



October 1, 2018

USDA Forest Service, Pacific Southwest Region
Attn: Bernie Gyant, Deputy Regional Forester (Inyo Natl. Forest Objection Reviewing Officer)
1323 Club Drive, Vallejo 94592

RE: Objection of the Inyo National Forest Draft Record of Decision, EIS, and Forest Plan for the Inyo Forest Plan Revision

Dear Bernie:

Following is a joint objection from the California Forestry Association (CFA) and American Forest Resource Council (AFRC) of the Inyo National Forest Draft Record of Decision (ROD), EIS and Forest Plan. The Responsible Official of the ROD, EIS, and Plan is Tammy Randall-Parker, Forest Supervisor, Inyo National Forest. The technical contact for the CFA/AFRC objection is Steve Brink (steveb@calforests.org; 916-208-2425).

The Objection:

This is an Objection to the Inyo National Forest Draft Record of Decision, EIS and Forest Plan for the Inyo Forest Plan Revision.

The Responsible Official is Tammy Randall-Parker, Forest Supervisor, Inyo National Forest

Statement of the Issues/Parts of the draft ROD, EIS, and Forest Plan to which this Objection applies:

1. Determination of suitable acres for timber production
2. The ROD does not make part of the Decision that “the projected timber sale quantity is neither a target nor a limitation on harvest” (Plan, Appendix D, p. 158) and the ROD does not mention the anticipated 1st and 2nd decade acres of thinning and regeneration other than say the selected Alternative is B-Modified (ROD, p. 7).
3. Alternative B-Modified is different than what is called for in the Plan and/or in the ROD.

4. The ROD is silent on incorporating the 30" diameter limit with stated exceptions in the Forest Plan
5. At-Risk Species and Species of Conservation Concern
6. Likely inability of the Forest to be able to be responsive to the workload established by the Monitoring Plan (Plan, Chapter 4).

Statement explaining the objection and suggesting how the proposed plan decision may be improved.

1. Suitable acres – there's 3 different numbers. (1) The existing plan shows 85,025 acres, the no action alternative A (existing plan) shows (2) 84,795 acres. This is not a big surprise as you would expect a little bit of "wiggle" from a 1988 Plan calculation. But the selected Alternative B-Modified says 72,234 suitable acres. This is understandable because it subtracts out 11 suitable acres total that are in the 4 Recommended Wilderness Areas, 4,399 acres suitable in the "eligible Wild River segments", and 8,382 suitable acres in the Riparian Conservation Areas. So, if you subtract out $11+4,399+8,382$ acres you get 72,234 acres (Plan, Appendix D, p. 157). The Draft ROD, surprisingly (p. 7) says the decision is 84,795 suitable acres!

So, there is a discrepancy between the Plan and the draft ROD. Clearly the 11 acres in recommended wilderness and 4,399 acres in Wild River segments must come out of the 84,795 acres (=80,385 acres). Vegetation management is needed to "maintain" the Riparian Conservation Areas; no management equals wildfire, insect and disease, which does not maintain the Riparian Conservation Area. Therefore, we believe the suitable lands in the Riparian Conservation Areas must remain in the suitable land base.

Recommended resolution: The suitable acres in the ROD should be 80,385 acres.

2. Predicted acres of vegetation manipulation 1st and 2nd decade
 - The Plan Appendix D p. 159 shows for 1st and 2nd decade a planned timber sale program of 7-9 million cubic feet (MMCF) or about 3.5-4.5 mmbf/year. "The projected timber sale quantity is neither a target nor a limitation on harvest" (Plan, Appendix D, p. 158)".
 - The Plan Appendix D p. 160 estimates 8,000-11,500 acres of thinning per decade and 1,000-2,000 acres of regeneration per decade or about 800-1,150 acres of thinning per year and 100-200 acres of regeneration per year.
 - The ROD (p.17) recognizes from Plan Appendix D the sustained yield limit of 40 million cubic feet (MMCF) per decade and the estimated timber sale quantity of 7-9 MMCF/decade. However, the ROD does not make part of the Decision that "the projected timber sale quantity is neither a target nor a limitation on harvest" and

the ROD does not mention the anticipated 1st and 2nd decade acres of thinning and regeneration other than to say the selected Alternative is B-Modified (ROD, p. 7).

