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Nominations for the Designation of Areas of Critical Environmental Concern for 25 Large White-tailed Prairie Dog Complexes 21 January 2003

Nominations

Center for Native Ecosystems, Biodiversity Conservation Alliance, Southern Utah Wilderness Alliance, American Lands Alliance, Forest Guardians, Sinapu, and Terry Tempest Williams hereby submit the following formal nominations for certain white-tailed prairie dog complexes to be designated as Areas of Critical Environmental Concern (ACECs). In total we are nominating 25 large white-tailed prairie dog complexes for protection as ACECs. These 25 complexes are nominated to the respective Field Office where they are found and to each of the appropriate Field Managers who manage these 25 complexes; specifically:

- the Little Snake and White River Field Managers of the Colorado office of the Bureau of Land Management;
- the Moab, Price, and Vernal Field Managers of the Utah office of the Bureau of Land Management; and
- the Cody, Kemmerer, Lander, Pinedale, Rawlins, Rock Springs, and Worland Field Managers of the Wyoming office of the Bureau of Land Management.

A list of the 25 nominated complexes follows (Table 1).

ACEC boundaries should include a half-mile buffer surrounding the complex, and complexes should be delineated using methods found in Biggins *et al.* (1993) with the clarification that both active and inactive colonies¹ should be used in circumscribing a complex. Total complex size should be calculated without regard to land ownership status. When the complex consists of multiple land ownerships, all portions of the complex and buffer zones on Bureau of Land Management (BLM) land should be designated as an ACEC.

¹ Inactive colonies are those with white-tailed prairie dog burrow systems but no remaining prairie dogs.

Table 1: White-tailed prairie dog complexes nominated for ACEC designation.

Complex/Subcomplex²	Field Office	State
Little Snake Complex	Little Snake	CO
Coal Oil Basin Complex	White River	CO
Coyote Basin (CO) Subcomplex	White River	CO
Wolf Creek Complex	White River	CO
Cisco Complex	Moab	UT
Castle Valley Complex	Price	UT
Coyote Basin (UT) Subcomplex	Vernal	UT
Kennedy Wash Subcomplex	Vernal	UT
Myton Bench Complex	Vernal	UT
Shiner Subcomplex	Vernal	UT
Snake John Subcomplex	Vernal	UT
Meeteetse Complex	Cody	WY
Polecat Bench Complex	Cody	WY
Carter Complex	Kemmerer	WY
Cumberland Complex	Kemmerer	WY
Moxa Complex	Kemmerer	WY
Pathfinder Complex	Lander/Rawlins	WY
Big Piney Complex	Pinedale	WY
Bolton Ranch Complex	Rawlins	WY
Dad Complex	Rawlins	WY
Saratoga Complex	Rawlins	WY
Seminole Complex	Rawlins	WY
Shamrock Hills Complex	Rawlins	WY
Shirley Basin/Medicine Bow Complex	Rawlins	WY
Baxter Basin Complex	Rock Springs	WY
Flaming Gorge Complex	Rock Springs	WY
Kinney Rim Complex	Rock Springs	WY
Fifteen-mile Complex	Worland	WY
Manderson Complex	Worland	WY

² Each of the subcomplexes on this table is considered part of the Coyote Basin Complex.

