

## Comments on the Cimarron and Comanche National Grasslands Land Management Plan Revision – Botany Focus

9/25/25

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Thank you for the opportunity to review the documents provided for the assessment phase of the Cimarron and Comanche National Grasslands Land Management Plan Revision. We reviewed the draft with particular emphasis on the proposed plant Species of Conservation Concern (SCC). Because we only curate data in Colorado, our comments are provided only for Colorado species and the Comanche National Grassland. We respectfully offer the following information from CNHP's database of tracked species status and location, as well as the tracking status and heritage ranks of species, as of 9/23/2025. The data below are more current than information presented on the NatureServe Explorer website. Please consider the comments provided in the following tables. Tables are also provided in the form on an excel spreadsheet via email.

Table 1. CNHP comments on the list of plant Species of Conservation Concern presented by the USFS in the draft Grassland Management Plan. This table provides up-to-date information on subnational ranks (S ranks) in Colorado, CNHP-tracking status, and number of occurrences (EOs) on the Comanche National Grassland as recorded in our database. Plant species highlighted in yellow are ranked globally critically imperiled – vulnerable (G1-G3).

Common Name	Scientific Name	G Rank	S Rank in Colorado	CNHP Tracking Status	#EOs on Comanche	Notes
Beaked Spikerush	<i>Eleocharis rostellata</i>	G5	S3	No		At this time, CNHP ranks this taxon as S3. Not considered a conservation priority by CNHP.
Bigelow's Bluegrass	<i>Poa bigelovii</i>	G5	S2	Watchlist (poorly known)		Currently considered to be in need of information. Not necessarily a conservation priority.
Black Grama	<i>Bouteloua eriopoda</i>	G5	S3	No		Not considered a conservation priority by CNHP.
Black Willow	<i>Salix nigra</i>	G5	S1	Yes	1	
Blue Three-awn Grass	<i>Aristida purpurea</i> var. <i>nealleyi</i>	G5TST5	S3	No		At this time, CNHP ranks this taxon as S3. Not considered a conservation priority by CNHP.
Buckley's Beardtongue	<i>Penstemon buckleyi</i>	G4G5	S2	Yes	2	
California Amaranth	<i>Amaranthus californicus</i>	G4	S1	Watchlist (poorly known)	0	Per SEINet, this taxon is known from NE Colorado. Currently considered to be in need of information. Not necessarily a conservation priority.
Cardinal-flower	<i>Lobelia cardinalis</i>	G5	S2	Yes	1	
Cobea Beardtongue	<i>Penstemon cobraea</i>	G4	SNA	No		This taxon is considered a waif in Colorado and not persisting (Dina Clark, retired Botany Collection Manager at University of Colorado Herbarium, pers. comm). Not considered a conservation priority by CNHP.
Colorado Gentian	<i>Frasera coloradensis</i>	G2	S2	Yes	7	
Comb-like Evening Primrose	<i>Oenothera coronopifolia</i>	G5	S4	No		At this time, CNHP ranks this taxon as S4. Not considered a conservation priority by CNHP.
Cooley's Mimosa	<i>Desmanthus cooleyi</i>	G5	S2	Yes	6	
Cutleaf Germander	<i>Teucrium laciniatum</i>	G4G5	S3	No		At this time, CNHP ranks this taxon as S3. Not considered a conservation priority by CNHP.
Dwarf Milkweed	<i>Asclepias involucrata</i>	G5	S2	Yes	3	At this time, CNHP ranks this taxon as S2.
Ear Muhly	<i>Muhlenbergia arenacea</i>	G5	S2	Yes	5	
Engelmann's Goldenweed	<i>Oonopsis engelmannii</i>	G3	S3	Yes	1	
Fendler's Three-awn Grass	<i>Aristida purpurea</i> var. <i>fendleriana</i>	G5TNR	S4	No		At this time, CNHP ranks this taxon as S4. Not considered a conservation priority by CNHP.
Flax-leaf Stenosiphon	<i>Stenosiphon linifolius</i>	G5	S1	Yes	0	CNHP currently recognizes this as <i>Oenothera glaucifolia</i> .
Fragrant Indigobush	<i>Amorpha nana</i>	G5	S2	Yes	3	
Giant Dropseed	<i>Sporobolus giganteus</i>	G5	S2	Yes	1	
Great Plains Flatsedge	<i>Cyperus lupulinus</i>	G5	S2	Watchlist (poorly known)		Currently considered to be in need of information. Not necessarily a conservation priority.
Greene Milkweed (Wheel Milkweed)	<i>Asclepias uncialis</i>	G2	S2	Yes	4	
Gummy Lovegrass	<i>Eragrostis curtipedicellata</i>	G5	S1	Yes	2	

