[Federal] Endangered Species Act shall be deemed to be an endangered species under the provisions of this chapter * * *'' (Hawaii Revised Statutes (HRS), sect. 195D–4(a)). The State law prohibits taking a listed species on private and State lands and encourages conservation by State government agencies. In addition, State regulations specifically prohibit the removal, destruction, or damage of plants found on State lands. However, the regulations are difficult to enforce because of limited personnel.

Seven of the proposed taxa have one or more populations in NARs, which have rules and regulations for the protection of resources (HRS, sect. 195-5). Almost all populations of the 25 proposed taxa are located on land classified within conservation districts and owned by the State of Hawaii or private companies or individuals. Regardless of the owner, lands in these districts, among other purposes, are regarded as necessary for the protection of endemic biological resources and the maintenance or enhancement of the conservation of natural resources. Activities permitted in conservation districts must not be detrimental to a multiple use conservation concept and shall conserve threatened or endangered plants (HRS, sect. 205-2). Some uses, such as maintaining animals for hunting, are based on policy decisions, while others, such as preservation of endangered species, are mandated by both Federal and State laws. Requests for amendments to district boundaries or variances within existing classifications can be made by government agencies and private landowners (HRS, sect. 205-4). Before decisions about these requests are made, the impact of the proposed reclassification on "preservation or maintenance of important natural systems or habitat'' (HRS, sects. 205-4, 205-17) as well as the maintenance of natural resources is required to be taken into account (HRS, sects. 205-2, 205-4). Before any proposed land use that will occur on State land, is funded in part or whole by county or State funds, or will occur within land classified as conservation district, an environmental assessment is required to determine whether or not the environment will be significantly affected (HRS, chapt. 343). If it is found that an action will have a significant effect, preparation of a full Environmental Impact Statement is required. Hawaii environmental policy, and thus approval of land use, is required by law to safeguard "* * * the State's unique natural environmental characteristics * * *'' (HRS, sect. 344-3(1)) and includes guidelines to "protect endangered species of individual plants and animals * * *'' (HRS, sect. 344– 4(3)(A)). Federal listing, because it automatically invokes State listing, would also implement these other State regulations protecting the plants.

State laws relating to the conservation of biological resources allow for the acquisition of land as well as the development and implementation of programs concerning the conservation of biological resources (HRS, sect. 195D-5(a)). The State also may enter into agreements with Federal agencies to administer and manage any area required for the conservation, management, enhancement, or protection of endangered species (HRS, sect. 195D–5(c)). If listing were to occur, funds for these activities could be made available under section 6 of the Act (State Cooperative Agreements). The Hawaii Department of Land and Natural Resources is mandated to initiate changes in conservation district boundaries to include "the habitat of rare native species of flora and fauna within the conservation district" (HRS, sect. 195D-5.1).

Twenty-one of the proposed taxa are threatened by four plants considered by the State of Hawaii to be noxious weeds—*Ageratina adenophora* (Maui pamakani), *Ageratina riparia* (Hamakua pamakani), *Clidemia hirta* (Koster's curse), and *Myrica faya* (firetree). The State has provisions and funding available for eradication and control of noxious weeds on State and private land in conservation districts and other areas (HRS, chapt. 152; Hawaii Department of Agriculture (DOA) 1981).

Listing of these 25 plant taxa would reinforce and supplement the protection available under the State Act and other laws. The Federal Act would offer additional protection to these 25 taxa because, if they were to be listed as endangered or threatened, it would be a violation of the Act for any person to remove, cut, dig up, damage, or destroy any such plant in an area not under Federal jurisdiction in knowing violation of State law or regulation or in the course of any violation of a State criminal trespass law.

E. Other natural or manmade factors affecting its continued existence. All of the 25 taxa being proposed for listing are threatened by competition with 1 or more alien plant species (see Table 1). The most significant of these appear to be Clidemia hirta (Koster's curse), Psidium cattleianum (strawberry guava), Schinus terebinthifolius (Christmas berry), Ageratina adenophora (Maui pamakani), Ageratina riparia (Hamakua pamakani), Passiflora suberosa (huehue haole), Rubus argutus (prickly Florida blackberry), *Lantana camara* (lantana), and *Grevillea robusta* (silk oak).

Koster's curse, a noxious shrub native to tropical America, is found in mesic to wet forests on at least six islands in Hawaii (Almeda 1990, DOA 1981, Smith 1992). Koster's curse was first reported on Oahu in 1941 and had spread through much of the Koolau Mountains by the early 1960's. Koster's curse spread to the Waianae Mountains around 1970 and is now widespread throughout the southern half of that mountain range. This noxious pest forms a dense understory, shading out other plants and hindering plant regeneration, and is considered the major alien plant threat in the Koolau Mountains (Cuddihy and Stone 1990). At present, Koster's curse threatens populations of 18 of the proposed taxa— Chamaesyce rockii, Cyanea acuminata, Cyanea humboldtiana, Cyanea koolauensis, Cyanea longiflora, Cyanea st.-johnii, Cyrtandra dentata, Cyrtandra subumbellata, Cyrtandra viridiflora, Delissea subcordata, Gardenia mannii, Labordia cyrtandrae, Lobelia gaudichaudii ssp. koolauensis, Myrsine juddii, Phyllostegia hirsuta, Phyllostegia kaalaensis, Trematolobelia singularis, and Viola oahuensis (HHP 1994d1 to 1994d5, 1994d7, 1994d8, 1994d11, 1994e1 to 1994e4, 1994e7, 1994e8, 1994e10 to 1994e12, 1994e20, 1994f1, 1994f2, 1994g1 to 1994g4, 1994g22, 1994h12 to 1994h14, 1994i7, 1994i9, 1994i10, 1994j6, 1994k6, 1994L4 to 1994L6, 1994m1, 1994o1, 1994o13, 1994014, 1994035, 1994038 to 1994040, 1994042 to 1994044, 1994046, 1994p14, 1994s1, 1994u2, 1994u3, 1994v19, 1994v27, 1994v29, 1994v30, 1994w3, 1994cc2, 1994cc4, 1994dd9, 1994dd12, 1994dd13; Takeuchi & Shimabukuro (s.n.) 1987; Takeuchi (2410) 1985).

Strawberry guava, a tree native to tropical America, has become widely naturalized on all of the main islands, forming dense stands that exclude other plant species in disturbed areas (Cuddiny and Stone 1990). Strawberry guava grows primarily in mesic and wet habitats and is dispersed mainly by feral pigs and fruit-eating birds (Smith 1985, Wagner *et al.* 1990). Strawberry guava is considered to be one of the greatest alien plant threats to Hawaiian rain forests and threatens populations of 15 of the proposed taxa-Chamaesyce herbstii, Chamaesyce rockii, Cyanea koolauensis, Cyanea longiflora, Cyrtandra dentata, Cyrtandra viridiflora, Delissea subcordata, Eragrostis fosbergii, Gardenia mannii, Labordia cyrtandrae, Lepidium arbuscula, Myrsine juddii, Phyllostegia hirsuta, Phyllostegia kaalaensis, and Viola oahuensis (HHP 1994c2, 1994c3,