I. Background

The white-tailed prairie dog (*Cynomys leucurus*), one of five prairie dog species found in North America, occurs throughout the sage-steppe basins of Wyoming, northwestern Colorado, northeastern Utah, and Carbon County, Montana³ (Merriam 1890; Hollister 1916; Clark *et al.* 1971; Pizzimenti 1975; Pizzimenti 1976a, b; Hall 1981). Today this species occupies only an estimated eight percent of the area it once inhabited, and most of this is on BLM land (Center for Native Ecosystems *et al.* 2002). For example, the Gap Analysis Project's⁴ species habitat model predicts that 44% of white-tailed prairie dog habitat in Colorado is managed by the BLM, while another 44% is private land. Clearly, the BLM's management of this species will be crucial in determining whether white-tailed prairie dog populations continue to decline or begin to recover. Large white-tailed prairie dog complexes meet the relevance, importance, and special management attention criteria for ACECs, and providing these areas with protective designation will be an important first step in curtailing habitat fragmentation in large complexes and securing refuges for recovery on BLM lands. The white-tailed prairie dog is a keystone species (Kotliar *et al.* 1999; Kotliar 2000), and by acting to conserve this species and its habitat the BLM will also provide much-needed protections to other Threatened, Endangered, and BLM Sensitive species that depend on white-tailed prairie dogs and the habitat they create, such as the black-footed ferret (Campbell *et al.* 1987; U.S. Fish and Wildlife Service 1988; Clark 1989; Miller *et al.* 1996; Kotliar *et al.* 1999), mountain plover (Utah Division of Wildlife Resources 1998; Bennett 2001; Manning and White 2001a, b), burrowing owl (Martin 1983; Utah Division of Wildlife Resources 1998; Kotliar *et al.* 1999), and ferruginous hawk (Orabona and Anderson 1986; Utah Division of Wildlife Resources 1998; Seery and Matiatos 2000).

II. Nominators

Center for Native Ecosystems (CNE) is a non-profit advocacy organization dedicated to conserving and recovering native and naturally functioning ecosystems in the Greater Southern Rockies and Plains. We value the clean water, fresh air, healthy communities, sources of food and medicine, and recreational opportunities provided by native biological diversity. We also passionately believe that all species and their natural communities have the right to exist and thrive. CNE uses the best available science to forward its mission through participation in policy, administrative processes, legal action, public outreach and organizing, and education. With others, CNE formally petitioned the Fish and Wildlife Service in July of 2002 to list the white-tailed prairie dog as Threatened or Endangered under the Endangered Species Act (ESA), and has submitted comments on projects that would affect white-tailed prairie dogs to the BLM and other agencies.

Biodiversity Conservation Alliance is a non-profit advocacy group dedicated to protecting native species and their habitats in Wyoming and surrounding states. Our primary

³ Please see our listing petition for more information on the status, ecology, and biology of the white-tailed prairie dog. Center for Native Ecosystems, Biodiversity Conservation Alliance, Southern Utah Wilderness Alliance, American Lands Alliance, Forest Guardians, Terry Tempest Williams, Ecology Center, and Sinapu. 2002. Petition for a Rule to List the White-Tailed Prairie Dog (Sciuridae: *Cynomys leucurus*) as Threatened or Endangered under the Endangered Species Act, 16 U.S.C. § 1531 *et seq.* (1973 as Amended) and for the designation of Critical Habitat. 11 July 2002. Center for Native Ecosystems, Paonia. 363 pp. Available at: <http://www.nativeecosystems.org/press/020711.htm>

⁴ The Gap Analysis Project was initiated by the U.S. Geological Survey to identify conservation gaps.

mission is to protect native biodiversity and wild places, primarily on public lands. This group believes that the needs of native ecosystems should be the primary driving force behind land management decisions, and that no action should be taken that threatens the viability of native plant and animal populations. Biodiversity Conservation Alliance uses its scientific, technical, and legal resources to push for ecologically sound land management decisions and to increase public awareness of the importance of native species and ecosystems.

Southern Utah Wilderness Alliance (SUWA) is a Utah non-profit corporation with approximately 15,000 members, dedicated to the sensible management of all public lands within the State of Utah, including the preservation and expansion of wilderness. SUWA promotes local and national recognition of the Colorado Plateau's unique character, including its endemic flora and fauna, through public education and outreach, scientific research, and advocacy efforts. SUWA's members are interested in the wildlife resources that are managed by the Bureau of Land Management, U.S. Forest Service, and other federal and state agencies in Utah. In particular, SUWA members and staff are intensely interested and appreciate species such as the white-tailed prairie dog and the eastern Utah landscape that supports its existence.

American Lands Alliance is a national, non-profit conservation organization that works with individuals and grassroots groups to protect and restore wildlife and wildlands across a diversity of landscapes. American Lands uses a variety of communications, education, litigation and lobbying to achieve these goals. The organization is based in Washington, D.C., and has field offices located throughout the country. American Lands' core programs include the conservation of keystone species that are critical to ecosystem health. The white-tailed prairie dog is an important indicator species for mixed short-grass prairie and shrubsteppe habitat in the intermountain West. This ecosystem, like other grasslands and deserts in western North America, is relatively unknown to the general public and historically mismanaged by private landowners, and state and federal agencies. The range of the white-tailed prairie dog also overlaps the Sagebrush Sea, the focus of a major campaign by American Lands and our partners to protect and restore 150 million acres of sagebrush habitat across the West.

