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Comments: 1. What is the mechanism in place for addressing new additions to the SCC list - say a new species is found / a new population of a hitherto unknown sensitive plant on the planning unit(s) - e.g. *Eriocoma richardsonii* was just recently found in 2020. I see no mention of this.

2. It is clear that there has been very little follow-up revisiting of rare plant populations for the large majority of species addressed in the SCC document - the large majority have a status of "Insufficient scientific information to determine that populations of this species are declining". This speaks strongly to the long-recognized fact that the USFS does not take its legally-mandated role to protect rare plant resources very seriously. This has been the case for decades and virtually nothing has been done to address the issue - this neglect has become more entrenched with each passing year. There is even a statement in the Volume 2 document under *Neottia boreale* that says: "It is a tiny species that requires flowers to accurately identify. Other species of *Neottia* grow in the same habitat. Forest Service priorities make it difficult to return to check a potential population a second time to find it in bloom. It is possible that additional populations have been overlooked for these reasons". That says it all right there - the USFS writ large has little interest in fulfilling its legally-mandated duty to steward biodiversity preservation. FS staff really can't return to a site to see if a species is in bloom in the out years? That is patently ridiculous!

3. Apropos of comment 2 above I believe it is critically important to put firm language in the plan that ALL G1 and G2 species be required to have active monitoring plans in place on a regular basis with a strong monitoring plan that is reviewed by experts in plant monitoring protocols (usually contractors outside the agency) that minimize non-sampling error and have the power to detect statistically significant change.

4. Why does *Castilleja viscidula* have a seed accession at the Berry Seed Bank when it has a NatureServe rank of G4G5 and *Castilleja fraterna* and *Castilleja rubida*, both NatureServe G1 taxa, are not even properly mapped and have none at all? Clearly terrible out-of-sight, out-of-mind management decisions with exceedingly rare plants!! No wonder the agency loses in court every time environmental organizations call the Service on the carpet for blatantly willful negligence. This sort of dereliction of duty is NOT the fault of the boots-on-the-ground botanical staff who truly do care and suffer through the decisions that come from upstream in the org-chart - it is a willful political decision made by that upstream staff. USFS - biodiversity matters whether you believe it or not!

5. Regarding the use of the phrase: "population trend information is limited for this species" which appears in the text of both volumes dozens of times at least, I feel that there should be more honest language rather than this choice of words. Everywhere that phrase appears it needs to be replaced with "population trend information is not known" or "population trend information has never been investigated/addressed".

6. So the district ranger on the Pomeroy R.D. in Washington made the command decision that *Ribes wolfii* was NOT to be protected during a logging project? The species is sensitive in Washington, so he did not have the authority to make that call - this was an illegal action!