

Data Submitted (UTC 11): 3/3/2022 11:54:31 PM

First name: Margaret

Last name: Willits

Organization:

Title:

Comments: This initial objection is based on new information. I would have like to have provided this information during the comment opportunity, but the CNPS website for the Rare Plants Inventory was under a major change and was not available. With the new website, I was easily able to obtain this information now. In addition, the Botany Report was not available during the comment period and so I did not know what it would cover until the FEIS.

As the Botany Report states:

Management of Forest Watchlist and Botanical Interest Species is supported by the diversity clause of NFMA, the diversity and viability portions of the Forest Plan and Departmental Regulation 9500-4. NFMA requires the Forest Service to "provide for diversity of plant and animal communities based on the suitability and capability of the specific land area in order to meet overall multiple-use objectives"

[16 U.S.C. 1604(g)(3)(B)]. Departmental Regulation 9500-4 directs the Forest Service to "manage habitats for all existing native and desired nonnative plants, fish, and wildlife species in order to maintain at least viable populations of such species" and "avoid actions which may cause a species to become threatened or endangered" (FSM 2670.12).

My concern is a species Gowen's navarretia (*Navarretia miwukensis*), which is G1G2, S1S2, CNPS 1B.2. It is known from 7 historical records and 5 more recent records of with 11 are presumed extant. All occur in a very limited area that are partially within the project area and partially to the north of the project area. The area between these known locations includes the project area.

It would be a viability concern to implement this large project in areas of suitable habitat without ensuring surveys for and protection of this species. It would be on the Sensitive Plant or Species of Concern list if those had been revised more recently. Its location on volcanic ridges and openings means it could be affected by fuelbreaks and other actions proposed in the SERAL project.

The remedy I suggest are to include the analysis for this species in the Botany Report. My understand it that since it is not a sensitive species, it cannot be addressed in the Biological Evaluation. I suggest a management requirement to survey for and protect this species, essentially treating it as a sensitive plant would be treated, since it is currently known as quite rare.

This species is mainly known from collections near major roads and highways. There may be much more than is currently known. I suggest that if enough populations are found to indicate that it is more abundant than current indications and that there are as many populations outside the project, or if it is found to occur on habitat that is already protected for other reasons, the survey requirement may be dropped with a letter documenting the findings to the file.