



Colorado Native Plant Society

July 2, 2019

Lochen Wood
Canyon Lakes Ranger District
2150 Centre Avenue, Building E
Fort Collins, CO, 80526

Dear Mr. Wood,

The purpose of this letter is to comment upon the Jacks Gulch Fuels Management Project.

In the Proposed Action Plan you outline an extensive area which is designated as “Potential Manual Thin from Below Treatment Areas” in which you plan to thin by hand. I have enclosed a map which shows that your manual thinning plan covers three areas designated by the Colorado Natural Heritage Program (CNHP) as Potential Conservation Areas (PCSA). Each of these areas contain occurrences of globally rare plant communities:

The Salt Cabin Park PCSA contains an extant occurrence of the globally imperiled (G2/S2) *Purshia tridentata*/*Muhlenbergia montana* plant community. The site also supports an occurrence of the globally imperiled (G2/S2) *Muhlenbergia montana*-*Stipa comataplant* community.

The Bennett Creek PCSA contains three occurrences of the globally imperiled (G2/S2) *Juniperus scopulorum* / *Purshia tridentata* plant community.

Fish Creek Campground contains one occurrence of the globally imperiled (G2/S2) *Purshia tridentata* / *Muhlenbergia montana* plant community.

The Black Hollow Creek shown on the map does not contain any rare plant communities but is designated as a PCSA in order to provide buffers on the slopes of the canyon that are believed to be sufficient to protect water quality for Greenback Cutthroat Trout in the creeks below.

We urge you, before conducting the thinning project in the CNHP Potential Conservation Areas, to obtain the exact location of these rare plant communities from CNHP and to conduct your thinning activities in a manner that protects and promotes the their health.

Thank you very much for giving us the opportunity to comment on your forest plan.

Sincerely,

Mo Ewing
Chairman, Conservation Committee
Colorado Native Plant Society