



## CENTER FOR NATIVE ECOSYSTEMS

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Mr. Husband and the Little Snake RMP Planning Team:

Center for Native Ecosystems is pleased to nominate several Areas of Critical Environmental Concern (ACECs) for designation in the forthcoming Resource Management Plan for the Little Snake Field Office. The Resource Management Plan revision process provides an excellent opportunity to take stock of the natural values in the Resource Area and provide appropriate management to protect and preserve those values. In that spirit, we urge you to carefully consider the evidence enclosed here in determining locations in the Resource Area that should be designated as ACECs. We reserve the right to supplement these nominations at a later date with more specific information if and when such material is available.

In making our nominations, we must also note with some frustration the short and unclear deadlines BLM gave for submitting ACEC nominations. We are concerned that the changing deadlines for nomination submission and the unclear relationship between ACEC nominations and comments on the Citizens Wilderness Proposal may have confounded some efforts by the public to inform the planning process. The enclosed materials provide more than adequate explanation of the relevance, importance, and need for special management for each of the ACECs nominated. Nonetheless, we feel the public, including organizations such as ours, is better able to inform the Resource Management Planning process when given appropriate timeframes for response.

We hereby nominate all of the areas that coincide with Bureau of Land Management land which have been proposed as Potential Conservation Areas by the Colorado Natural Heritage Program. These areas have been identified for their biodiversity significance and thus encompass the most important places in the Resource Area for preserving and promoting native diversity and the health of native plant communities. The descriptions of the Potential Conservation Areas attached provide explanations of the relevance, importance, and need for special management for each of the ACECs nominated. For mapping data related to these Potential Conservation Areas, please see the Colorado Natural Heritage Program's website at <http://www.cnhp.colostate.edu/gis.html>.

In addition to nominating the Colorado Natural Heritage Program's Potential Conservation Areas, we also wish to specifically urge the protection of all lek sites for both the greater sage grouse and Columbian sharp-tailed grouse. Many of these lek sites would be protected through the adoption of the Potential Conservation Areas as ACECs, but given the highly imperiled status of both of these birds, all of the sites vital to their reproduction should be preserved. Protecting lek sites for both species through the adoption of ACECs would provide significant aid to two native birds that have been recently proposed for Endangered Species Act protection while also preserving unique and important segments of the sage brush landscape of the Little Snake Field Office. Please refer to the petitions for Endangered Species Act listing for both species we enclosed in our package of AMS information in December of 2004 for more information regarding the relevance, importance, and need for special management for these lek sites.

Finally, we wish to remind you of our outstanding nomination of several ACECs designed to protect white-tailed prairie dog colonies. This nomination includes an ACEC for the Little Snake colony in the Vermillion Basin area. This nomination was originally submitted in 2003 and was resent to you with our package of AMS information in December of 2004. As of now, we consider this nomination to be already eligible for active consideration, but please contact us if you need an additional copy to be submitted specifically as part of this phase of the Resource Management Plan revision process.

Thank you for the opportunity to present you with information we believe to be not only relevant but important to the preservation of natural values and native communities in the Little Snake Field Office. These areas deserve special management because they represent the most diverse and abundant collections of native species and even rare and imperiled ones. Many of these species are too sensitive to disturbance by oil and gas drilling, cross-country off-road vehicle riding, and livestock trampling to expect them to persist in adequate numbers without special management that would limit or otherwise mitigate the impacts of these types of activities.

We appreciate your consideration of our nominations, and we look forward to continuing to work with you and the rest of the Little Snake staff throughout the Resource Management Plan revision process. Please contact us if you have any questions regarding the information enclosed.

Sincerely,

Joshua Pollock  
Conservation Director