Forest Guardians is a non-profit environmental organization committed to protecting flora, fauna, natural processes, and native habitats in Colorado, New Mexico, Arizona, and Utah. Forest Guardians has a grasslands protection campaign, with particular focus on short-grass prairie in the southern plains and southwestern desert grasslands. Forest Guardians is interested in the conservation of species that face high levels of imperilment, especially those who play important umbrella and keystone functions within their ranges. However, Forest Guardians strives for the restoration and preservation of all naturally occurring components and processes within native ecosystems.

Sinapu, named after the Ute word for wolves, is dedicated to the restoration and protection of native carnivores and their wild habitat in the Southern Rockies and connected high plains and deserts. Sinapu is deeply concerned about recovering the white-tailed prairie dog because of the importance of this keystone species to other native carnivores, such as burrowing owls, black-footed ferrets, and a variety of eagles and hawks.

Terry Tempest Williams is an author, naturalist, educator, and environmental advocate. Her published writings on the natural world include *Refuge: An Unnatural History of Family and Place* and *Red: Patience and Passion in the Desert*.

As interested members of the public, we submit this nomination under the Federal Land and Policy Management Act (FLPMA) of 1972, 43 U.S.C. § 1701, *et seq.* and the Administrative Procedure Act 5 U.S.C. § 551 *et seq.*, and pursuant to BLM Manual 1613.21.A.2.a and 1613.41.

III. The white-tailed prairie dog is highly imperiled.

According to the best available estimates, white-tailed prairie dogs occupy less than 805,000 acres rangewide. The best available data indicate that white-tailed prairie dog occupied acreage has declined by 92% or more. White-tailed prairie dogs have specific habitat requirements, reproduce slowly, do not recover quickly from declines, and are imminently threatened with continued downward population trends due to persistent threats (Tileston and Lechleitner 1966; Clark *et al.* 1971; Menkens and Anderson 1989; Hoogland 1995, 2001; Anderson and Williams 1997; Biggins and Kosoy 2001b). Many of the same threats have led to the listing under the ESA of other prairie dog species - the Mexican prairie dog (*C. mexicanus*) is listed as Endangered, the Utah prairie dog (*C. parvidens*) is listed as Threatened, and the black-tailed prairie dog (*C. ludovicianus*) has been officially determined warranted for listing but precluded by other more pressing listing activities. Prairie dogs throughout North America have experienced systematic eradication efforts, uncontrolled recreational shooting, and substantial habitat conversion, fragmentation, and degradation (Merriam 1902; Nelson 1920; Bell 1921; Day 1928, 1932; Day and Nelson 1929; Stockard 1929b; Martley 1953; Clark 1973a, b, 1977; Randall 1976a, b; Campbell and Clark 1981; Clark *et al.* 1986; Clark 1989; Reading *et al.* 1989; Miller *et al.* 1993; Irby and Vosburgh 1994; U.S. Fish and Wildlife Service *et al.* 1995; Biodiversity Legal Foundation *et al.* 1998; National Wildlife Federation 1998; Vosburgh and Irby 1998; Keffer *et al.* 2000; Knowles and Vosburgh 2001; U.S. Fish and Wildlife Service, Region 6 *et al.* 2001; Van Fleet *et al.* 2001; U.S. Department of the Interior, Bureau of Land Management, Wyoming State Office, Buffalo Field Office 2002). Along with all of these anthropogenic threats, the scourge of sylvatic plague, a Eurasian disease to which prairie dogs have developed no immunity, has dramatically amplified population losses (Eskey and Haas 1940; Orabona-Cerovski 1991; Cully 1993; Anderson and Williams 1997; Biggins and Kosoy 2001b; Cully and Williams 2001). As a result, the prairie dog ecosystem itself is poised for collapse.

