

Data Submitted (UTC 11): 11/6/2021 11:00:00 AM

First name: Peggy

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Organization:

Title:

Comments: Thank you for the opportunity to comment on the revised forest plan. I have lived in Ridgway, CO for nearly 40 years, surrounded by the beautiful GMUG forest. I have especially enjoyed and care about the native plants of the area, and am passionate about seeing them protected. As the retired western slope botanist for the Colorado Natural Heritage Program and a long-time member of the Colorado Native Plant Society, my particular interest is in preserving plant species that are imperiled or vulnerable.

I have reviewed the draft plan, and am pleased to see that G/T1 and G/T2 species are designated as Species of Conservation Concern. As you will see in the attached document, I believe that a number of other plant species should be designated. In addition, I believe that the GMUG needs to update records of at-risk species. Of the element occurrences of species tracked by CNHP known to occur on the GMUG, 60% are ranked "Historical"(more than 20 years old). Updated information on these populations is necessary to determine their current existence, condition, threats and management needs. I propose a standard as follows:

"Within two years the forest will conduct or sponsor on-the-ground surveys to update records of historical element occurrences of G/T1 and G/T2 plant species on the GMUG. Within five years, the forest will conduct or sponsor surveys to update historical occurrences of G3, S1 and S2 plant species, including but not limited to species designated as Species of Conservation Concern (SCC)."

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Comments to GMUG regarding SCC Plants (draft) GMUG

Submitted to GMUG NF for Plan Revision comments

Botanist Peggy Lyon, CNHP Botanist, Colorado Native Plant Society, Education Leader Great Old Broads for Wilderness, Northern San Juan Broad Band

Gay Austin, Retired Botanist and Rangeland Management Specialist with USDA Forest Service & BLM, Colorado Native Plant Society

Thank you for the opportunity to comment on the revised GMUG plan. We are submitting comments regarding the designation of plant species as Species of Conservation Concern (SCC).

First, we are pleased that climate change is recognized among the threats for many species. We agree that a warming drying trend may threaten alpine, wetland, and fen species.

We also appreciate that CNHP data has been consulted as one of the best available scientific resources. We hope that discrepancies between FS and CNHP data can be resolved by an exchange of information. Also that the historical element occurrences (more than 20 years old), which account for 60% of the CNHP records for the GMUG can be updated, so that the best scientific information can be accessed.

However, we believe that many species deserving to be designated as SCC are left out.

Although we understand that the ecological systems where these species occur are addressed by the plan, we believe that in the case of plants, where individuals or populations are unable to move like animals, a "fine filter" is needed as well as the "coarse filter" of protecting habitat.

Table 51 of Appendix 9 lists species to be designated as SCC, including G1 and G2 species. Two important G/T2 species listed below are missing from that list. Chapter 10 of the Planning Handbook "directs that G1G2 species are expected to be species of conservation concern unless there is evidence that the known threats do not operate in the planning unit".

*Draba exunguiculata* (G2 S2) 3 documented occurrences on boundary of Gunnison and San Isabel NF. Both forests need to take responsibility for this species. Threats - climate change, domestic sheep grazing.

*Physaria rollinsii* (G1G2 S1S2) 13 documented occurrences along HPP transects on Gunnison RD (HPP transects, Austin pers. comm.) [Austin, G. 2021. Personal communication - HPP transects documented by Barry Johnston of transects with 41 locations of *Physaria rollinsii*. Unpublished document. Gunnison Ranger District, Gunnison, CO.]

Threats - livestock grazing, increasing off-trail ORV use, planned recreation development occurring in habitat northeast of Gunnison, increased off-leash dog use in habitat, climate change drying in lower elevations, spread of cheatgrass,

Table 53 of Appendix 9 lists species that should be considered but were determined not to be eligible according to the 4 criteria that are listed in the draft plan revision. Appendix 9 states that to be designated as SCC all four criteria listed must be met. However, the planning rule only requires that one or more of these criteria be met.

