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Comments: This second objection is based on new information. I just found out about this species today.

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 that this species is only known from four occurrences in Tuolumne county. It is at an elevation which is included in the SERAL projects and its known locations indicate that it can be in the project. There is a contradiction in the information in the CNPS Flora magazine and on their website in terms of numbers of occurrences and whether it is 1B.1 or 1B.2. One of the occurrences is from inaturalist. Again there may be more than is currently known.

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

The remedy I suggest are to include the analysis for this species in the Botany Report. My understanding is 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.