The white-tailed prairie dog is of particular importance because it acts as a keystone species, providing crucial habitat and food resources for many associated species, shaping vegetative communities, and actively altering soils. White-tailed prairie dogs provide invaluable ecosystem services to many other species found throughout the Sagebrush Sea that they call home. As white-tailed prairie dog populations continue to decline, species that rely on them such as the Endangered black-footed ferret, Proposed Threatened mountain plover, burrowing owl, and ferruginous hawk are placed at even greater risk of extinction.

Plague; recreational shooting; poisoning; oil, gas, and mineral extraction; conversion of habitat to agricultural use; urbanization; fire suppression and overgrazing; off-road vehicle use; noxious weeds; and climate change continue to threaten white-tailed prairie dogs. Existing regulatory mechanisms to protect the species are woefully inadequate, and the BLM has taken few actions to conserve this species even in Montana and Wyoming where the white-tailed prairie dog has been included on the BLM's Sensitive species list.

Examples of white-tailed prairie dog declines abound. In Colorado, the BLM was preparing the Little Snake Complex for black-footed ferret reintroduction in 1995, but a plague cycle that may have started in 1993 quickly made this impossible (U.S. Fish and Wildlife Service *et al.* 1995; Squires *et al.* 1999). There was simply not enough prey to support the ferrets that would have been released. A survey of the area last summer revealed that white-tailed prairie

dog populations remain extremely depressed (Stroh, personal communication, 2002). In Montana, 13 of the 15 colonies known to exist in the state in 1977 had been extirpated by 2001 (Flath 1979; Montana Prairie Dog Working Group 2001). Between 1995 and 1997 alone, five colonies on BLM land in Montana were extirpated (Montana Natural Heritage Program 2001). In Utah, the BLM was considering black-footed ferret reintroduction in the Cisco Complex, but a major white-tailed prairie dog population decline that began in 1998 continues today has put this plan on hold indefinitely (Cedar Creek Associates, Inc. 1986; Utah Division of Wildlife Resources 1989; Seglund, personal communication, 2002). Finally, after the white-tailed prairie dog population crashed in the Meeteetse Complex in Wyoming, the last known wild black-footed ferrets were captured to start the captive breeding program (Forrest *et al.* 1985; Clark 1986; Clark *et al.* 1986; Collins and Lichvar 1986; Campbell *et al.* 1987; Forrest *et al.* 1988; Ubico *et al.* 1988; Clark 1989; Menkens and Anderson 1991). In 1988, three years into this plague episode, 26,000 white-tailed prairie dogs were left in the Meeteetse Complex. By 1997, only 7,000 prairie dogs remained, and plague was known to still be taking its toll in 2001 (Biggins and Kosoy 2001).

Large white-tailed prairie dog complexes, even those that have already experienced significant declines, must be protected and proactively managed to ensure that this species and the many other species that depend on the prairie dog ecosystem persist and are eventually recovered so that future generations may know them and benefit from the contributions they make to western ecosystems.

IV. Large, intact white-tailed prairie dog complexes must be protected.

A complex consists of a group of prairie dog colonies where each colony is within 7 km (about 4.3 mi.) of another colony in the complex (Biggins *et al.* 1993). White-tailed prairie dog conservation must take place at the complex level rather than the colony level for several reasons:

- immigration and emigration appear to be integral to white-tailed prairie dog population ecology and thus white-taileds must be able to safely move from one colony to the next;
- plague ecology requires that multiple colonies be present in an area if recovery is to take place after a disease episode;
- habitat fragmentation and colony isolation as a result of historical prairie dog eradication campaigns have already compromised white-tailed prairie dog genetic integrity, which means that existing opportunities for gene flow should be enhanced; and
- white-tailed prairie dog populations are assaulted by threats on multiple fronts and need several large refuges if they are to persist.

These points are discussed in turn below. More detail is available in our ESA listing petition, which we incorporate by reference.