- Alt. B-Modified provides for up to 50% increase in acres of accomplishment over existing plan. The existing Plan (p. 57 Forest wide Timber Objective) says provide 20-30 mmbf/decade (or 2-3 mmbf/year). The Plan Timber Objective (p. 57) should be changed to match Appendix D with an estimated sale quantity of 7-9 MMCF/decade.

Recommended Resolution: The estimated timber sale quantity and the anticipated decadal acres for thinning and regeneration should be mentioned in the ROD. The ROD should also clarify that the projected timber sale quantity is not a limitation on harvest.

- No mention of the existing forest condition and the need for reforestation
3. Alternative B-Modified calls for a projected wood supply of 7-11 million cubic feet (mmcf)/decade (EIS, Appendix A, p.6). The Plan, Appendix D, p. 159 calls for a projected wood supply of 7-9 mmcf/decade. B-Modified also calls for Group Selection to be used to regenerate suitable lands, increasing vertical structure, heterogeneity and tree species diversity (EIS, Appendix A, p. 6). Neither the Plan nor the ROD mention the ability to use Group Selection.

Recommended Resolution: The ROD, Plan, and EIS need to be consistent. The ROD and Plan need to recognize Group Selection as a legitimate method for regeneration, vertical structure, heterogeneity, and tree species diversity.

4. A 30"+ diameter (dbh) limit with exceptions is included in the Plan (p. 16). However, the exceptions should be expanded to address:
- a. the desired conditions and objectives (Plan, pp. 14-15) that call for:
 - vegetation structural diversity to keep insect and disease populations at endemic levels;
 - a mosaic of vegetation types and structures that provide for habitat movement and connectivity; and
 - composition, density, structure and condition of vegetation that helps reduce the threat of undesirable wildfires;
 - b. potential management approaches (Plan, pp. 16-17) that provide for "early seral habitat";
 - c. Plan (p. 18, Table 1) providing 5-20% early seral in all vegetation types except 10-20% in dry mixed conifer

Recommended Resolution: The Plan (p.16) Standard (TERR-FW-STD) should add an exception for the 30” diameter limit to provide for the desired condition of 5-20% of the vegetative types (except dry mixed conifer 10-20%) for early seral (Plan, Table 1, p.18).

The ROD should bring forward the Plan Standard (p. 16) on the 30” diameter limit with exceptions.

5. At-Risk Species and Species of Conservation Concern

a.) At-Risk Species

The Plan states it includes Plan Components for At-Risk Species (Threatened, Endangered, and Candidate Species under the Endangered Species Act) but does not list what the Species are.

Recommend: A Table of At-Risk Species should be included in the ROD and be explicit if there are any Candidate Species. For Candidate Species, the Plan should clarify what the effect will be if the Candidate is not ultimately listed.

b.) List of the Species of Conservation Concern

The Plan (p.34), in a footnote, points the reader to a website <http://www.fs.usda.gov/main/r5/landmanagement/planning> for the Inyo’s list of species of conservation concern. It seems odd that the reader and the Plan administration staff must go to a website and several menus within the website to find the list. It also creates concern about potential changes to the website or service outages. The list should be included in the Plan document (attachment #1). The Plan also provides Plan Components addressing the needs of “At-Risk Species” (Threatened, Endangered and Candidate Species under the Endangered Species Act.) But the Plan does not provide a list of the Threatened, Endangered, and Candidate species.

Recommend: A table with a list of the Species of Conservation Concern be added to the ROD.

c.) The methodology of how Plan components and other parts of the Plan provide assurance of conservation for the Species of Conservation Concern

A pathway to assure a viable population of each Species of Conservation Concern (Section 219.9 of the 2012 Planning Rule (36 CFR 219.9)) requires that the Plan must include Plan components, including standards and guidelines, to provide the ecological conditions necessary to “maintain a viable population of **EACH** **[emphasis added]** species of conservation concern within the plan area.”

We are unable to find in the EIS and the Plan (Components, standards and guidelines, . . .) inclusion of information that describes how the ecological conditions

for “EACH” species of conservation concern will be provided to assure maintenance of a viable population.

To the extent the 2012 Planning Rule prioritizes species of conservation concern without consideration of multiple-use objectives, it violates NFMA. NFMA requires forest plans to “provide for diversity of plant and animal communities based on the suitability and capability of the specific land area *in order to meet overall multiple-use objectives ...*”, 16 U.S.C. §1604 (g)(3)(B) (emphasis added). Thus, the Plan also violates NFMA if it fails to adequately consider multiple-use objectives as part of its components for species of conservation concern.

