

Carol Dawson comments:

Biological Status Report of Current Condition and Recommended Avoidance Buffer and Surface Disturbance Caps for Graham's Beardtongue and White River Beardtongue

The description and analysis of the species' needs, biology, habitat, population trends, and historic and current distribution of the species is extremely comprehensive. All of these chapters in the report cite the best available data that supports the conclusions. After reviewing the literature cited section it does not seem even possible that there are any significant omissions or oversights in the information used to prepare this Biological Status Report.

The Biological Status Report clearly states how this technical document that evaluates species biological status differs from a Species Status Assessment (SSA). This document further explains how the SSA concepts of resilience, redundancy, and representation are utilized in this report.

Within the Occurrence data section, the definitions of the three habitat types: suitable, occupied, and pollinator, are logical and precise. The sections that describe how the viability of both Graham's and White River beardtongues will be assessed using the 3Rs is perceptive. Throughout all sections of this document the analysis is comprehensive, including identifying areas where information is lacking.

The Executive Summary and Chapter 7, Summary of Recommendations to Support Viability are overwhelmingly supported by the analysis completed in this document.