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Comments: Castle Creek fire restoration project

Maps of the "project area" are woefully inadequate. All landmarks, elevation lines and geographic features are obscured by heavy shading. Maps are too small and cannot be zoomed or enlarged. I was not able to check many of my personal observations on the map provided. Nor able to verify if previous documented occurrences occur in the burn or the "project area".

It is evident that Slate Mountain Botanical Area is not included in the project area. Is that correct? Many Slate Mtn plants are rare and should not be in "project area".

Jordan Peak is home to several rare plants. It is not clear if that is included in the "project area". Species include Fawn Lily, Mineral King Draba, and others. I am not convinced that treating that area with logging, brush removal or herbicide is beneficial while potential for harm to rare plants is high. In fact the area is quite small.

Not finding a rare plant in the 2021 survey is not sufficient reason to exclude it from consideration. It does not take into consideration what may be in the seed bank or in locations with appropriate habitat that have not been surveyed in 2021. A one summer survey cannot accurately identify all locations. Historical accounts cannot be dismissed after only one survey

After researching CNDDDB and Calflora I agree that these species on Page 36 are not found in the "project area " or the burn due to wrong elevation or habitat.

*Ivesia campestris*, States there are populations in the area but they are not in calflora or cnddb

*Calyptridium pygmaeum*. Perhaps FS has locations not in cnddb

*Delphinium purpusii*. Lower elevations of Kern Canyon

*Dicentra nevadensis*. Higher elevations to the north

Most of the plants listed as NFA are also appropriate. I cannot address mosses.

I have questions about these.

*Cinna bolanderi*: 1B.2 Recorded from Freeman Creek Grove only. This is in the project area. No reason to assume it is extirpated after only one survey in 2021. Photos of thriving populations in the burn after Creek fire, Fresno Co. are posted on Calflora

Needles Buckwheat *Eriogonum* is stated as *Eriogonum breedloveii* var *shevockii* which is a 4.3 on the CNPS rank. *E. breedloveii* is stated as not found in the project area in 2021. Since it clearly is in the burn footprint, that is not explained. Was the Needles outcrop preserved from burn? Is the Needles excluded from the "project area"? Was it completely burned and no *E. breedloveii shevockii* found? Were the high nooks and crannies too high to survey? Which plant was surveyed? Both *Eriogonum twisselmannii* a rank 1b.2 and *Eriogonum breedloveii* were on Needles. Explanation needed. Maps do not adequately indicate what is in the project area.

Hall's daisy, *Erigeron aequifolius* 1B.3 occurs at the base of the Needles and is restricted to rocky outcroppings. Questions are the same as Needles Buckwheat. If Needles is excluded from the "project area", then how far away would the project be?

Greenhorn Fritillary: 1B.3 Multiple locations for this rare plant cannot be evaluated from the project map. As an example, a population near Coy Flat campground was buried and destroyed by regrading of the road for the Black Mountain burn. Pier fire 2016 I believe. After 6 years only 1 plant can be found in that area as opposed to

about 10 plants previously. These plants do need protection and are destroyed with treatments. I cannot ascertain if they are in the project area from the provided map.

*Lewisia disepala*: Occurs on rocky outcrops. Same questions as Needles Buckwheat. Are these outcrops automatically excluded from "project area"? Were all of them surveyed?

*Boechera shevockii*: Only one occurrence in CNDDDB on Needles. Excluded as NFA when Needles is the only location for it. Again no explanation how it was missed in the survey.

*Hulsea breviflora*: one occurrence in the 1980's along 31E14 which seems to have been overgrown by a pine plantation based on the description given by Jim Shevock- North of North Click's Creek. Was that included in 2021 surveys? It should be surveyed specifically. It was discarded from the list as NFA but that plant thrives in post-burn situations. Populations increased dramatically in at least one area in the Rough Fire footprint in Sequoia National Forest.

No access has been given to the public to many of these locations for safety reasons but again, one summer survey is not adequate to establish that so many historic occurrences are extirpated.