



GMUG National Forests
Attn: Forest Plan Revision Team
2250 Highway 50
Delta, CO 81416

June 1, 2018

Re: Grand Mesa, Uncompahgre and Gunnison National Forests
Forest Plan Revision: Scoping

Dear Forest Planning Team:

Thank you for providing the opportunity to comment on the above Scoping Process. Below are comments and suggestions from the Conservation Committee of the Colorado Native Plant Society (CoNPS).

All comments and suggestions are given as they relate to the mission of the Society:

.....a non-profit organization dedicated to furthering the knowledge, appreciation and conservation of native plants and habitats of Colorado through education, stewardship and advocacy,

and to the mission of the US Forest Service:

.....to sustain the health, diversity, and productivity of the nation's forests and grasslands to meet the needs of present and future generations.

We hope to answer the major questions you have brought up in your Scoping Guide, and to also point out areas regarding native plants and habitats that are of the utmost concern to the Society and its 1,000+ members. These comments are in addition to the scoping comments provided by Rocky Smith et al dated May 24, 2018, for Timber, and June 1, 2018 for Rangeland Management and Grazing that we endorsed.

Part 1: Forest Plan Vision, Roles and Contributions:

- 1. Is this a vision that you can get behind?**
- 2. Did we capture the GMUG's unique roles and contributions with the broader landscape?**

In addition to the two proposed major roles and contributions of GMUG (public enjoyment, and commodity use and community connections), we feel that the protection of GMUG's natural resources, habitat and biodiversity should be a third contribution and role, "Sustaining the Health and Diversity of the Forest", which would correlate to the 'health and diversity' portions of the USFS Mission Statement, as stated above. This would provide more assurance that GMUG's vision for the future would include protecting ecosystems, habitat and biodiversity, and would hold the same importance and 'standing', within the text of the Scoping Document and the Revised Forest Plan, as the 'productivity, commodity use, community connections, and public enjoyment' portions of your Vision, Contribution and Roles. It is vitally important

that GMUG, as stated on page 1, “Why the GMUG Matters”, not only manages and maintains the structure, function and composition of ecosystems, but also improves, restores and protects those same ecosystems.

Thank you for including the paragraph regarding the Rocky Mountain Biological Laboratory. It is indeed a jewel for GMUG, and for the entire state.

We have a few specific comments for the section entitled, “**Commodity Use and Community Connections**”:

2nd bullet point - Timber:

It is ever so important to stipulate within this document and in the Revised Forest Plan that any timber production, harvesting, etc., must protect in a sustainable manner the biodiversity of the habitat.

4th bullet point - Energy:

The massive growth of energy production in our State, and in the GMUG is very concerning. It is important to make sure, going forward, that new energy production can be accomplished in the most sustainable manner possible, not allowing it to enter into any new areas, or areas of environmental concern.

5th bullet point – Scenery/Tourism:

The phrase “...and the growth of second home development” is concerning if GMUG is encouraging development within the Forests – it could be that some clarification, or even deletion, of that phrase is needed.

Part II – Key Needs for Change:

Do these needs for change reflect the major issues that we should concentrate on in plan revision?

One key need for change that isn’t being addressed to any degree in this document is the fiscal/budgetary difficulties the USFS is facing, as is every other government agency. We all hope this situation will improve, but in the meantime, it would be forward-thinking to have a plan in place, to provide for all these other needs for change by monitoring, boots on the ground, hiring more staff, etc. What are your alternatives if the financing isn’t there for years to come? Collaboration with other government agencies, NGO’s, local communities, citizen science projects should be a viable alternative. CoNPS is more than willing to help in this area, in any way necessary.

Although there are Forest Assessments for Invasive Plants and Carbon, there is no mention at all in this scoping document regarding invasive plants, and there is minimal content regarding climate change. Both areas need and deserve to be included as key needs for change in the Scoping Process and the Forest Plan.

Provide Strategic, Adaptive Direction: ‘Provide more strategic, adaptive direction than the often prescriptive, tactical direction in the current Forest Plan. Adaptive direction should provide for greater durability.’