Recommended resolution: Discussion section added to the ROD to describe how the Plan Components and Standards and Guidelines are structured to provide the ecological conditions necessary for “EACH” species of conservation concern to assure maintenance of a viable population. Ensure that these components adequately allow for accomplishment of multiple-use objectives.

d.) California Spotted Owl

The Plan’s approach to managing the CA Spotted Owl (Plan, pp. 41-45) does not appear to incorporate the Sept. 2017 Malcolm North et al research findings https://www.fs.fed.us/psw/publications/north/psw_2017_north004.pdf). The Plan strategy focuses on managing 300 acre protected activity centers (PACs), while the North research points to tree height, dense canopy high up in the tall trees, no ladder fuels under the nest, nest area less than 10 acres . . . It’s unclear why or how the Region/Forests continue to manage in terms of 300-acre PACs in light of the best available science (Sept. 2017. North et al.).

Recommend: Preferred nesting habitat structure and foraging habitat structure is now known with the Sept. 2017 research findings and should be the management direction in this Plan.

6. Likely inability of the Inyo National Forest to meet the requirements in the Monitoring Plan (Forest Plan, Chapter 4).

Many of the Monitoring Questions in the Plan Monitoring Program (Plan, Chapter 4) are either vague (thus difficult or not able to measure), require a resource-intensive quantitative statistically-valid plot inventory to measure and analyze, or do not identify monitoring methods to answer the questions.

Monitoring Item	Vague (not measurable)	Quantitative statistically-valid plot data & analysis	Unknown Monitoring Method(s)
WS01	x		

WS02		x	
TE01		x	
TE03		x	
AE01		x	
AE02		x	
AE03		x	
FS01		x	
FS02		x	
AR01		x	
AR02		x	
AR03		x	
VU01		x	
VU02		Use needs to be measured	
VU04		Needs to be Quantitative	x
CC01		x	
CC02 (Is this a USFS function?)		x	
CC03			
PC01			x
PC02			x
PR01		x	

There are no monitoring items that directly address whether-or-not the Plan is responsive to recovering the 7 At-Risk T&E species, and whether-or-not the Species of Conservation Concern have viable populations that are well-distributed.

The Monitoring Plan, p. 112 points out that the monitoring program “must be within the financial and technical capability of the Inyo National Forest and partners. Seventeen of the twenty-five monitoring questions need statistically-valid sampling to be able to analyze whether a supportable response can be made to the question. It’s highly unlikely the Inyo National Forest and partners can realistically follow through on the 17 Monitoring Questions that need statistically-valid quantitative information.

Recommended resolution: Reassess the Monitoring Questions and Indicators to be responsive to reduce the significance of the quantitative data gathering needed. Make monitoring optional where possible.

A statement demonstrating the link between prior substantive formal comments submitted and the current objection

Most of the objection issues presented are pointing out inconsistencies between the EIS, Plan, Appendices, and the draft ROD. Our recommendations are made to provide clarity for implementation.

Both the California Forestry Association and the American Forest Resource Council made substantive comments about the 30” diameter limit. We believe the listing of the “exceptions” in the Plan is a major step forward. We believe there should be one more exception for early seral forest. We also believe it would be worthwhile to bring the 30” diameter limit with exceptions forward into the ROD.

Our objection comments to the Plan Monitoring Program are merely to point out that it is likely not implementable. Seventeen of the twenty-five monitoring questions to have supportable responses would need statistically-valid data gathering. Indicators and the necessary measurement need to be considered carefully for each monitoring item to assure they are implementable.

Finally, our objection comments to the management of Species of Conservation Concern are to suggest that the ROD needs a section added to elaborate on how the Plan Components and other parts of the Plan demonstrate a pathway to assure conservation of the Species of Conservation Concern.

Thank you for this opportunity to express concerns and recommendations on how to strengthen the Inyo National Forest Plan Revision. Steve Brink is our assigned staff person for CFA and AFRC to provide any technical details regarding this Objection.



