipochaeta micrantha*; *Athyrium sandwichianum* changed to *Diplazium sandwichianum* for *Plantago princeps*, *Melicope knudsenii*, *Flueggea neowawraea*, *Euphorbia haelealeana*, *Xylosma crenatum*, *Viola helenae*, *Schiedea membranacea*, *Pteralyxia kauaiensis*, *Phyllostegia wawrana*, *Phyllostegia waimeae*, *Nothocestrum peltatum*, *Dubautia latifolia*, *Delissea rivularis*, *Cyrtandra limahuliensis*, *Cyrtandra cyaneoides*, *Cyanea undulata*, *Cyanea remyi*, and *Alsinidendron lychnoides*; and *Setaria gracilis* changed to *Setaria parviflora* for *Brighamia insignis*, *Cyanea undulata*, and *Dubautia pauciflora*.

(2) We corrected the misidentification of *Passiflora mollissima* to *P. tarminiana* which is an associated species found with the following listed species: *Delissea rhytidosperra*, *Dubautia latifolia*, *Nothocestrum peltatum*, *Phyllostegia wawrana*, *Poa sandwicensis*, *Schiedea membranacea*, *Delissea undulata*, *Diellia erecta*, and *Solanum sandwicense* in the threat section of the species descriptions in the “Supplementary Information: Discussion of the Plant Taxa”.

(3) We changed “spp.” to the specific species which are associated with the following listed species found on Kauai in the “Supplementary Information: Discussion of the Plant Taxa” and section 17.99: *Touchardia* spp. changed to *Touchardia latifolia* for *Cyanea remyi*; *Syzygium* spp. changed to *Syzygium sandwicensis* for *Isodendron longifolium*; *Gunnera* spp. changed to *Gunnera kauaiensis* for *Cyrtandra cyaneoides*, *Plantago princeps*, and *Phyllostegia waimeae*; *Eugenia* spp. changed to *Eugenia reinwardtiana* for *Cyrtandra limahuliensis* and *Isodendron longifolium*; *Pteralyxia* spp. changed to *Pteralyxia kauaiensis* for *Alectryon macrococcus*, *Delissea rhytidosperra*, and *Euphorbia haelealeana*; *Alectryon* spp. changed to *Alectryon macrococcus* for *Phyllostegia wawrana*; *Broussaisia* spp. changed to