



## Colorado Native Plant Society

February 12, 2014

Dear Sir or Madam,

On behalf of the Colorado Native Plant Society, I would like to make some comments about your Statewide Comprehensive Outdoor Recreation Plan (SCORP) and in particular Goal 5 which states in part to “increase the capacity of land managers to effectively maintain and manage natural resources and recreation infrastructure...” and objective 4 which says, “continue efforts to prepare for and mitigate impacts on Colorado's natural resources from natural and anthropogenic causes.”

As a state-wide native plant society dedicated to protecting our native plants and plant communities we strongly recommend that whenever recreation infrastructure is built, modified or otherwise managed that it be done so with a strong mandate that studies be conducted to determine whether any sensitive or rare plants or plant communities are present, and to assure that these plants and plant communities be protected against recreational impacts.

In spite of the fact that goal 4 implies that this is being done (“continue efforts...to mitigate impacts”), this is not always the case. A clear example of the failure to protect critically-imperiled plants is currently occurring at Lake Pueblo State Park. Previous park managers (a new park manager, Monique Mullis has recently been appointed) have allowed the Southern Colorado Trail Builders to build, expand and maintain mountain bike trails within the park. These trails have been built without consideration for the presence of rare plants.

On the Southern Colorado Trail Builders website, their purpose is stated to “work with the Colorado State Park personnel at Lake Pueblo State Park to develop a manageable trail system.” In fact, what they have done is to build a huge network of social trails, through many sensitive and some extremely rare plant populations and other sensitive plant communities.

The most egregious example of this is found on the MU-5 North Shore section of the park. On the MU-5 North Shore map provided in the Resource Management Plan, these trails are shown as “social trails (unauthorized)” but they travel right through the middle of areas that are shown on the “Lake Pueblo SP and SWA Significant Resources Map” as containing “Rare Vascular Plants”. These rare plants include *Oenothera harringtonii* global ranking G2 (Arkansas Valley Evening Primrose), *Nuttallia chrysantha* G1G2 (Golden Blazing Star), *Asclepias uncialis* G3 Green's Milkweed, *Oenopsis puebloensis* G2 (Pueblo Goldenweed), and *Oxybaphus rotundifolius* G2 (Round-leaf Four-O'clock). Some of the trails pass right through the middle of these extremely globally-rare plant populations.

In spite of the fact that the park maps show these bicycle trails as “unauthorized” they are heavily promoted on the Southern Colorado Trail Builders website, and the Trail Builders’ maps which are distributed in the Visitor's Center and at the Arkansas Point trailhead. Also many “unauthorized” trails are given names and signage. These trails are also promoted by the Pueblo Area Council of Governments with their widely-distributed “Pueblo Bicycle and Trails Map.”

We strongly recommend that your Statewide Recreation Plan give high priority to protecting sensitive and rare plant communities from the negative impacts of recreation.

Sincerely,  
Mo Ewing  
Chairman, Conservation Committee