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Enclosures:

1) Aug. 2018, Regional Forester’s List of Species of Conservation Concern for the Inyo Natl. Forest

Enclosure #1 – Inyo National Forest List of Species of Conservation Concern

Pacific Southwest Region

Regional Office,
RS 1323 Club
Drive
Vallejo, CA 94592
(707) 562-8737
TDD: (707) 562-9240

File Code: 1920
Route To:

Date: AUG 01, 2018

Subject: Species of Conservation Concern

To: Forest Supervisor, Inyo National Forest

In coordination with the Inyo National Forest, and pursuant to my responsibilities and authority under the 2012 Planning Rule (36 CFR 219.7(c)(3)), I have determined that the species identified in the enclosed list meet the criteria for species of conservation concern (SCC) on the Inyo National Forest. The definition of SCC is found at 36 CFR 219.9(c), and criteria for identifying them are outlined in the Forest Service Handbook FSH 1909.12 Chapter 10, Section 12.52c.

The SCC list for the Inyo National Forest was developed in coordination with Regional Office staff and the interdisciplinary planning team from the Forest. My staff and I carefully reviewed the rationale and documentation for potential SCC and evaluated best available scientific information to determine if a species met SCC criteria. I also considered agency and public input on potential SCC. The evaluation criteria used, the species that we considered during our evaluation, and our updated rationale for including or excluding them in the SCC list are available on the Pacific

Southwest Region webpage at:

<https://www.fs.usda.gov/detail/r5/landmanagement/planning/?cid=STELPRD3847418>.

Please note that the identification of species of conservation concern is a dynamic process. New scientific information may prompt changes in the SCC list over time. My staff will continue to work with you and your staff to evaluate new information and determine if adding or removing species from the list for the plan area is warranted.

Your revised plan provides direction to maintain and restore the ecological conditions necessary to support long-term persistence of each species of conservation concern within the plan area. Once the revised plan is in effect, the Regional Forester's Sensitive Species list no longer applies to the Inyo National Forest.

I appreciate the expertise and assistance of your staff during this process. I look forward to continuing to work together, along with our stakeholders, to ensure the diversity of species on the Inyo National Forest.

Regional Forester Pacific Southwest Region

Enclosure

cc: Mary Beth Hennessy, Alan Olson, John Exline

Inyo National Forest Species of Conservation Concern, August 2018

Species of conservation concern for the Inyo National Forest by species type, common name and scientific name

Species Type	Common Name and Scientific Name
Mammals	Pacific fisher (<i>Pekania pennant</i> ,)
	Nelson Desert Bighorn Sheep (<i>Ovis canadensis nelson</i> ,)
	Sierra Marten (<i>Martes caurina sierra</i>)
	Bald eagle (<i>Haliaeetus /eucocephalus</i>)
	Bi-State greater sage-grouse (<i>Centrocercus urophasianus</i>)
	California spotted owl (<i>Strix occidenta/is</i>)
Birds	Great gray owl (<i>Strix nebulosa</i>)
	Mt. Pinos sooty grouse (<i>Dendragapus fuliginosus howard</i> 1)
	Willow flycatcher (<i>Empidonax trail/ii brewst eri and E. t. adastus</i>)
	Black toad (<i>Anaxyrus exsul</i>)
Amphibians	Inyo Mountains slender salamander (<i>Batrachoseps campi</i> '
	Kern Plateau salamander (<i>Batrachoseps robustus</i>)
Fish	California golden trout (<i>Oncorhynchus mykiss aguabonita</i>)
Terrestrial Invertebrates	Sierra sulphur (<i>Golias behrii</i>)
	Square dotted blue (<i>Euphilotes battoides mazourka</i>)
	Mono Lake checkerspot (<i>Euphydryas editha monoensis</i>)
	Boisduval's blue (<i>Plebejus icarioides inyo</i>)
	San Emigdio blue (<i>Plebufina emigdio nis</i>)
	Apache fritillary (<i>Speyeria nokomis apacheana</i>)
	A cave obligate pseudoscorpion (<i>Tuberochemes aalbUI</i>)
Western pearlshell mussel (<i>Margaritifera fa/cata</i>)	
Aquatic Invertebrates	Wong's springsnail (<i>Pyrgulopsis wong</i> 1)
	Owens Valley springsnail (<i>Pyrgulopsis owensensis</i>)
	Ramshaw Meadows abronia (<i>Abronia alpina</i>) Alpine bentgrass (<i>Agrostis humi/is</i>)
	Great Basin onion (<i>Allium atrorubens</i> var. <i>atrorubens</i>)
	Inflated Cima milk-vetch (<i>Astragalus cimae</i> var. <i>sufflatus</i>)
Plants	Inyo milk-vetch (<i>Astraga/us inyoensis</i>)
	Long Valley milk-vetch (<i>Astragalus johannis-howellii</i>)
	Spiny-leaved milk-vetch (<i>Astraga/us kentrophyta</i> var. <i>elatus</i>)