An ‘adaptive’ direction versus a prescriptive direction may work for some issues, but overall, it seems vague, and possibly even harmful to the entire forest, and to every one of the key needs for change. Please keep the options open to proceed with prescriptive direction if and when necessary. The forests needs more attention, not less. Is the adaptive direction being considered because of budgetary constraints? What is the reasoning behind moving to an adaptive direction?

Additional comments for this section of the Scoping Process:

1st bullet point – Monitoring Plan:

Hopefully the updated forest plan will go into detail explaining what the adaptive components are.

...”**utilizing remote sensing technology as much as practicable,**” This is an example of where prescriptive direction would be helpful – to use on-the-ground monitoring, in addition to the remote sensing technology. Again, this is an area where collaboration should be an alternative, and mentioned in the key needs for change.

3rd bullet point - Timber: **“Consider updating plan direction to allow more flexibility as new methods and practices emerge.”** Hopefully, the new methods and practices that emerge will maintain sustainability.

Contribute to Social and Economic Sustainability:

1st bullet point: **“The recreational value and use of the GMUG has increased over the years. In many areas, recreation is a driver and should be a major consideration when Forest Plan desired conditions are developed.”** However, recreation use is not always compatible with other uses, including but not limited to preservation of wildlife corridors and protection of rare and endangered plant species. In addition, heavy recreation use can contribute to the degradation of ecosystems and the introduction and spread of invasive plants. We suggest deleting “major.”

2nd – 4th bullet points: Concerns that focus on increased trail building and new facilities could be incompatible with the stated goals of providing for ecological sustainability and maintaining diversity of plant and animal communities. This seems to directly conflict with the 2nd bullet point under **“Maintain the Diversity of Plant and Animal Communities”**.

5th bullet point – Motorized Recreation:

How will the landscape-scale strategy regarding motorized recreation activities ensure that these activities do not expand into non-target areas?

7th bullet point: Plant collection (with some exceptions, e.g., tribal communities and research) should be limited to avoid over-collection and negative impacts to native plant communities.

8th bullet point: **“Consider updated direction for the existing Gothic Research Natural Area to better facilitate ecological research.”** Thank you for including this. There is one other RNA in GMUG – the Escalante Canyon. Would that also be considered for updated direction? Will specifics of the updated direction be included within the Revised Forest Plan? It is the hope of the Colorado Native Plant Society that GMUG will in the near future designate additional research natural areas.

9th bullet point – Scenery/Scenic Byways:

In this day and age, there is an increasing need for management of quiet and dark skies. CoNPS supports GMUG in consideration of this need. Plants and animals will certainly benefit from less disruption caused by artificial lights.

Provide for Ecological Sustainability:

As we mentioned in our comment letter of January 27, 2018, the focus and direction of the forest plan regarding climate change should include increased monitoring and data collection. In connection to climate change, does the forest service currently have an adaptive management draft in place for how to respond to the increasing spruce beetle issues (ex: We are not experiencing the same extended periods of cold needed to kill them off in the winter.)?

Maintain the Diversity of Plant and Animal Communities:

As mentioned above, it is our hope that additional research natural areas will be considered within GMUG – there is such a wealth of biodiversity in the Forest at present.

Research Natural Areas (RNAs) are areas which, as the Rocky Mountain Research Station notes, "are managed to maintain the *natural* features for which they were established, and to maintain *natural* processes. Because of the emphasis on *natural* conditions, they are excellent *areas* for studying ecosystems or their component parts and for monitoring succession and other long-term ecological change...The [RNA] network protects some of the finest examples of natural ecosystems for the purposes of scientific study and education and for maintenance of biological diversity...RNAs are permanently protected and maintained in natural conditions, for the purposes of conserving biological diversity, conducting non-manipulative research and monitoring, and fostering education. Included in this network are:

- High quality examples of widespread ecosystems
- Unique ecosystems or ecological features
- Rare or sensitive species of plants and animals and their habitat"

(<https://www.fs.fed.us/rmrs/research-natural-areas>)

The Colorado Native Plant Society shares the same mission as the RNAs, has used RNAs in the past, and intends to do so in the future to educate our members and to conduct research, for example on the Gothic, Escalante Canyon, Mount Goliath, and Hoosier Ridge RNAs. Despite there being 27 RNAs in Colorado now, and 571 nationally, there are only two presently on GMUG (Gothic and Escalante Canyon on the Uncompahgre Plateau). This is a situation which certainly needs to be addressed in the Plan to bring GMUG up to parity (or beyond) with other forests. We look forward to, and wholly support, GMUG's efforts to expand the number of RNAs within the forest, as stated in the Revised Draft Assessment for Designated Areas.