A. White-tailed prairie dogs must be able to travel between colonies.

White-tailed prairie dogs have a looser social organization than black-tailed prairie dogs, and it appears to be rather common for individuals to move to new colonies and be accepted by their inhabitants (Tileston and Lechleitner 1966; Clark 1973a; Hoogland 1979a). In several

studies where all the white-tailed prairie dogs in a given colony were marked with tags or other means of identification, adults from outside the colony kept arriving and taking up residence. For example, in one colony of 61 individuals in Wyoming, 12 new adults appeared one spring (Clark 1973a), while in another colony of 29 individuals in Colorado, 11 new arrivals were recorded (Tileston and Lechleitner 1966). In fact, in one study, over half of the adult prairie dogs found on some colonies had moved there in the previous year (Menkens 1987). This does not even take into account the dispersal of juveniles from the colony where they were born. This population dynamic has obvious implications for recovery after a disease episode, and movement between colonies should be maintained not only because it appears to be a natural part of white-tailed prairie dog ecology, but also because it may be an important survival tool.

B. Plague ecology makes the preservation of entire complexes crucial.

Plague is present throughout the range of the white-tailed prairie dog (Gage, personal communication, 2001). All colonies, even those that appear to be isolated, are susceptible because plague is transmitted by fleas that often are not host-specific and may be carried by long-ranging predators like coyotes and raptors (Eskey and Haas 1940; Ubico *et al.* 1988; Heller 1991; Anderson and Williams 1997; Cully and Williams 2001). Prairie dogs did not evolve in the presence of this Asian bacterium that was brought to North America accidentally via rats on ships around 1900, and in white-tailed prairie dogs as in other prairie dog species, death almost always follows exposure (Williams 1986; Barnes 1993; Cully 1993). Plague is the biggest threat to white-tailed prairie dog persistence.

Some of plague's impacts may be diminished by maintaining large prairie dog complexes. Often, almost all of the inhabitants of a colony die during a plague episode, and the presence of nearby colonies improves the odds that survivors will be able to find mates and begin to repopulate an area (Cully and Williams 2001). In addition, these survivors will be less likely to become prey if they are able to find another colony nearby where they can benefit from the warning barks of other prairie dogs when predators are near (Hoogland 1979, 1981). When complexes like the Meeteetse Complex were studied over time, population crashes in one colony were often accompanied by booms in another, and colonies winked out and then were reestablished (Anderson and Williams 1997). Plague is patchy and unpredictable, and preserving metapopulations or whole complexes makes more sense than preserving individual colonies in these types of conditions.

There is some evidence that plague and other population disturbances can lead to the exodus of prairie dogs from an area. In addition to noting major increases in the number of adults and juveniles in healthy colonies when plague was present in a nearby colony (Menkens 1987; Anderson and Williams 1997), researchers also have documented that 212 black-tailed prairie dogs abruptly left a colony after 23% of the inhabitants were shot (Keffer *et al.* 2000). Prairie dogs may use emigration as a survival strategy when a colony experiences a major decline; therefore, refuges of intact burrow systems should be available.

Plague can persist for long periods after a decline is first noted. Under laboratory conditions infected fleas have survived for over a year (Cully 1993), and in the wild infected fleas have been collected from prairie dog burrows up to a year after all the prairie dogs in an area have died (Fitzgerald 1993). However, inactive colonies may provide good habitat for prairie dogs after the infected fleas have all died off or moved on to other areas, and preserving inactive colonies with intact burrow systems is important to prairie dog recovery. This is why

we are requesting that both active and inactive colonies within these complexes be designated as ACECs.

C. Isolation has already impacted white-tailed prairie dog genetics.

Small populations are faced with many extinction risks. They are easier to destroy through catastrophic events like plague or flooding, and the surviving population may be less able to adapt to change because fewer genotypes remain (Allee *et al.* 1949; Petersson 1985; Brussard and Gilpin 1989). Small populations may also lose fitness by being forced to breed with close relatives in isolated populations (Schemske and Lande 1985; Wilcox and Murphy 1985; Brussard and Gilpin 1989; Oostermeijer *et al.* 1995).

