



Colorado Native Plant Society

Dan Dallas, Supervisor
Rio Grande National Forest
1803 W. Highway 160
Monte Vista, CO 81144

July 3, 2017

Dear Supervisor Dallas:

I am writing today on behalf of the Colorado Native Plant Society to express our strong support for the designation of iconic places on the Rio Grande National Forest in the revised land management plan. In particular we are recommending the inclusion of the whole Elephant Rocks Potential Conservation Area as described by the Colorado Natural Heritage Program as a designated wilderness area. The Colorado Native Plant Society has 6 chapters across the state, with two chapters on the west slope. Our organization is “a non-profit organization dedicated to furthering the knowledge, appreciation and conservation of native plants and habitats of Colorado through education, stewardship and advocacy”. As such we are particularly interested in the protection of rare and endangered plants which will be encompassed by your management plan.

We support the 17 areas recommended for wilderness by The San Luis Valley Ecosystem Council, The Wilderness Society, Defenders of Wildlife, Rocky Mountain Wild and others as summarized in the attached handout. We urge you to recommend these areas for wilderness in the revised plan and Record of Decision. Because we have a particular focus on rare and endangered native plant species and habitats, we particularly wish to draw your attention to the Elephant Rocks Potential Conservation Area.

This site lies at the base of the San Juan foothills on the Saguache-Rio Grande County line. It is comprised of a complex of volcanic boulders, rock outcrops, and shrublands separating the prairie of the valley floor from the San Juan Mountains and contains several rare plant species.

The first of these is Slender Spider Flower (*Cleome multicaulis* - G2G3 S2S3) which is restricted to wet meadows and alkaline flats. It is widely distributed in Mexico and probably brought to CO by the early Spanish settlers. With the draining of wetlands it has become quite rare in CO.

The second species is Rock-loving Neoparrya (*Aletes lithophilus* – G3S3) which occurs only in igneous outcrops or sedimentary rock derived from extrusive volcanics, north-facing cliffs and ledges, within pinyon-juniper woodlands. It is endemic to Colorado in Chaffee, Conejos, Fremont, Huerfano, Rio Grande and Saguache counties. This species is only known from ten sites in these counties. Its population has an estimated 2000 individuals.

In addition, *Astragalus cerussatus* a watch-list species (G3G4 S3S4) is a milkvetch which occurs in northern New Mexico and southern Colorado on rocky slopes. Less than 20 occurrences have been located throughout its range.

And finally, another watch-list species, Forked Spleenwort (*Asplenium septentrionale* - G5 S3S4), a grass fern, is found here, representing the southernmost extension of this uncommon fern, and is a new county record for Saguache.

In order to protect these rare native plants, it is critical not to just protect the footprint on which they occur, but also to protect the habitat that surrounds them which are critical to their survival. In designating the boundaries of the conservation area, the Natural Heritage Program provided the following justification:

“This boundary encompasses an area in which direct impacts to the elements, such as trampling or other surface disturbance, should be avoided and provides suitable habitat where additional individuals can become established over time. The boundary also encompasses Shaw Springs to ensure the hydrological source necessary for the viability of the slender spiderflower.

The main threat to the rock-loving neoparrya would be physical disturbance of the habitat. The boundary was delineated to include the known extent of the plant population and enough of the adjacent area to incorporate portions of other habitat types. This additional habitat was included based on the assumption that pollinators of the rock-loving neoparrya may also require other types of habitat. The pollinators are unknown, consequently we are uncertain if the amount of adjacent habitat is sufficient to support those species. With more information, these boundaries may change. This boundary is drawn to 1) protect the occurrences from direct impacts such as trampling or other surface disturbances; and 2) provide suitable habitat where additional individuals can become established over time”.

In order to protect these important natural resources, we recommend that you not only give them the highest level of protection, but also assure that these areas remain free from any activities that may result in trampling from various forms of recreation.

Sincerely,

A handwritten signature in black ink that reads "Mo Ewing". The signature is written in a cursive, flowing style.