Type	Common Name (Scientific name)
Plants	<p>Lemmon's milk-vetch (<i>Astragalus lemmonii</i>) Kern Plateau milk-vetch (<i>Astragalus lentiginosus</i> var. <i>kemensis</i>) Mono milk-vetch (<i>Astragalus monoensis</i>) Raven's milk-vetch (<i>Astragalus ravenii</i>) Shockley's milk-vetch (<i>Astragalus shockleyi</i>) Kern County milk-vetch (<i>Astragalus subvesmus</i>) Bodie Hills rockcress (<i>Boechea bodiensis</i> (Arabid.) Rabbit-ear rockcress (<i>Boechea pendulina</i> (Arabid.) Pinzl's rockcress (<i>Boechea pinz/iae</i>) Shockley's rockcress (<i>Boechea shockleyi</i> (Arabid.) Tiehm's rockcress (<i>Boechea uehmii</i> (Arabid.) Tulare rockcress (<i>Boechea tularensis</i>) Upswept moonwort (<i>Botrychium ascendens</i>) Scalloped moonwort (<i>Botrychium crenulatum</i>) Slender moonwort (<i>Botrychium lineare</i>) Mingan moonwort (<i>Botrychium minganense</i>) Bolander's bruchia (<i>Bruchia bolanderi</i>) Inyo County star-tulip (<i>Calochortus excavates</i>) Pygmy pussypaws (<i>Calyptidium pygmaeum</i>) Davy's sedge (<i>Carex davyi</i>) Spikerush sedge (<i>Carex duriscu/a</i>) Idaho sedge (<i>Carex idaho</i>) Liddon's sedge (<i>Carex petasata</i>) Northern meadow sedge (<i>Carex praticola</i>) Western single-spiked sedge (<i>Carex scirpoidea</i> ssp. <i>pseudoscirpoidea</i>) Steven's sedge (<i>Carex steveni</i>) Tioga Pass sedge (<i>Carex tio_gana</i>) Western valley sedge (<i>Carex vallicola</i>) Wheeler's dune-broom (<i>Chaetodelpha wheeler,</i>) Fell-fields claytonia (<i>Claytonia megarhiza</i>) Kern Plateau bird's-beak (<i>Cordylanthus eremicus</i> ssp. <i>kernensis</i>) Hall's meadow hawkbeard (<i>Crepis runcinata</i> ssp. <i>hallii</i>) Panamint rock-goldenrod (<i>Cuniculotinus gramineus</i> (<i>Chrysothamnus</i> g.)) Globose cymopterus (<i>Cymopterus globosus</i>) July gold (<i>Dedeckeraeurekensis</i>) California draba (<i>Draba californica</i>) White Mountains draba (<i>Draba monoensis</i>) Mt. Whitney draba (<i>Draba sharsmithii</i>) Male fern (<i>Oryopteris filix-mas</i>)</p>

