

Data Submitted (UTC 11): 11/8/2021 9:48:52 PM

First name: Judith

Last name: Lopez

Organization: 700779087

Title:

Comments: I want to thank you for the chance to comment on the revised GMUG plan. I am submitting comments regarding Species of Conservation Concern, particularly the designation of plant species, although some of the same concerns apply to other wildlife.

I hike or more accurately saunter on many western slope areas but most often on Grand Mesa and the Adobe Badlands but also in Ouray County. I am a citizen science buff, a naturalist with a camera that records all kinds of life and documents it on iNaturalist.org. As a member of both Great Old Broads and Sierra Club I am involved with others who also care about the protection of our natural environment. My goal is the preservation of our native plants and animals, particularly in the face of climate change which threatens us all. Our forests and their varied habitats require our best efforts to preserve them for the lives that occupy and use them as well as those of us who benefit from them recreationally and spiritually. I am pleased to see that the plan does show concern for the impact of climate change.

Our Wildlife Management Areas must be maintained but strengthened. In regard to plant species climate change must be recognized for the threat it presents, particularly with drying trends impacting alpine, wetland, and fen species. I am concerned that many plant species were not considered because it was stated that to be designated as SCC all four criteria (listed under f of Forest Service Hand 1909.12 , Chapter 10, page 38) must be met. However, the planning rule is not this stringent and only requires that one or more of the criteria be met. Consequently this requirement has lead to plants of concern not being included. In addition, this adherence to requiring all four criteria be met has lead to a discrepancy between adjoining Forests (i.e these species differ on their inclusion or not on Sensitive species list: Botrychium paradoxum, Braya glabella, Drosera rotundifolia, Carex diandra...). The draft plan, however, gives no justification for the omission of species from one Forest to the next. While I am not a professional botanist, my understanding is that professional botanists believe that these species should be considered as species of conservation concerns and we should not have these differences across adjoining National Forest Systems areas. We really don't have good information on "declining trends in populations or habitats in the plan area". So requiring this decline be documented is requiring more data than currently available. I have found for example, there are few other citizen scientists even documenting plant and animal life in Delta County. We cannot require this standard be met if the data required aren't available.