



January 27, 2018

RE: GRAND MESA, UNCOMPAHGRE AND GUNNISON FORESTS Draft Forest Assessment: Identifying and Assessing At-Risk Species

To: GMUG Planning Team:

Thank you for the opportunity to comment on the above Assessment. Below are corrections, comments and suggestions from the Colorado Native Plant Society:

1. Page 2, #1, 2nd bullet, 5th line: When "Colorado Natural History Program" is mentioned, are you actually referring to Colorado National Heritage Program?
2. Page 10, 2nd paragraph, last sentence: 'In particular, alpine areas on the GMUG that have remnant roads from historic mining development now see high levels of OHV use (some of it illegal off-trail use) that causes significant soil impacts.' Is there any plan to eliminate the stressor of illegal off-trail use in these particular alpine areas?
3. Page 11, last paragraph: This is an excellent description of why roads and trails are destructive to natural habitats, and excellent reasons why no new ones should be made through these areas. You mention you have no data on specific impacts of specific roads in the plan area and there are several other instances in this report where there is 'no current data.' It appears that the GMUG Forest is in dire need of more help collecting data and monitoring the forest. In other documents online, you've asked the public to be involved in citizen science projects. Have these projects come to fruition? Have you been able to start any 'data collection/monitoring programs with volunteers? If so, please let us know and we will 'advertise' the programs in our twice-monthly E-News and quarterly newsletter, *Aquilegia* so our 1000+ members will have the opportunity to volunteer to assist you.
4. Page 15 last paragraph, last sentence: 'There is active and ongoing timber harvest taking place in spruce-fir forest on the GMUG as part of the SBEADMR....' Is care is being taken when diseased timber is being removed, to ensure the safety of any native plants of concern in the area(s), and is there a specific plan for restoration?
5. It's obvious that climate change is going to be an immense threat to native plant habitats. Again, data collection and monitoring are going to be absolutely essential, and most likely will require yearly efforts. Does the Forest Service have any plans to hire more staff, preferably experienced Botanists? Most of the plants listed in the Assessment haven't been documented in years.

6. Appendix 1 - Page 116, DeBeque Phacelia, 3rd paragraph, 3rd line: 'Livestock are not permitted on this portion of the national forest, nonetheless there is some trampling damage at two populations from trespass cattle from adjacent BLM public land.' Are there any plans to restrict access to the two populations?

7. Appendix 2: Species Initially Considered, but removed from consideration based on 'known to occur' criteria: Having additional botanical staff would indeed enable GMUG to confirm the existence or non-existence of these particular plants.

If GMUG requires future assistance from the Colorado Native Plant Society, please do contact us. We're all 'in this' together, and anything we can do to help, we'd be more than happy. Our Chapters hold monthly local programs and field trips throughout the year, we have 6-8 workshops on various topics throughout the year, and we can help 'spread the word', through education and on-the-ground conservation efforts. Please consider taking advantage of our partnership to help protect the native plants and habitats of Colorado. Thank you.

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