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First name: David Last name: Inouye Organization:

Title:

Comments: The section on Invasive Plants Risk Assessment says:

"Native, invasive plants are not inventoried but do have an effect on land & Damp; livestock management. There are a number of "poison pastures" throughout the forest with dense patches of larkspur, a plant poisonous to cattle. Larkspur greens up before the grasses and if cattle are turned out too early and eat enough of it, they die. Range Specialists work with the ranchers to go into those pastures later in the season to avoid that. On some so-called poison pastures, sheep will be used to graze off the larkspur before cattle enter the area, as sheep are immune to larkspur's effect."

## Please note that:

- 1) You should specify which species of Delphinium you are referring to here. I suspect D. nuttallianum, D. barbeyi, and D. occidentale.
- 2) These three species are important floral resources for pollinators, including multiple species of native bumble bees, and migratory hummingbirds of at least two species, and possibly as many as four.
- 3) One of the bumble bees that uses these flowers is Bombus occidentalis, which is listed as a Regional Forester's Sensitive Species in at least one Region (2).
- 4) 4) Given their importance for these multiple pollinator species, including one (Bombus occidentalis) that is listed on the IUCN Red List, I don't think that Delphinium species should be targeted for removal for the benefit of an introduced herbivore species (cows). Ranchers can manage for larkspur poisoning by keeping cattle out of the "poison pastures" until later in the flowering season (I've been told by Bill Trampe, a local rancher in Gunnison County).

Note also that genus and species names should be italicized in the report.

Dr. David W. Inouye, Rocky Mountain Biological Laboratory and Professor Emeritus, Department of Biology, University of Maryland