CoNPS recommends that the Forest Service continue to look at the Potential Conservation Areas (PCAs) defined by the Colorado Natural Heritage Program (CNHP) for locations on the GMUG. CNHP has identified 90 such areas on the GMUG (see attachment).

If it isn't already, the Forest Service should also consider the BLM's Areas of Critical Environmental Concern (ACEC), existing Colorado Natural Areas and State Wildlife Areas, and Colorado State Land Board lands in the Stewardship Trust. For those in proximity to or contained within GMUG, an analysis should be done (if it hasn't already been done) to see if their attributes extend into FS lands, and whether that FS land warrants special protections as a result.

As also stated above, although there is a Revised Draft Forest Assessment for Invasive Plants, there's no mention in the scoping document about invasive plants, including noxious weeds.

Inclusion of *Asclepias speciosa* and *Astragalus bisulcatus* on the invasive species list is a concern to us. GMUG states, "Although native plants are on that list, they are very low priority and there is no record of them being treated. Given the importance of those plants to pollinators, any treatment would take that into consideration before taking action." Given this statement, it is our recommendation that they both be removed from the list.

Also of concern for us is the elimination of native species such as larkspur, juniper and oak, solely to manage for cattle grazing.

The assessment for invasive plants states that GMUG had over 25,000 acres of invasive plants in 2016, but also that District Range Personnel state that over 125,000 acres are actually infested. This five-fold difference in acreage is important and unexplained, and has consequences for the Forest Plan's ultimate recommendations.

The Assessment also states that invasive species infestations have grown 10% from 2005 to 2016 (based on the possibly erroneous figure of 25,000 acres), but Appendix A, Table 3 shows that Canada thistle (*Cirsium arvense*), for example, increased 3-fold during that period, as did Yellow toadflax (*Linaria vulgaris*), while Musk thistle (*Carduus nutans*) increased 4-fold. The table also shows that Common mullein (*Verbascum thapsus*) only comprises 201 acres. This seems woefully underreported. On the other hand, if Cheatgrass (*Bromus tectorum*) has been decreased 94%, that is an outstanding achievement, and the Plan should discuss in detail how this was accomplished and the costs involved.

Meanwhile, the Assessment reports that GMUG treats 2,000-3,000 acres per year, or 8%-12% of the infested acreage. However, if the acreage is really 125,000 acres, this effort should probably be expanded five-fold to 10,000-15,000 acres per year, a huge undertaking which will require large financial commitments from GMUG.

In the Terrestrial Ecosystems Assessment, we also find this statement:

"Pinyon-Juniper

Consider emphasizing management in this type to reduce fuels in the wildland-urban interface and near infrastructure, to create a more resilient landscape where fire can play a more natural role, and to maintain or improve wildlife habitat (winter range) purposes. "

Mechanical treatment may improve wildlife habitat but at the possible expense of facilitating the proliferation of cheatgrass. One recent scientific study ([Understory Responses to Mechanical Treatment of Pinyon-Juniper in Northwestern Colorado](https://www.sciencedirect.com/science/article/pii/S1550742416300318), available at:

<https://www.sciencedirect.com/science/article/pii/S1550742416300318>), which mechanically treated PJ plots in 2011, states:

"Exotic annual abundance was negligible in 2012 and remained so in control plots in 2013. However, in mechanically treated plots, exotic annuals rose substantially in 2013. Recent anecdotal reports indicate further increases, particularly of cheatgrass, across all mechanically treated plots, especially rollerchopped plots. Delayed responses of exotics to mechanical treatments have also been observed in other pinyon-juniper removal studies where exotics were not abundant before treatment (Bates et al. 2005; Owen et al. 2009; Miller et al. 2014). "

Before giving carte-blanche to conduct mechanical treatments of PJ forests, consideration should be given to the potential to worsen invasives, especially cheatgrass, in those situations.