Mo Ewing
Chair, Conservation Committee
Colorado Native Plant Society

**San Luis Valley Ecosystem Council
Recommended Wilderness Areas
in the Land Management Plan Revision**

Saguache Ranger District

Antora Meadows (27,700 acres)

- Will significantly increase representation of ecosystems currently under-protected (lodgepole pine, aspen forest/woodland and grassland).
- Will increase conservation of imperiled or at risk species including Rio Grande cutthroat trout conservation population; habitat for lynx, wolverine, and Mexican spotted owl.
- Key piece in landscape connectivity, helping fill the largest gap in protected areas in the Southern Rockies between La Garita Wilderness on south and Collegiates and Sangres to north. Significant portion of Cochetopa Hills roadless complex, one of the largest remaining unprotected roadless areas in Colorado.
- Significant trail system with looping opportunities and connections to CDNST.
- Low conflict with no interior motorized trails other than system trail 764 which is apparently unused and unmaintained.
- Upper Tier Colorado Roadless Area, located in Saguache County.
- Western boundary would be PSCO gas pipeline, eastern boundary extent of inventory area (over to FDR 861 generally).

Elkhorn (15,800 acres)

- Important landscape connectivity link near Poncha Pass.
- Will significantly increase representation of ecosystems currently under-protected (lodgepole pine, aspen forest/woodland and grassland, ponderosa pine).
- Potential habitat for lynx and wolverine.
- Low conflict with no motorized trails.
- Upper Tier Colorado Roadless Area, located in Saguache County.

Saguache Creek (Four Mile Creek–Taylor Canyon) (27,100 acres)

- Will significantly increase representation of ecosystems currently under-protected with 15,000 acres of grasslands and ponderosa pine.
- Potential habitat for lynx and Mexican spotted owl.
- Important piece in landscape connectivity, helping fill the largest gap in protected areas in the Southern Rockies between La Garita Wilderness on south and Collegiates and Sangres to north.
- Diverse ecosystem ranging from grasslands/ponderosa to spruce, and 7 miles of Saguache Creek eligible wild river.
- Significant recreation opportunities highlighted by Saguache Creek trail and other non-motorized trails.
- Upper Tier Colorado Roadless Area, located in Saguache County.

Sangre de Cristo addition Crestone area (Kit Carson Peak, Cotton Creek) (23,300 acres)

- Will significantly increase representation of ecosystems currently under-protected particularly

for pinyon-juniper woodland and riparian forests.

- Includes potential extensions of Mill Creek and Deadman Research Natural Areas.
- Provides for topographically continuous boundary along lower slopes of the Sangres by slotting corner of acquired Baca Grant parcel into wilderness.
- Contains well-known primitive recreation destinations such as 14,000-foot Kit Carson Peak and Challenger Point.
- Adjacent to National Park Service recommended wilderness in Great Sand Dunes expansion.
- Low conflict with no motorized trails, in Saguache County.

Sangre de Cristo addition north end (Butterfly Creek-Miller Creek) (4,100 acres)

- Will increase representation of currently under-protected ecosystems particularly grasslands and oak shrublands.
- Potential habitat for lynx and Mexican spotted owl, some use by Gunnison sage grouse.
- Vicinity of Poncha Pass lynx linkage area.
- Non-motorized trails, in Saguache County.

Sawlog (17,900 acres)

- Will significantly increase representation of currently under-protected ecosystems, particularly grasslands, ponderosa pine, and aspen/woodlands.
- High potential for species conservation with Rio Grande cutthroat trout conservation population; documented used by lynx.
- Low conflict with no interior motorized trails.
- Upper Tier Colorado Roadless Area, located in Saguache County.

Divide Ranger District

La Garita addition west side – Wason Park (22,000 acres)

- Will significantly increase representation of currently under-protected ecosystems, specifically grasslands.
- Bighorn sheep migration route.
- Expands wilderness to encompass additional 8 miles of Continental Divide, protecting south/east side of the Divide to its crest.
- Increases size of existing wilderness by 15%.
- Provide trailheads nearest to Creede into La Garita Wilderness.
- Non-motorized trails.
- Upper Tier Colorado Roadless Area, in Mineral County.

