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Organization:

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Comments: FW: Invasive Species comments

(Received after assessment comment cutoff)

From: Lyon, Peggy [mailto:Peggy.LYON@colostate.edu]

Sent: Tuesday, December 12, 2017 9:19 AM

To: Staley, Samantha J -FS <samanthajstaley@fs.fed.us>

Cc: Northern San Juan Broadband <northernsanjuanbroadband@gmail.com>

Subject: Invasive Species comments

Hi, Samantha--

I'd like to make a few comments on the Invasive Species section of the proposed GMUG plan.

Notes re GMUG Invasive Species plan

Peggy Lyon

11-10-17

1. The report notes that areas with high species richness are less vulnerable to invasive species. One of the greatest threats to richness and diversity of native species on the GMUG is the seeding that has been done by government agencies, especially smooth brome (*Bromus inermis*), crested wheatgrass (*Agropyrum cristatum*) and yellow sweet clover (*Melilotus officinalis*). Although not everyone considers these species invasive, they are at least persistent and displace native plant communities with a negative impact on biodiversity. The forest should replace them with native species when possible.

2. Re-seeding of disturbed areas, e.g. after fires or road building, should be confined to native species.

3. It is good that the plan recognizes that climate change will have a significant impact on invasive species. Since climate change is likely to result in invasive species moving up in elevation, attention should be paid to species that are now problems on BLM lands adjacent to the forest, and the agencies should cooperate to control these species, even if not currently present on the forest.

4. Why are *Asclepias speciosa* (showy milkweed) and *Astragalus bisulcatus*, both native plants, listed as invasive species? *Asclepias*, especially, should be protected and encouraged, as the host plant of the declining Monarch butterfly.

5. Eliminating native species such as larkspur, juniper and oak is not an appropriate responsibility of the forest service. Managing for cattle grazing should not extend to destruction of native vegetation to provide more forage for livestock.