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SEPA Responsible Official
Washington Department of Fish and Wildlife

SUBJECT: DNS 23-049: PYGMY RABBIT HABITAT ENHANCEMENT - Douglas County

As noted in part B.4.c. of the SEPA Checklist, a rare plant, *Sandbergia perplexa* [*Halimolobos perplexa* var. *perplexa*], occurs within the project area (Section 16). This occurrence is located in an area where the land management strategy is listed as mowing. It would be beneficial for this rare species to delay mowing until after the growing season. More information for *Sandbergia perplexa*, including phenology, can be found on our field guide page, <https://fieldguide.mt.gov/wa/?species=sandbergia%20perplexa>.

Not noted in the SEPA Checklist is the occurrence of a state sensitive ecosystem in Section 28, *Artemisia tridentata* ssp. *wyomingensis* / *Pseudoroegneria spicata* Shrub Grassland. This ecosystem would be impacted by a prescribed burn, the land management strategy listed for this portion of the project area. Generally, habitat enhancement for pygmy rabbit should correspond with improved integrity of the shrub-steppe ecosystem itself. The site has not been surveyed since 1996, but our database indicates that shrub density had increased—and bunchgrass density decreased—due to past grazing. The WNHP ecologist also noted somewhat low forb diversity, ~70% cover of biotic crust (w/ moderate diversity), and low cover of annual grasses aside from near animal burrows. It is possible that a prescribed fire may help restore the relative cover of shrubs and herbs to within the historic range, especially if paired with intensive weed management in the aftermath. However, the use of heavy equipment may be detrimental to the soil condition and biotic crust, which may end up promoting annual grass establishment in the long-run. More information for this ecosystem can be found on NatureServe's Explorer page, [https://explorer.natureserve.org/Taxon/ELEMENT_GLOBAL.2.683130/Artemisia tridentata ssp wyomingensis - Pseudoroegneria spicata Shrub Grassland](https://explorer.natureserve.org/Taxon/ELEMENT_GLOBAL.2.683130/Artemisia_tridentata_ssp_wyomingensis_-_Pseudoroegneria_spicata_Shrub_Grassland).

If you have any questions about these occurrences, please feel free to contact us.

Best,

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<http://www.dnr.wa.gov/natural-heritage-program>