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Title:

Comments: Dear GMUG personnel,

Please consider the following information for your GMUG Plan Revision:

- 1. I think that the GMUG is on the right track 75% of the time. I feel there is room for improvement in Botany and fen/wetland management.
- 2. What could be improved? In the past there has been 1 2 Botanists on the Forest. At present there are no certified Botanists doing plant surveys for projects, sitting in on ID teams, and writing Botany BE's/doing the Botany NEPA work. Rare plants, Botanical Special Interest Areas, and wetlands are in the back of the "refrigerator" where they are only occasionally used/brought up when a project arises.
- 3. Despite Botanical Special Interest Area designation, R2 fen and ground water guidance, and a Watershed Conservation Practices HB, fens are still being impacted on the GMUG. In 2015 the Gunnison RD District Ranger had a ditch extended into the Mt Emmons Iron Fen (see photo). In 2017 a trail maintenance contractor on Grand Mesa (GM) pushed sediment into the Dragon Fen (see photo). The Hobbs Fen (Gunnison RD) has been impacted from livestock grazing from at least 2011 2017. An opportunity was lost this year for mitigation by Federal Highways to build a fence around the site. The Union Park Fen has also been impacted by livestock for years. McCullough Fen has been driven through at least twice in the last 6 years. Cooper's Fen (GM) still has snow compaction from a snowcat driving through it. The Wager Gulch Fen has impacts from county road maintenance pushing sediment into it. A fen above Bear Gulch (Ouray RD) has a headcut moving up into the fen. High priority fens on the GMUG = Mt Emmons Iron Fen, Ironton Park Iron Fen (Ouray), Coyote Fen (GM), McCullough Fen (GM), Cottonwood Pass Fen (Gunnison), BotCot Fen (Gunnison), Hobbs Fen (Gunnison), Overland Fen (Paonia?), and the Wager Gulch Fen (Gunnison).
- 4. Please include the following plants on your Species of Concern list: Botrychium paradoxum (1 location on GMUG), Carex livida (2 locations on GMUG), Eriophorum gracile (3 locations on GMUG), Eriophorum altaicum (1 location on GMUG), Kobresia simpliciuscula (1 location on GMUG Hobbs Fen), Trichophorum pumilum (2 locations on GMUG).
- 5. Questions: Is there any impacts occurring in fens in the Ward Lake TS? Is there any impacts on rare plants occurring in alpine areas of the GMUG with sheep grazing?

Gay Austin