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

May 2nd, 2019

RE: GRAND MESA, UNCOMPAHGRE AND GUNNISON NATIONAL FORESTS public comment period on the Taylor Park 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 Features:

We understand the reasoning behind the desire to log and reduce fuels in this area. However, the project is proposed at high elevations over 9,500 feet where soils are gravelly granitic and very fragile. It takes a long time to revegetate areas at these elevations. We have 2 primary concerns in the proposed project area: fens and rare plants (including lichens and mosses). 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 9,500 feet, openings within the conifer canopy would be generally good habitat for any moonworts (*Botrychiums*). A CDOT field survey conducted by David Buckner, PhD. in the 1970's along the main Taylor Park Road from the reservoir up to Cottonwood Pass showed a variety of *Botrychiums* were present. They are likely to exist in the project area, too.

Fen habitat is found in the project area because of the high elevations, glacial topography, and ground water support. Barry Johnston, retired USFS Botanist, identified fens in the project area but did not collect data for every potential fen there. Additional potential fens in the project area can be identified via Google Earth (see attached map). We highly recommend surveying the fens identified by Barry Johnston as well as additional fens identified via Google Earth. In Taylor Park the following fens and areas support rare plants. Taylor River Fen supports a population of *Carex diandra* (G5 S1) and *Utricularia minor* (G5 S2), two Forest Service Sensitive plant species. BotCot Fen supports a population of *Carex livida* (G5 S1) and boreal toads. Hobbs Fen supports a population of *Kobresia simpliciuscula* (G5S2) and *Lomatogonium rotatum* (G5 S2). Texas Lakes Fen maintains a population of *Carex lasiocarpa* (G5 S1). Along Texas Creek there is a population of *Trichophorum pumilum* (G5 S2), a BLM Sensitive species. Fens in this area may also have populations of rare plants, lichens, and mosses such as *Cladina arbuscula*, *Eriophorum gracile*, *Eriophorum altaicum*, *Eriophorum chamissonis*, *Pleurozium schreberi.*

According to the Design Feature, fens would be given only 100' clearance from logging operations. 100' may or may not provide protection to fens (Jones 2003). There is no other literature indicating that 100' is enough buffer distance to protect a fen from hydrologic disturbance. 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 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!

Gay Austin
Colorado Native Plant Society, Conservation Committee member