Common Name	Scientific Name	G Rank	S Rank in Colorado	CNHP Tracking Status	#EOs on Comanche	Notes
Hartweg's Sundrops	<i>Calylophus hartwegii</i> ssp. <i>pubescens</i>	G4G5	S2	Yes	0	CNHP currently recognizes this as <i>Oenothera hartwegii</i> . We recognize that ssp. <i>pubescens</i> is the ssp. in Colorado.
Harvard's Three-awn Grass	<i>Aristida harvardii</i>	G5	S1	Yes	2	
Hoary Tansy-aster	<i>Dieteria canescens</i> var. <i>glabra</i>	G5	S4 (full species)	No		Listed in the Colorado Flora (Ackerfield 2022) and CNHP database as <i>Dieteria canescens</i> . A preliminary review of SEINet data indicates <i>D. canescens</i> var. <i>glabra</i> would rank as S4 in Colorado and therefore not be considered a conservation priority by CNHP.
Honey Mesquite	<i>Prosopis glandulosa</i> var. <i>glandulosa</i> ; <i>Prosopis glandulosa</i>	GNR	S1	Yes	0	CNHP currently recognizes this as <i>Prosopis glandulosa</i> . We recognize that var. <i>glandulosa</i> is the variety in Colorado. At this time, CNHP ranks this taxon as S1.
James' Beardtongue	<i>Penstemon jamesii</i>	G4	S1	Yes	2	
Large-bract Scurfpea	<i>Pediomelum cuspidatum</i>	G4	S1	Yes	0	
Least Duckweed	<i>Lemna minuta</i>	G5	S3	No		At this time, CNHP ranks this taxon as S3. Not considered a conservation priority by CNHP.
Longleaf Greeneyes	<i>Berlandiera lyrata</i>	G5	S3	No		At this time, CNHP ranks this taxon as S3. Not considered a conservation priority by CNHP.
Low Silverbrush	<i>Argythamnia humilis</i>	G5	S2	Yes	0	CNHP currently recognizes this as <i>Ditaxis humilis</i> .
May Grass	<i>Phalaris caroliniana</i>	G5	S1	Yes	4	
Narrowleaf Purple Coneflower	<i>Echinacea angustifolia</i>	G5	S2	Yes	2	
Neally's Dropseed	<i>Sporobolus nealleyi</i>	G5	S2	Yes	0	
New Mexico Blackberry	<i>Rubus neomexicanus</i>	G5	S1	Yes	3	
One-flower Flatsedge	<i>Cyperus retroflexus</i>	G5	Not Applicable	Not Applicable		<i>Cyperus retroflexus</i> is not recognized as a Colorado taxon by Ackerfield (2022) or BONAP. BONAP shows this as rare in SE Kansas.
Painted Milkvetch	<i>Astragalus ceramicus</i> var. <i>filifolius</i>	G5T4	S3	No		Not considered a conservation priority by CNHP.
Plains Ironweed	<i>Vernonia marginata</i>	G5?	S1	Yes	0	
Poison Suckleya	<i>Suckleya suckleyana</i>	G5	S3	No		At this time, CNHP ranks this taxon as S3. Not considered a conservation priority by CNHP.
Queen's Delight	<i>Stillingia sylvatica</i>	G5	S1	Yes	0	
Reichenbach's Hedgehog Cactus	<i>Echinocereus reichenbachii</i> var. <i>perbellus</i>	G5	S3 (full species)	No		Listed in the Colorado Flora (Ackerfield 2022) and CNHP database as <i>Echinocereus reichenbachii</i> . A preliminary review of SEINet data indicates <i>E. r. perbellus</i> would rank as S2 in Colorado based on limited data. Currently considered to be in need of information. Not necessarily a conservation priority.
Running Fleabane	<i>Erigeron flagellaris</i>	G5	S4	No		Not considered a conservation priority by CNHP.
Sandsage Prairie Clover	<i>Dalea cylindriceps</i>	G3	S3	Yes	4	At this time, CNHP ranks this taxon as S3.
Shortbeak Arrowhead	<i>Sagittaria brevirostra</i>	G5	S2	Yes	1	At this time, CNHP ranks this taxon as S2.
Southwestern Cloak Fern	<i>Astrolepis integerrima</i>	G5	S1	Yes	1	
Springfield Bluestem	<i>Bothriochloa springfieldii</i>	G5	S1	Yes	6	At this time, CNHP ranks this taxon as S2.
Texas Bergia	<i>Bergia texana</i>	G5	S2	Yes	1	

