

# **Comments by the Conservation Committee of the Colorado Native Plant Society on CPW's Initiation of a Revised 10-Year Strategic Plan**

May 26, 2025 [V4]

The Conservation Committee of the Colorado Native Plant Society (CoNPS) appreciates this opportunity to submit thoughts on the forthcoming Colorado Parks and Wildlife (CPW) 10-Year Strategic Plan. We look forward to submitting more-detailed comments once a draft of the plan is published.

The passage of HB 24-1117, giving CPW the authority and responsibility to protect rare plants and invertebrates, marks a watershed in Colorado's regulatory stance toward native plants. During the next ten years, the goal should be to thoroughly operationalize this authority to make clear and tangible gains in preserving and advancing the status of native plants in Colorado. Due to the continuing threats to rare plants and their pollinators, and to native ecosystems, CPW must commit to giving native plants and their pollinators, as well as other invertebrates, the same level of consideration that deer and elk get now.

Threats to Colorado's native plants and their habitats are at an all-time high. Colorado is one of the fastest growing states in the US. Demands for housing, energy, recreation and transportation are placing unprecedented pressure on native plants and natural ecosystems even as climate change alters precipitation regimes and the timing of plant flowering and insect emergence, among other things.

CoNPS stands ready to assist CPW in fulfilling your responsibilities to protect and promote rare plants and we look forward to developing a close working relationship with you all to further the conservation of native plants and ecosystems.<sup>1</sup>

## **Partnership**

We envision a future in which the Department of Natural Resources (DNR) and Colorado Parks and Wildlife works closely with us, and organizations similar to ours, to protect and enhance rare plants and native ecosystems.

For example, we have the people and expertise to partner with CPW to conduct bioblitzes on DNR land, helping the Department understand what the floral resources are on their properties. Through our chapters, we have the people and expertise to work locally with an enhanced CPW volunteer program to mitigate non-native invasive species on DNR properties and to provide public education regarding native plants. We have the subject matter expertise to assist the DNR legislative personnel in drafting scientifically-informed bills which address native plants, pollinators, and biodiversity. We have people with a wealth of backgrounds in natural resource management which could help inform CPW policies, comments, and actions.

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<sup>1</sup> Since this is a CPW Strategic Plan, not a DNR plan, our comments focus on CPW. However, we hope that all units of DNR, including the State Land Board, the Energy and Carbon Management Commission (ECMC), and the Division of Reclamation, Mining, and Safety, would have similarly-consistent goals and objectives as CPW with respect to native plants. Inconsistency across DNR divisions does not facilitate conservation as effectively as it could and should.

## Conservation

We envision a future in which DNR/CPW is the foremost voice for conservation of rare plants, invertebrates, and native ecosystems in Colorado government.

We recommend that DNR/CPW build on SB24-1117 to champion legislation to enable rare plants and invertebrates to be added to the state threatened and endangered species lists, especially in light of the federal government's recent moves to undermine the Endangered Species Act.

We envision a future in which CPW, in partnership with the Colorado Natural Heritage Program (CNHP), advocates for the increased use of CNHP 'Important Plant Areas'<sup>2</sup> and CNHP 'Potential Conservation Areas'<sup>3</sup> – internally to guide agency action, and externally to get other units of government to do so, as well – so that the best science is used to guide CPW decision-making and priorities. The use of these two tools could constitute for plants what 'High Priority Habitats' do, or should do, for big game and endangered birds and fish.

We envision a future in which CPW uses Botanical Niche Models developed by CNHP (see attached PowerPoint) that help streamline monitoring, research, conservation strategies and recovery plans for all plant Species of Greatest Conservation Need, both Tier 1 and Tier 2 (SWAP 2025), as well as plant Species of Greatest Information Need. It is particularly important to monitor Colorado's imperiled plant species, particularly in the face of increasing climate change.

We envision a future in which CPW's conservation actions focus not solely on individual floral species, but also on rare plant communities and ecosystems, with their associated pollinators. Individual plant species do not exist in isolation – they are part of an ecosystem, and it is the ecosystem which needs to be preserved. The individual species will be preserved then, as well.

We envision a CPW which completes the remaining recommendations in the 'Colorado Rare Plant Conservation Strategy' (2009), filling in the gaps which have yet to be addressed, some sixteen years after its publication.

We envision a CPW/DNR which has convened an interagency task force leading to legislation, to update reclamation standards across divisions, stressing that revegetation is not so much a function of mere plant cover as it is plant structure, diversity, and ecological functioning.

We envision a future in which CPW's comments on proposals before other agencies, especially ECMC, give full-throated advocacy for the preservation of rare plants and invertebrates, especially a renewed emphasis on the correct implementation of the mitigation hierarchy ('avoid, minimize, and mitigate') to prioritize avoidance rather than relying on stipulations ('minimization') and monetary payments ('mitigation') to conserve plants.

We envision a CPW which hires an outside consulting firm to assess the ecological condition of all its properties so that restoration activities can be prioritized accordingly.

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<sup>2</sup> Important Plant Areas (IPAs) have been defined as "natural or semi-natural sites exhibiting exceptional botanical richness and/or supporting an outstanding assemblage of rare, threatened, and/or endemic plant species and/or vegetation of high botanic value."

<sup>3</sup> PCA's represent CNHP's best estimate of the primary area supporting the long-term survival of targeted occurrences of rare species and plant communities and include suitable habitat and buffers from disturbance.

We envision a future in which CPW works with us and the private sector to expand the availability of native, regionally-adapted seed for revegetation efforts.

## Transparency

We envision a future where CPW/DNR's comments on federal actions are available to the public through a public-facing web page, averting the need to contact CPW/DNR public information officers or file Colorado Open Records Act (CORA) requests for the comments.

We envision a future in which the SWAP Dashboard<sup>4</sup> is updated and maintained and used to inform agency priorities.

We envision a future in which both the amount of funding and their uses from SB24-230 are clearly detailed, with a substantial portion going toward the preservation of ecosystems, after consultation with stakeholders such as ourselves. This legislation lists eight categories of investment in “remediation services which [would] partially mitigate the impacts of oil and gas operations”<sup>5</sup> - at least 6 of the 8 'remediation services' reference 'biodiversity', 'habitats', and 'native species'. This money should not all be diverted to new parks and state wildlife areas, as other funding streams are available for those endeavors.

We envision a future in which mitigation projects are vetted with all stakeholders, including us, before implementation, and in which monitoring and evaluation of the projects is done consistently according to scientific standards, so the effectiveness of the projects can be judged and improved upon.

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Thank you for your consideration of these recommendations as the strategic plan process moves forward.

Brad Klafehn, Chair, CoNPS Conservation Committee and CoNPS Board Member  
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<sup>4</sup> <https://public.tableau.com/app/profile/cpw1247/viz/ColoradoSWAPDashboard/MainDashboard?publish=yes>. The Dashboard has not been updated for over two years.

<sup>5</sup> C.R.S. 33-61-101(q)