"f. Species for which the best available scientific information indicates there is local conservation concern about the species' capability to persist over the long-term in the plan area due to:

(1) Significant threats, caused by stressors on and off the plan area, to populations or the ecological conditions they depend upon (habitat). These threats include climate change.

(2) Declining trends in populations or habitat in the plan area.

(3) Restricted ranges (with corresponding narrow endemics, disjunct populations, or species at the edge of their range).

(4) Low population numbers or restricted ecological conditions (habitat) within the plan area." (Forest Service Planning Directives 12.52c - Criteria for Identifying a Species of Conservation Concern)

The second of these criteria, that there must be a "declining trend in populations or habitat in the plan area" is seldom met, since there are no data supporting either declining or increasing trends on nearly all plant species considered. If this requirement were changed to "declining trend or no data" many more of the species considered would qualify as Species of Conservation Concern, even if all four criteria were required.

In addition, items a through e in the handbook were not considered for many species. Several species that were not designated are Sensitive Species for Region 2 or on adjoining forests; or were identified by the state of Colorado as being at risk (SWAP).

The following 5 species are on the Region 2 Sensitive Species list. We understand that the Region 2 Sensitive Species list has different criteria than the GMUG SCC criteria, yet some of these species meet both criteria. No justification has been given for not including them, and we believe they should be considered according to criteria d. See our Table 53 comments and criteria met.

*Botrychium paradoxum* (G3G4 S1)

*Braya glabella* subsp. *glabella* (G5T5 S1S2)

*Drosera rotundifolia* (G5 S2)

*Carex diandra* (G5 S2)

*Carex stenoptila* (G3 S3)

The following 3 species are included in the SWAP (Colorado State Wildlife Action Plan) and should therefore be considered per criterion c.

*Carex stenoptila* (G3 S2)

*Astragalus naturitensis* (G3 S2S3)

*Cirsium perplexans* (G3 S3)

The following table was compiled with information from the GMUG in Appendix 9, Table 53 (in quotes in the table), CNHP element occurrence records [Colorado Natural Heritage Program. Element Occurrences Records. Accessed 2021. [cnhp@colostate.edu](mailto:cnhp@colostate.edu)], NatureServe Explorer and personal knowledge [NatureServe 2021. NatureServe Explorer. Online website: [explorer.natureserve.org](http://explorer.natureserve.org)].

Species from Table 53 and other species that qualify to be designated as SCC:

[TABLE EXCERPTED FOR FORMATTING REASONS]

Citations:

Austin, G. and D.J. Cooper. 2015. Persistence of high elevation fens in the southern Rocky Mountains on Grand Mesa, Colorado. U.S.A. *Wetlands Ecology and Management* 24:317-334.

Austin, G. 2021. Personal communication - HPP transects documented by Barry Johnston of transects with 41 locations of *Physaria rollinsii*. Unpublished document. Gunnison Ranger District, Gunnison, CO.

Colorado Natural Heritage Program. Element Occurrences Records. Accessed 2021. [cnhp@colostate.edu](mailto:cnhp@colostate.edu)

Colorado Parks & Wildlife - State Wildlife Action Plan

Johnston, B. 2005. Sensitive & Threatened Species (16). Unpublished document written for the GMUG. Grand Mesa, Uncompahgre & Gunnison National Forests.

NatureServe 2021. NatureServe Explorer. Online website: [explorer.natureserve.org](http://explorer.natureserve.org).

Rocky Mountain Biological Laboratory, Crested Butte, Co. Gloria Project, 2018. Wendy Brown, pers. comm.

USDA Forest Service. 2002. USDA Forest Service R2 Sensitive Species Evaluation Form, *Cladina arbuscula*. Unpublished document written for Region 2. Region 2 USDA Forest Service. Lakewood, CO.

USDA Forest Service. 2002. USDA Forest Service R2 Sensitive Species Evaluation Form, *Jungermannia rubra*. Unpublished document written for Region 2. Region 2 USDA Forest Service. Lakewood, CO.