

The following comments are in reference to this document:

**Biological Survey Report for the Proposed Project Site Near Dresser, Polk County Wisconsin; by David C. Kramer, Consulting Biologist.**

**General Comments:**

This survey is of limited use as a biological survey for a number of reasons. The surveyor only visited the site during one time of the year, and it was early in the growing season. A number of plant species with potential to occur on this site do not bloom until much later in the growing season. It is standard practice to survey for rare plants at least two times during the growing season, so as to account for plants with different blooming times (when they are most detectable). Also, the surveyor does not acknowledge the potential for a number of rare species to occur on the site. Based on his habitat descriptions, there are several species of rare plants and at least one rare animal that have potential to occur there (specific comments are below).

The surveyor's references include plant identification books that are not applicable to the site, because of its geographical location. "Tallgrass Prairie Wildflowers" and "Wildflowers, Grasses and Other Plants of the Northern Plains and Black Hills" are both listed in the surveyors' reference list, but neither of these have complete relevance to the site in question. While some of the plant species at the site may overlap with these guides, there are several that do not.

The surveyor does not mention the significance of the natural community itself that comprises a good amount of the site – bedrock glade. This is a natural community that is rare, not only in Wisconsin (S3 rank – rare or uncommon in Wisconsin), but in the Midwest as well, with a global rank of G2 – Imperiled globally because of rarity or because of some factors making it very vulnerable to extinction throughout its range. While rare plant and animal species are not always present on the bedrock glades of Polk County, the natural community itself is rare, and warrants mention in this biological assessment.

In summary, this survey would be deemed insufficient for the purposes of a biological assessment by the standards of the Wisconsin Department of Natural Resources.

**Specific Comments:**

- **Page 1, Executive summary “No other WNI listed plants or animals were found during the survey and are not likely to be found on the site.”**

The following rare plant species have potential to occur on the site, based on the habitat descriptions provided in the survey notes: 1. Phemeranthus rugospermus (Special Concern) 2. Besseyia Bullii (Threatened) 3. Liatris punctata var nebraskana (Endangered) 4. Asclepias ovalifolia (Threatened). Additionally, Northern prairie skink (Special Concern lizard) are known from similar habitat within Polk County. Regardless if any of these species are found on the site, the surveyor did not acknowledge that suitable habitat existed for them and did not search for them at the appropriate time of year (see following point).

- **Page 2, Survey dates – May 11, 12, and 20.**

Peak flowering time for some of the abovementioned species is much later than mid – May in Polk County. Phemeranthus rugospermus, for example, is a diminutive species and difficult to find when it is not flowering. The optimum identification period for this species begins in July in Polk County. The habitat described by the surveyor is likely habitat for this species, and it is known from other sites within the Osceola Township.

- **Page 2, paragraph 4 – survey methods.**

Based on the surveyor’s description, the site varies with respect to vegetative cover types. Because of that, a random meander within each respective cover type would be a more appropriate method of surveying for rare plant species. The method described, in which fixed transects are walked, is not sufficient to find some of the rare plant species listed above. The surveyor does mention that he strayed from the transects if appropriate habitat was seen from the transect. Given that his transects were spaced 30 yards apart, it is possible that he did not see some of the ‘micro-habitats’ between them, where some of the abovementioned plant species might occur.

- **Page 5, paragraph 1. “Given the habitat requirements of the other endangered or threatened plants on the WNHI list, it is my determination that it is not likely that any of them occur on the site at this time.”**

Again, both Phemeranthus rugospermus and northern prairie skink are known from similar habitat (bedrock glades) within the Osceola Township.

- **Page 5, paragraph 2. “However, this survey is not a comprehensive flora/fauna study and that it is possible that a more definitive study could result in other findings.”**

This statement makes it unclear what the purpose of the survey was, given that the opening statement in the document is the following:

‘Purpose: To conduct a biological survey of the proposed site to determine the probability or the occurrence of threatened or endangered species.’