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Comments: This series of comments on the PLAN supercedes my previous comments by providing more updated language that specifically ASK for particular additions to the text of the PLAN and, additionally, provides what the EFFECTS of these additions will be.

1.I am SPECIFICALLY asking that the PLAN include clear language that elucidates exactly how new additions to the SCC list can be accommodated - say a new species is found / a new population of a hitherto unknown sensitive plant on the planning unit(s). This has the EFFECT of providing clear legal language for how new taxa may be addressed at a later date. It can be certain to happen that new taxa will need to be considered, and this procedure needs to be clearly spelled-out as to what the mechanism is.

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 has not been able to protect rare plant resources through proactive approaches and careful monitoring. This has been the case for decades and essentially 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 is a very telling statement - the USFS writ large has little interest in fulfilling its legally-mandated duty to steward biodiversity preservation. I am SPECIFICALLY asking that this issue, which is critically important to the preservation of biodiversity on the Tri-Forest lands, be addressed by emplacing CLEAR language in the PLAN that directly spells-out that ALL G1, G2 and S1, S2 taxa (vascular plants, non-vascular plants, and lichens) must have an established regularly-instituted monitoring plan in place that addresses trend and health of these taxa. I am specifically asking that these monitoring plans - ALL of them - be reviewed by outside experts in this field in order to minimize non-sampling error and maximize the power to detect statistically significant change.

3.I am SPECIFICALLY asking that the PLAN include language that clearly lays out scientifically defensible seed accession collection protocols with accessions to be sent to the Rae Selling Berry Seed Bank and/or the Miller Seed Vault for ALL G1 and G2 and S1 and S2 taxa. As a good example of why this is critical: *Castilleja viscidula* has a seed accession at the Berry Seed Bank with a NatureServe rank of G4G5 while both *Castilleja fraterna* and *Castilleja rubida*, both NatureServe G1 taxa, do not even have the EO's properly mapped and with no seed accessions - none at all. This serious oversight needs to be addressed. The EFFECT of this language inclusion is to provide for germplasm conservation that is desperately needed in order to preserve biodiversity.

4.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, I SPECIFICALLY ask that the PLAN include more truthful and accurate language as follows: Everywhere the above phrase appears it needs to be replaced with "population trend information has not been investigated/addressed or documented". The EFFECT of this language is to provide a clear admission that there is, at the present time, no data that indicates whether said taxon is declining, stable or increasing in abundance over time.

5.There is, included in the document, an admission that individual District Rangers have made override command decisions that supercede preservation of biodiversity. As an example it is clear that the district ranger on the Umatilla Pomeroy R.D. in Washington made the command decision that *Ribes wolfii* was NOT to be

protected during a logging project - this is stated in the write-up for that species ["This site was already slated for logging before the fire. Protections for the population were not approved by the District Ranger"]. The species is sensitive in Washington, so he did not have the authority to make that decision. I am SPECIFICALLY asking that the PLAN include clear language that says that District Rangers DO NOT have the authority to decide which SCC species are protected from damage and which are not protected. The EFFECT of this language is to draw a clear line that specifically prevents District Rangers in the future from making decisions such as this that breach existing legally-mandated protections for rare species.

6.I am SPECIFICALLY asking that the PLAN include a requirement that ALL project surveys for SCC plants will list ALL plant species found in the survey area boundaries and that that data will then be entered into the NRM database. This was a requirement under the 1990 Umatilla planning rule (Chapter 4 - page 27). This requirement was instituted for many important reasons. The EFFECTS of instituting this language in the PLAN is that it will, over time, allow for 1: the ability to track species composition over time in a given geographic (project-defined) area. 2: the ability to evaluate the long-term effects of climate disruption and fire to plant composition over a given area. 3: the ability to track invasive weed infestation progression in a given area. 4: the ability to evaluate plant species composition over various HUC watershed classification levels. These data have been used in the past specifically for addressing issues such as subwatershed health. Not following this previously mandated protocol has the effect of blinding the natural resource managers to on-the-ground conditions over time.

7.I am SPECIFICALLY asking that ALL SCC plant surveys conducted require that a GPS track be saved, downloaded and included within a editable GIS layer that documents where SCC plant surveyors have been on the ground. I am also SPECIFICALLY asking that each survey track be buffered at 15 meters to either side of the actual on-the-ground tracks. This 15 meter buffer in general accurately reflects the line of sight distance a given SCC plant surveyor can actually legitimately assess while conducting a given walking survey. There is already an existing layer documenting all the known recorded tracks on the Umatilla N.F., but this has never been conducted on either the Malheur nor Wallowa-Whitman National Forests. The EFFECT of enacting this language in the PLAN is that it will accurately record where SCC plant surveyors have been on the ground and accurately indicate just how much ground has actually been evaluated for SCC resources - as the existing survey track data on the Umatilla N.F. clearly shows the amount of actual surveyed ground is miniscule compared to the acreage of a typical given project area.