



Colorado Native Plant Society

Matthew M. McCombs
Attn: Pamela King
Gunnison Ranger District
216 North Colorado
Gunnison, CO 81230

November 21, 2018

RE: GRAND MESA, UNCOMPAHGRE AND GUNNISON NATIONAL FORESTS public comment period on the Monarch-Marshall Pass Vegetation Management Project proposal

Dear District Ranger Matthew M. McCombs,

Thank you for the opportunity to comment on the above proposal. Below are comments and suggestions from the Colorado Native Plant Society after having read the project proposal and Design Feature:

We understand the reasoning behind the desire to log and reduce fuels in this area. However, the project is proposed at elevations over 10,000 feet where soils are gravelly granitic and very fragile. It takes a long time to revegetate areas at these elevations. We have 3 primary concerns in the proposed project area: rare plants, the Monarch Potential Conservation Area (PCA), and fens. One of those rare plants in the Design Feature, *Astragalus leptaleus*, grows only in lower elevation sagebrush community wetlands in the Gunnison Basin and would not likely be found in the project area. Because of the gravelly granitic soils and elevations over 10,000 feet, openings within the conifer canopy would be generally good habitat for any moonworts (*Botrychiums*). According to SEINET, *Botrychium hesperium* (G4 S3), *Botrychium lanceolatum* (G5T4 S3), and *Draba streptobrachia* (G3 S3) are known to exist in the PCA near the project area. They are likely to exist in the project area, too.

Fen habitat is also likely to be found in the project area because of the high elevations. Barry Johnston, retired USFS Botanist, identified a potential fen (9SA565) in the project area along the powerline but collected no data there. We also identified 5 other potential fens in the project area via Google Earth. Hopefully the USFS will conduct field surveys for *Eriophorum gracile*, *Eriophorum altaicum*, *Eriophorum chamissonis*, *Trichophorum pumilum*, *Carex lasiocarpa*, *Carex diandra*, *Utricularia minor*, *Pleurozium schreberi*, as well as any other rare plants and mosses? According to the Design Feature, fens would be given 100' clearance from logging operations. 100' may or may not provide protection to fens (Jones 2003). If fens are not identified on the ground, they may be lumped into a "spring, seep, or wetland" Feature, which

according to the Design Feature, would only get 25' clearance. It is of the utmost importance to us that fens and fen hydrology are protected, as these ecosystems are thousands of years old and sensitive to impacts. In addition to this, we would ask you to include "avoiding driving over fens with or without snow" in your Design Feature. Snow compaction has been shown to freeze peat in fens and alter fen plant phenology (see Prospect Basin Telluride Fen Report).

The Invasive Weeds Design Features look great! Thanks again for the opportunity to comment!

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