

[REDACTED]

From: [REDACTED]
Sent: Friday, May 19, 2023 9:59 AM
To: [REDACTED]
Subject: FW: Comments on the Docket PCN5

Comments received.

[REDACTED]

From: Karen Antell [REDACTED]
Sent: Thursday, May 11, 2023 11:49 AM
To: [REDACTED]
Subject: Comments on the Docket PCN5

Comments on the Docket PCN5

Date: 11 May 2023

To: Oregon Public Utilities Council

From: Karen Antell, PhD
Botany Professor Emeritus
Eastern Oregon University
[REDACTED]

RE: Concerns about protection for *Pyrrocoma sp. nov.*

I am writing to express my concerns regarding ensuring protections for an undescribed new species of flowering plant in Union County, Oregon. The only known locations for this plant are in and around the La Grande area. Glass Hill has not been extensively surveyed for the plant, but it is known to occur in the vicinity of Morgan Lake Park within the area expected to be impacted by Idaho Power's proposed Boardman to Hemmingway power transmission line.

I understand that according to Oregon Administrative Rules, a potentially new species which has not yet been described in the scientific literature does not qualify for threatened or endangered species listing and/or other state protections. However, this failure of Oregon statutes should not compromise the expectation that Oregonians have that the state would make every effort to protect all of its biodiversity for future generations, especially species that are known to occur only within Oregon.

Discovery of a species that is new to science is an exciting opportunity for gaining better understanding of uniqueness of habitats. This is especially important in rural areas in which scientific exploration has not been conducted at the same levels as more populated and well-known areas. In fact, these understudied areas may hold many more new discoveries in future, if the biological communities can be kept intact long enough for those studies to take place.

This new species should be granted emergency interim protection until the process of official scientific description, publication, and state recognition can be completed. The proscribed steps are necessary in order to ensure that the newly described species meets all criteria for scientific recognition, and that we have a reasonable understanding of its distribution within Oregon.

I am asking that you give this plant a chance to be formally recognized as a species, and receive the protections that any other threatened or endangered species within Oregon should be granted.

Sincerely,