La Garita additions east side – Lake Fork, Wannamaker Creek, Deep Creek (14,700 acres)

- Will significantly increase representation of currently under-protected ecosystems, particularly grasslands.
- Documented lynx use, wolverine habitat, Rio Grande cutthroat trout.
- Expands wilderness to encompass additional 3 miles of Continental Divide, protecting east side of the Divide to its crest (Lake Fork addition).
- Non-motorized trails in Middle Fork, Wannamaker Creek, and Deep Creek that lead to La

Garita Wilderness boundary.

- Upper Tier Colorado Roadless Area, in Saguache County.

Pole Creek Mountain & Sheep Mountain (24,800 acres)

- Significant landscape connectivity link filling gap amidst encircling protected areas at headwaters of Rio Grande, Lake Fork Gunnison, and Animas rivers. Adjacent to other agency recommended wilderness – GMUG draft 2006 proposed Carson wilderness and BLM proposed Handies Peak wilderness.
- Modest contribution to representation of under-protected ecosystem types, potentially for grasslands.
- High potential for species conservation with one of few known Uncompahgre fritillary populations, high use by lynx, two potential RNAs for only known global occurrences of stonecrop gilia, wolverine habitat.
- Significant backcountry recreation use on CDNST/Colorado Trail, and interconnected trail system over the Divide into non-mechanized trails on the GMUG.
- Can avoid motorized trail conflicts with boundary modification to create distinct Pole Creek Mountain unit and adjacent Sheep Mountain unit to west.
- Upper Tier Colorado Roadless Area, located in Hinsdale and San Juan counties.

Weminuche addition – Snowshoe Mountain (34,300 acres)

- Will significantly increase representation of currently under-protected ecosystems particularly, grasslands and dry mixed conifer forest.
- Highest species conservation score with high use by lynx, boreal toads.
- Landscape connectivity link between Weminuche and La Garita wildernesses.
- Largest unprotected roadless area adjacent to Weminuche wilderness.
- Non-motorized trails including Deep Creek just outside Creede, which would create a wilderness trailhead nearest to a surrounding community into the Weminuche Wilderness.
- Upper Tier Colorado Roadless Area, in Mineral County.

Conejos Peak Ranger District

North Fork Rock Creek (16,500 acres)

- Northeast portion of Bennet Mountain roadless area consists primarily of North Fork Rock Creek.
- Will increase representation of currently under-protected ecosystems, particularly grasslands, ponderosa pine, pinyon-juniper, dry mixed conifer forest.
- Includes potential habitat for lynx, Mexican spotted owl, wolverine.
- Non-motorized trails, and provides for a protected wilderness experience in a landscape otherwise devoted largely to motorized recreation.
- Upper Tier Colorado Roadless Area, in Conejos County.

Sangre de Cristo addition – Blanca Peak (4,200 acres)

- Southern end of the Sangre de Cristos, beyond Como Lake.
- Will increase representation of currently under-protected ecosystems, particularly grasslands, ponderosa pine, and pinyon-juniper woodland.

Includes two popular fourteeners – Blanca Peak and Little Bear Peak.

- Overlaps Blanca Peak traditional cultural property of significance to native peoples.
- In Alamosa County.

South San Juan addition – Adams Fork-Three Forks (2,700 acres)

- High species conservation potential with high use by lynx, wolverine habitat.
- Non-motorized trails leading to wilderness boundary.
- Upper Tier Colorado Roadless Area, in Conejos County.

South San Juan addition – Elk Creek (3,200 acres)

- Expands representation of currently under-protected ecosystems by including robust stands of ponderosa pine, grasslands.
- Connectivity enhancement as lynx movement corridor to New Mexico.
- Incorporates first 4 miles of the non-motorized Elk Creek Trail from the trailhead into adjacent wilderness.
- Upper Tier Colorado Roadless Area, in Conejos County.