



## Colorado Native Plant Society

July 30, 2014

Colorado Parks and Wildlife  
State Wildlife Action Plan  
dnr\_swap\_input@state.co.us

Dear Sir or Madam,

The purpose of this letter is to provide input on the revision of the Colorado Wildlife Action Plan (SWAP).

The Colorado Native Plant Society strongly supports including Colorado plants that are critically imperiled (status G1) or imperiled (status G2) in the Wildlife Action Plan, as has been done in many other states. We understand that CPW plans to do this over the next year, working with members of the Colorado Natural Heritage Program (CNHP). We strongly support these efforts.

Over the last ten years, members of our society have worked on the Colorado Rare Plant Initiative to develop a support system to protect rare and endangered plants. During that period, we identified all G1 and G2 plant species in Colorado, determined threats for each species, and created conservation goals for each. We understand that taking on 120 new species is not an insignificant task for Parks and Wildlife and that you probably do not have staff to accomplish this task. For that reason we recommend that you provide staff time and financial support to the Rare Plant Initiative to carry out these responsibilities for you. The most logical institution for administering this support is CNHP.

Currently, the SWAP categorizes plant communities into six types which are common to both wildlife and plants. However, there are two additional plant communities which are important to plants that are not currently identified in the Plan. Both “cliff and canyon”, and “barrens” communities contain the highest numbers of rare and endangered plants and therefore should be included in the plan. These two habitat types are currently in relatively good condition state-wide. However, in the future they may be increasingly threatened by motorized recreation and oil and gas development.

We also recommend that when writing the Wildlife Action Plan, that you not only identify the plant species of concern, but also identify the plant communities in which they reside for conservation. This would be similar to designating critical habitat under the Endangered Species Act.

In addition to identifying plant species that are imperiled, the Natural Heritage Program has identified 69 plant communities that are either critically imperiled (G1) or imperiled (G2) world-wide, but are found in Colorado. We recommend that these plant communities be included for conservation purposes in the State Plan. A list of these plant communities is attached to this letter.

Many of these plant communities are included in Colorado Natural Heritage Program's list of “Potential Conservation Areas” PCAs across the state. These areas are designated as containing “high biological diversity” and many contain many rare plant species. Thirty-two of these PCAs are designated as B1 “Outstanding Biodiversity” and could be targeted in the plan for conservation.

We appreciate your invitation to comment on the SWAP and look forward to working with you to protect Colorado's outstanding rare plants and plant communities.

Sincerely,

Mo Ewing  
Conservation Chair  
Colorado Native Plant Society