



## Colorado Native Plant Society

Hahn's Peak/Bears Ears Ranger District  
Attention: Kevin Thompson  
300 Roselawn Ave.  
Yampa, CO 80483

RE: Bears Ears Fuels Reduction and Restoration Project

Via electronic form: <https://forms.office.com/g/UjEfNTd31B>

May 19, 2023

Dear Mr. Thompson:

Thank you for the opportunity to comment on the proposed Bears Ears Fuels Reduction and Restoration Project in Routt and Moffatt Counties, Colorado.

Founded in 1976, the Colorado Native Plant Society is a 501(c)(3) non-profit organization dedicated to furthering the knowledge, appreciation and conservation of native plants and habitats of Colorado through education, stewardship and advocacy. We have seven geographical chapters located throughout the state.

In reviewing the Project and Documentation (PAD) for this project, we note that there is no mention of relevant documents produced by Colorado's only comprehensive source of information on the status and location of Colorado's rarest and most threatened species and natural plant communities – the Colorado Natural Heritage Program (CNHP) at Colorado State University.

After extensive fieldwork, CNHP has described 1,853 sites in Colorado as Potential Conservation Areas (PCAs). As the CNHP web site states: "PCAs highlight areas in the state contributing to Colorado's biological diversity. Their boundaries encompass rare species and natural plant communities and reports often contain valuable information on ecological conditions, unique ecological communities, and management recommendations."

While the project area contains several locations designated by CNHP as PCAs, most have been designated to protect the sandhill crane, a bird which is certainly most worthy of your continued protection, and we hope your decision will in no way compromise its habitat. However, in regards to native plants and plant communities, we wish to draw your attention especially to the Slater Park PCA.

In their description of this area, CNHP writes: "This site encompasses a good (B-ranked) occurrence of the globally vulnerable (G3/S3) *Picea pungens* - *Alnus incana* montane riparian forest, an excellent to good (AB-ranked) occurrence of the globally vulnerable (G3/S3) *Salix wolfii* - mesic forb shrubland, good to fair (BC-ranked) occurrences of *Salix boothii* / mesic graminoids (G3/S3) and *Carex aquatilis* wetland (G5/S4)...".

As you are no doubt aware, a G3 or S3 ranking means that the element (indicated by the '3') is 'Vulnerable to Extinction' on a global and/or state level (indicated by the 'G' or 'S'). Therefore, whatever actions you take with regard to fuels reduction and fire suppression in this project should contain provisions to ensure that these plants and plant associations are not negatively impacted. Avoidance of impacts, whether direct impacts through road construction, building of fire lines, etc. or indirect impacts, through water depletion, contamination, or loss of associated insect habitats, should be the baseline.

Please contact CNHP for more detailed information on the exact locations of these plant associations in the project area.

We also hope that in future actions, the US Forest Service will, as a matter of course, include the analysis of impacts on Potential Conservation Areas, especially as they respect plants and plant associations. CNHP's professional-level information should be a regular part of your agency's analysis, and we urge you to contact CNHP to get their further recommendations on how to preserve these values which are so important to our members, our state, and our ecosystems.

Thank you.

Sincerely,

Brad Klafehn, Co-chair, Conservation Committee, Colorado Native Plant Society