

Data Submitted (UTC 11): 10/12/2021 4:43:11 PM

First name: Peggy

Last name: Lyon

Organization:

Title:

Comments: Thank you for the opportunity to comment on the draft revised forest plan. As a recently retired botanist with Colorado Natural Heritage Program at CSU, and a long-time member of the Colorado Native Plant Society, my primary concern is in protecting rare and vulnerable plant species. After reviewing Table 53 in Appendix 9 of the plan, I have several concerns. First, I am glad to see that climate change is recognized as a threat to many species. Of the four criteria listed to determine whether a species should be designated as an SCC, numbers 1, 3 and 4 are reasonable. Number 2, that there needs to be evidence of declining population is unreasonable because there is no data available on trend for most species. If criteria number 2 were eliminated, or changed to declining population or no data, then nearly half the species listed in Table 53 would qualify as SCC. I would welcome the opportunity to discuss this in detail with the person(s) who created Table 53.