Common Name	Scientific Name	G Rank	S Rank in Colorado	CNHP Tracking Status	#EOs on Comanche	Notes
Toad Rush	<i>Juncus bufonius</i>	G5	S4	No		Not considered a conservation priority by CNHP.
Trailing Ratany	<i>Krameria lanceolata</i>	G5	S2	Yes	5	
Woolly Prairie-Clover	<i>Dalea lanata</i>	G5	S2	Yes	0	
Wright's Goldenrod	<i>Solidago wrightii</i>	G4	S2	Yes	6	

Table 2. CNHP-tracked species represented in the CNHP database with element occurrences (EOs) on the Comanche National Grassland. These species were not included in the list of plant Species of Conservation Concern presented by the USFS for the draft Grassland Management Plan. Plant species highlighted in yellow are ranked globally critically imperiled – vulnerable (G1-G3).

Common Name	Scientific Name	G Rank	S Rank in Colorado	CNHP Tracking Status	#EOs on Comanche	Notes
Hoary Mallow	<i>Abutilon incanum</i>	G5?	S1	Yes	1	
Drummond's Onion	<i>Allium drummondii</i>	G5	S1	Yes	1	
Arizona Three-awn Grass	<i>Aristida arizonica</i>	G4	S1	Yes	2	
Wright's Three-awn Grass	<i>Aristida purpurea</i> var. <i>wrightii</i>	G5TNR	S1	Yes	3	
Long-hood Milkweed	<i>Asclepias macrotis</i>	G4	S2	Yes	1	
Ebony Spleenwort	<i>Asplenium platyneuron</i>	G5	S2	Yes	4	
Black-stemmed Spleenwort	<i>Asplenium resiliens</i>	G5	S1	Yes	2	
Trinidad Milkvetch	<i>Astragalus puniceus</i> var. <i>puniceus</i>	G4T3?Q	S2	Yes	1	
Cane Bluestem	<i>Bothriochloa barbinodis</i>	G5	S1	Yes	1	
Sandhill Goosefoot	<i>Chenopodium cycloides</i>	G3G4	S2	Yes	0	No EOs on Comanche but known from adjacent land. USFS Region 2 sensitive.
Slender Flatsedge	<i>Cyperus bipartitus</i>	G5	S2	Yes	2	
Featherplume Dalea	<i>Dalea formosa</i>	G5	S2	Yes	3	
Dwarf Dalea	<i>Dalea nana</i> var. <i>nana</i>	G5TNR	S2	Yes	3	
California Crabgrass	<i>Digitaria californica</i>	G5	S2	Yes	1	
Western Witchgrass	<i>Digitaria pubiflora</i>	GNR	S1	Yes	2	
Low Silverbush	<i>Ditaxis humilis</i>	G5	S2	Yes	1	
Tall Silverbush	<i>Ditaxis mercurialina</i>	G5	S2	Yes	3	
Twinevine	<i>Funastrum crispum</i>	G4G5	S2	Yes	3	
Carrot-leaf Desert-parsley	<i>Lomatium foeniculaceum</i> ssp. <i>foeniculaceum</i>	G5T5	S2	Yes	3	
Pink Mimosa	<i>Mimosa borealis</i>	G5	S2	Yes	5	
Nuttall's Sensitive-briar	<i>Mimosa nuttallii</i>	G5T5	S1	Yes	1	
Western Sensitive-briar	<i>Mimosa rupertiana</i>	G5T4T5	S1	Yes	1	
Wooton's Lip Fern	<i>Myriopteris wootonii</i>	G5	S2	Yes	2	
Standley's Cloak Fern	<i>Notholaena standleyi</i>	G4	S2	Yes	1	
High-plains Beeblossom	<i>Oenothera cinerea</i>	G5	S2	Yes	5	
Arkansas Valley Evening Primrose	<i>Oenothera harringtonii</i>	G3	S3	Yes	9	
Hartweg's Sundrops	<i>Oenothera hartwegii</i>	G4G5	S2	Yes	1	
Rayless Goldenweed	<i>Oonopsis monocephala</i>	G4T3	S3	Yes	1	
Hall's Panicgrass	<i>Panicum hallii</i> var. <i>hallii</i>	G5T3T5	S2	Yes	4	
Wright's Cliff-brake	<i>Pellaea wrightiana</i>	G5	S2	Yes	4	
Variable-color Beardtongue	<i>Penstemon versicolor</i>	GNRT3	S3	Yes	2	
Rocky Mountain Bladderpod	<i>Physaria calcicola</i>	G3	S3	Yes	1	
Dwarf Purslane	<i>Portulaca halimoides</i>	G5	S1	Yes	1	
Sandhill Plum	<i>Prunus angustifolia</i>	G5	S2	Yes	1	
Soapberry	<i>Sapindus drummondii</i>	G5T5	S2	Yes	7	

