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Comments: Hello,

As a botanist, I have significant concerns that the DEIS Appendix C's Draft Biological Evaluation Covering All Region 5 and Region 6 Regional Foresters' Sensitive Species's list of plant species is incomplete and inaccurate for Regions 5 and 6.

A cursory review of herbarium records and of Region 5 and Region 6's own RFSS lists reveals that many plant species on these RFSS lists have been omitted or had their ranges underestimated. I understand that the preparers of this list have demurred on offering impact determinations for individual plant species in favor of evaluating impacts on a project-by-project basis. However, I worry that the incomplete and inaccurate list presented in Appendix C will be used in the future as a baseline for evaluating which species need to be accounted for when projects are being planned.

Here are several examples of plant species who were omitted or had their ranges underestimated despite the availability of recent herbarium accessions documenting their presence on National Forest land:

Actaea laciniata is listed in Appendix C as only occurring in Gifford Pinchot National Forest. However, a review of herbarium data available via the Consortium of Pacific Northwest Herbaria (CPNWH) shows the species commonly known as Mt. Hood Bug Bane is also known to occur in Mt. Hood National Forest as well and has been collected there as recently as 2019.

Agrostis howellii is an RFSS with several occurrences in the Columbia River Gorge National Scenic Area, but it is omitted from Appendix C entirely. These occurrences are visible on OregonFlora.org via the Oregon State University Herbarium.

Allium campanulatum is listed in Appendix C as only occurring in the Okanogan-Wenatchee National Forest. Herbarium records available via OregonFlora.org show it has documented occurrences in multiple National Forests in Oregon as well.

Bolandra oregana is known to occur in the CRGNSA, not just Gifford Pinchot National Forest. These populations are documented with accessions available from CPNWH and OregonFlora.

Calypogeia sphagnicola has at least one documented population in the Rogue River-Siskiyou National Forest but is omitted entirely from the Appendix C list. This accession is available via OregonFlora.

Campanula lasiocarpa has documented populations in the Mt. Baker-Snoqualmie National Forest but is omitted entirely from the Appendix C list. These accessions are available via CPNWH.

This is just a small sampling of the omissions and errors made in Appendix C's RFSS list of plants. Plant surveys are underfunded and overlooked, and many offices and agencies depend on previous work and old lists, like the list in Appendix C, to determine the likelihood that a species may occur in a project area. I fear that if the list in Appendix C is incomplete, its omissions will cause species that are known to occur in certain areas to be forgotten when it comes time to evaluate the impact of individual projects to RFSSes. The RFSS list for plans in Appendix C should be comprehensively checked and revised against readily available herbarium information, USFS internal records, and citizen science data like that available via iNaturalist, for omissions and inaccuracies.

Thank you,
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