Type	Common Name (Scientific Name)
Plants	<p>Gilman's goldenbush (<i>Ericameria gilmanii</i>)</p> <p>Compact daisy (<i>Erigeron compactus</i>) Limestone daisy (<i>Erigeron uncialis</i> var. <i>uncialis</i>)</p> <p>Alexander's buckwheat (<i>Eriogonum alexandrae</i> (<i>E. ochrocephalum</i> var. <i>ochrocephalum</i>))</p> <p>Pinyon Mesa buckwheat (<i>Eriogonum mensico/a</i>)</p> <p>Olancha Peak buckwheat (<i>Eriogonum wrightii</i> var. <i>o/anchense</i>)</p> <p>Yellow spinecape (<i>Goodmania luteola</i>)</p> <p>Rosette cushion cryptantha (<i>Greeneocharis circumscissa</i> var. <i>rosu/ata</i> (<i>Cryptantha circumscissa</i> var. <i>rosu/ata</i>))</p> <p>Beautiful cholla (<i>Grusonia pulchella</i>)</p> <p>Poison Canyon stickseed (<i>Hackelia brevicula</i>)</p> <p>Sharsmith's stickseed (<i>Hackelia sharsmithii</i>)</p> <p>Blandow's bog moss (<i>He/odium blandowii</i>)</p> <p>Jaeger's hesperidanthus (<i>Hesperidanthus jaegeri</i>)</p> <p>White Mountains horkelia (<i>Horkelia hispidula</i>)</p> <p>Short-leaved hulsea (<i>Hu/sea brevifolia</i>)</p> <p>Inyo hulsea (<i>Hu /sea vest/ta</i> ssp. <i>inyoensis</i>)</p> <p>Field Ivesia (<i>Ivesia campestris</i>)</p> <p>Alkali Ivesia (<i>Ivesia kingii</i> var. <i>kingie</i>)</p> <p>Fivepetal cliffbush (<i>Jamesia americana</i> var. <i>rosea</i>)</p> <p>Seep kobresia (<i>Kobresia myosuroides</i> (<i>K. be/lardii</i>))</p> <p>Lance-leaved scurf-pea (<i>Ladeania /anceo/ata</i> (<i>Psoralidium lanceolatum</i>))</p> <p>Inyo biscuitroot (<i>Lomatium foeniculaceum</i> ssp. <i>inyoense</i>)</p> <p>Mono Lake lupine (<i>Lupinus duranii</i>)</p> <p>Father Crowley's lupine (<i>Lupinus padre-crowleyi</i>)</p> <p>Inyo blazing star (<i>Mentzelia inyoensis</i>)</p> <p>Torrey's blazing star (<i>Mentzelia torreyi</i>)</p> <p>Sweet-smelling monardella (<i>Monardella beneofens</i>)</p> <p>Bristlecone cryptantha (<i>Oreocarya roosiorum</i> (<i>Cryptantha roosiorum</i>))</p> <p>Blue pendant-pod oxytrope (<i>Oxytropis deflexa</i> var. <i>sericea</i>)</p> <p>Limestone beardtongue (<i>Penstemon calcareus</i>)</p> <p>Marble rockmat (<i>Petrophyton caespitosum</i> ssp. <i>acuminatum</i>)</p> <p>Inyo phacelia (<i>Phacelia inyoensis</i>)</p> <p>Mono phacelia (<i>Phace lia monoensis</i>)</p> <p>Charlotte's phacelia (<i>Phace/ia nashiana</i>)</p> <p>Silver bladderpod (<i>Physaria ludoviciana</i>)</p> <p>Nevada ninebark (<i>Physocarpus alternans</i>)</p> <p>Parish's popcornflower (<i>Plagiobothrys parish/i</i>)</p>

Type	Common Name (Scientific name)
Plants	<p>Mason's sky pilot (<i>Polemonium chartaceum</i>) Williams comb leaf (<i>Polyctenium williamsiae</i>) Narrow-leaved cottonwood (<i>Populus angustifolia</i>) Morefield's cinquefoil (<i>Potentilla morefieldif</i>) Beautiful cinquefoil (<i>Potentilla pulcherrima</i>) Frog 's-bit buttercup (<i>Ranunculus hydrocharoides</i>) Redspined fishhook cactus (<i>Sc/erocactus polyancistrus</i>) Fringed chocolate chip lichen (<i>Solorina spongiosa</i>) Fivefinger chickensage(<i>Sphaeromeria potentilloides</i> var. <i>nitrophila</i>) Prairie wedge grass (<i>Sphenopholis obtusata</i>) Small-flowered ricegrass (<i>Stipa divaricate</i>) Alpine jewelflower (<i>Streptanthus gracilis</i>) Masonic mountain jewelflower (<i>Streptanthus o/iganthus</i>) Horned dandelion (<i>Taraxacum ceratophorum</i>) Dune horsebrush (<i>Tetradymia tetrameres</i>) Foxtail thelypodium (<i>The/ypodium integrifolium</i> ssp. <i>complanatum</i>) • Many -flowered thelypodium (<i>The/ypodium milleflorum</i>) Slender townsendia (<i>Townsendia leptotes</i>) Virgate halimolobos (<i>Transberingia bursifolia</i> ssp. <i>virgata</i> (<i>Halimo/obos</i> v.)) Little bulrush (<i>Trichophorum pumilum</i>) Dedecker's clover (<i>Trifolium dedeckerae</i> (T. <i>kingii</i> ssp. <i>dedeckerae</i>)) Golden violet (<i>Viola purpurea</i> ssp. <i>aurea</i>)</p>

• Note recent taxonomic name changes as specified