Common Name	Scientific Name	G Rank	S Rank in Colorado	CNHP Tracking Status	#EOs on Comanche	Notes
Capulin Goldenrod	<i>Solidago capulinensis</i>	G2	S1	Yes	1	
Fanleaf Vervain	<i>Verbena plicata</i>	G5	S1	Yes	2	
Spanish Bayonet	<i>Yucca neomexicana</i>	G4G5TNR	S1	Yes	1	

Table 3. CNHP-Tracked species known from the area of the Comanche National Grassland, but without any element occurrences known from the grassland. These are species that may be of interest to the USFS for this management unit.

Common Name	Scientific Name	G Rank	S Rank in Colorado	CNHP Tracking Status
Southern Maidenhair Fern	<i>Adiantum capillus-veneris</i>	G5	S2	Yes
Trailing Windmills	<i>Allionia incarnata</i>	G5	S2	Yes
Zizotes Milkweed	<i>Asclepias oenotheroides</i>	G4G5	S1	Yes
Platte River Milkvetch	<i>Astragalus plattensis</i>	G5	S2	Yes
Giant Reedgrass	<i>Calamovilfa gigantea</i>	G5	S2	Yes
Rusby's Flatsedge	<i>Cyperus sphaerolepis</i>	G3G5	S1	Yes
Green Sprangletop	<i>Disakisperma dubia</i>	G5	S1	Yes
Square-seed Spurge	<i>Euphorbia exstipulata</i>	G5	S1	Yes
Texas Greasebush	<i>Glossopetalon spinescens</i> var. <i>planitierum</i>	G4	S2	Yes
False Goldenweed	<i>Grindelia ciliata</i>	G4G5	S1	Yes
Dense Cottonflower	<i>Guilleminea densa</i>	G5	S1	Yes
Small-head Sneezeweed	<i>Helenium microcephalum</i> var. <i>microcephalum</i>	G5?T4T5	S1	Yes
Longleaf False Goldeneye	<i>Heliomeris longifolia</i>	G4G5	S1	Yes
Bailey's Rabbitbrush	<i>Lorandersonia baileyi</i>	G5T5	S2	Yes
Porter's Muhly	<i>Muhlenbergia porteri</i>	G5	S2	Yes
Texas Beargrass	<i>Nolina texana</i>	GNR	S1	Yes
False Gaura	<i>Oenothera glaucifolia</i>	G5	S2	Yes
Smooth Cliff-brake	<i>Pellaea glabella</i> ssp. <i>simplex</i>	G5T4?	S2	Yes
Oklahoma Plum	<i>Prunus gracilis</i>	G4G5	S1	Yes
Creek Plum	<i>Prunus rivularis</i>	G4	S1	Yes
Grassleaf Arrowhead	<i>Sagittaria graminea</i> var. <i>graminea</i>	G5T5	S1	Yes
Texas Dropseed	<i>Sporobolus texanus</i>	G5	S2	Yes
Prairie Violet	<i>Viola pedatifida</i>	G5	S2	Yes