



WARNER COLLEGE OF
Natural Resources



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Craig Hansen
Recovery Coordinator
U.S. Fish and Wildlife Service, Region 6

December 8, 2020

RE: Peer Review of Future Condition Report for Graham's beardtongue (*Penstemon grahamii*) and White River beardtongue (*P. scariosus* var. *albifluvis*)

Dear Craig,

In my peer review of the 'Future Condition Report for Graham's beardtongue (*Penstemon grahamii*) and White River beardtongue (*P. scariosus* var. *albifluvis*)' I found that the document provides an adequate assessment and analysis of future conditions for the next ten years (e.g. through 2030) for the two *Penstemon* species. I did not note any significant oversights or inconsistencies in the Future Conditions Report. The conclusions reached by the Service are logical and supported by the provided evidence, and uncertainties in the ability to evaluate some stressors was acknowledged. However, as the document states, regulatory mechanisms beyond the next 10 years may not be adequate to protect the species from on-going and future stressors. In light of the impacts to both species under each of the two future scenarios and the uncertainties related to the stressors, I recommend that the species status assessments be completed for these two species prior to the target date of 2028, and that the future conditions scenarios be reviewed again at that time. I also recommend that on-going research, monitoring and management plans as outlined in the Conservation Agreement and Strategy for Graham's Beardtongue (*Penstemon grahamii*) and White River Beardtongue (*P. scariosus* var. *albifluvis*): 2019 Annual Report be continued so that threats from energy development, incompatible livestock use, climate change and invasive plant species can be addressed. Only by ensuring the resiliency, redundancy and representation of the beardtongues on the land can these species be conserved and ultimately considered recovered.

Sincerely,

A handwritten signature in cursive script that reads "Jill Handwerk".

Jill E. Handwerk
Botany Vegetation Ecology Team Leader
Colorado Natural Heritage Program