As to plant species of special concern to CoNPS, there is a list in the GMUG Forest Assessment: Identifying and Assessing At-Risk Species (March 2018), Appendix 2. Species Initially Considered, but Removed from Consideration based on "Known to Occur" Criteria. We suggest that the FS work with CNHP during the time of Draft EIS preparation to prioritize this list and perhaps organize a bio-blitz during the summer of 2019 to document the existence, or not, of these species. CoNPS would be willing to assist with such an effort. The

general 'feel' of the scoping document is a move toward protection of species by protecting the habitat, but we hope there is acknowledgement that the need is still there to look at the fine scale, as well, for rare plants. Surveys are of the utmost importance. Many native plants are not included because they are not known from the forest within 1 or five miles. It is our recommendation, again, that surveys be accomplished for these species, and include them if they are found.

On page 7 and following in the At-Risk Species Assessment, the FS lists numerous plant species of concern. In the preparation of the draft EIS, the FS should also consult with CNHP and CoNPS to determine whether populations of those plants should be protected through RNAs or some other management stipulations. For example, there is a compact population on Grand Mesa of Rothrock's Townsend Daisy (*Townsendia rothrockii*) which is known to be vulnerable to off-road vehicle use and grazing. As the Assessment notes, the limited geographic distribution of these species, combined with expected climate change may warrant special action to protect them. For example, on p. 29, the FS writes, "Fens make up a small portion of the plan area (less than 1%), and are relatively well-mapped on the GMUG, making them practical places to implement protective measures such as cattle exclusion fencing." We commend the FS for this statement and hope to see it followed through in the Plan itself.

CONPS requests that the GMUG continue to involve us in the "revised SSC" process.

2nd bullet point – Fragmentation:

Why not maintain and restore existing unfragmented habitat not only for big game, but for ALL species of wildlife that need large blocks of land for migration, etc.? In this age of climate change, in addition to wildlife, native plants will also need unfragmented corridors for migration that are not blocked by agriculture, timber and energy production, roads, etc. Whatever is left in the 'island' of a natural habitat will become stranded with nowhere to go and will eventually die out, affecting not only our rare plants and habitats, but our common ones too.

3rd bullet point – Maintaining Rare Ecosystems:

How will the forest service approach maintaining, and even restoring, cottonwood and fen ecosystems (riparian) with the increased demand for water resulting from Colorado's growing population, and the impact of droughts resulting from future climate change?

4th bullet point – Wildlife and Livestock Conflicts:

How will the forest service approach minimizing conflicts between wildlife and livestock, considering the damaging effects of livestock grazing, particularly among species that utilize the same food (grasses, forbs)? How will the forest service ensure that plant communities are not depleted to a point that is difficult to recover?

Incorporate Best Available Science, Update to Existing Law and Policy:

It is our hope that GMUG will take full advantage of all scientific research available for every aspect of the forest plan, especially for climate change, global warming, etc., and how the changes will affect the flora and fauna in GMUG. Alternatives should be in place in the event of future negative legal and policy changes, so that the forest itself isn't impacted negatively - again collaboration is the key.

Part III – Management Area Framework:

Can GMUG provide greater detail regarding how forest-wide direction is compatible with an adaptive approach? Is it safe to assume the forest is experiencing the same conditions throughout and can be managed the same way? As we stated earlier, please keep the options open to proceed with prescriptive direction if and when necessary.

Regarding the tentative descriptions for the theme categories, in addition to 'not suitable for timber production or harvest', we recommend that additionally, 'grazing, motorized/non-motorized vehicles, energy development' are also not suitable for 'Natural Processes Dominate' and 'Special and Unique Landscapes'.

For the tentative description of 'Recreation Focus Areas/High-Use Recreation Emphasis', we recommend amending the last sentence to read: 'Vegetation management emphasis would be for public safety, scenery management **and preservation of native plant communities, including the reduction/control/elimination of invasive plants.**'

Additionally, for the tentative description of Highly Developed Areas (Non-recreation emphasis, i.e., utility corridors) we recommend amending the last sentence to read: 'Vegetation management emphasis on defensible space, fuels management, **and reducing/controlling/eliminating invasive plants from disturbed areas.**'

Thank you again for the opportunity to comment, and the time, effort and expertise the Planning Team has put forth. If you have any questions about our comments, or if there is anything the Colorado Native Plant Society can do to help GMUG in the future, please let us know.

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