Historical eradication campaigns have left white-tailed prairie dogs with a legacy of isolation and genetic bottlenecks. Between 1912 and 1923 enough poison grain was distributed in Colorado to poison 31 million rodents (Clark 1989), and between 1915 and 1927, five million acres were poisoned in Wyoming (Day 1928 as quoted in Martley 1953). By 1929, researchers were already noting the impacts of white-tailed prairie dog poisoning campaigns (Stockard 1929b). In 1976, genetic research revealed that the number of chromosomes that white-tailed prairie dogs possessed varied from region to region (with some populations having fewer chromosomes than was typical and others having more), and populations in disjunct areas had the same number of chromosomes (Pizzimenti 1976b). In other words, white-tailed prairie dogs became isolated enough in some areas that when a mutation in the number of chromosomes they possessed occurred, this mutation was perpetuated. They were unable to find breeding partners outside of the areas that they had been relegated to, and these changes were passed down from generation to generation until the entire population possessed the new number of chromosomes.

Habitat fragmentation has continued since this genetic research was conducted, and is still having deleterious effects on white-tailed prairie dog genetic integrity. White-tailed prairie dog poisoning still occurs and is even subsidized by the state of Wyoming (Reichenbach, personal communication, 2002). Large white-tailed prairie dog complexes that allow for gene flow from one colony to another are extremely important and should be protected from further fragmentation.

D. White-tailed prairie dog management must address multiple threats.

White-tailed prairie dogs face an onslaught of threats including plague; poisoning; shooting; oil, gas, and mineral exploration and development; conversion of habitat to agriculture or urban development; degradation of habitat due to fire suppression and overgrazing; off-road vehicle disturbance; noxious weeds; and climate change. Attempting to address these threats one at a time and one colony at a time is not likely to result in the management changes needed to protect prairie dogs and their habitat. Instead, comprehensive management designed to preserve white-tailed prairie dogs and their habitat is badly needed. Adopting and implementing specific management prescriptions for these 25 major white-tailed prairie dog complexes would be a significant step in demonstrating that each one of these Field Offices is committed to conserving this species, and that the BLM possesses the regulatory mechanisms to ensure that the white-tailed prairie dog does not become extinct.

V. Large white-tailed prairie dog complexes meet ACEC criteria.

BLM Manual 1613 provides three main identification criteria for ACECs: relevance, importance, and need for special management (as established and defined in 43 CFR 1610.7-2). The nominated large white-tailed prairie dog complexes meet all three criteria as well as the general objectives of ACEC designation.

A. General guidance

The objectives of ACEC designation are stated as follows:

ACEC designations highlight areas where special management attention is needed to protect, and prevent irreparable damage to, important historic, cultural, and scenic values, fish, or wildlife resources or other natural systems or processes....The ACEC designation indicates to the public that the BLM recognizes that an area has significant values and has established special management measures to protect those values. In addition designation also serves as a reminder that significant value(s) or resource(s) exist which must be accommodated when future management actions and land use proposals are considered near or within an ACEC. BLM Manual 1613.02

These large white-tailed prairie dog complexes represent important wildlife resources that desperately need special management attention and deserve the recognition and accommodation of the BLM.

BLM Manual 1622.11 provides for the designation of ACECs that provide priority habitat:

Designation of a priority habitat ACEC is identified as a possible determination made in resource management planning supplemental guidance for renewable resources (Manual Section 1622.11). BLM Manual 1613.05.B

Protection of these large complexes is a white-tailed prairie dog habitat conservation priority.

B. Relevance

For the purpose of ACEC identification, an area meets the BLM's "relevance" criterion if it "contains one or more" of several factors. Large white-tailed prairie dog complexes contain at least two of these factors:

2. A fish and wildlife resource (including but not limited to habitat for endangered, sensitive or threatened species, or habitat essential for maintaining species diversity).
3. A natural process or system (including but not limited to endangered, sensitive, or threatened plant species; rare, endemic, or relic plants or plant communities which are terrestrial, aquatic, or riparian; or rare geological features). BLM Manual 1613.11.A

First, they meet factor #2 because they represent the most extensive habitat for the white-tailed prairie dog, a highly imperiled species that is listed as Sensitive by the Montana BLM, the Wyoming BLM, and the Northern Region of the Forest Service. The Wyoming Natural Diversity Database includes "large towns" of white-tailed prairie dogs in its list of Species of Special

Concern and the Montana Natural Heritage Program lists the white-tailed prairie dog as a Species of Concern.

Second, they meet factor #2 because they provide habitat for other imperiled species. The listed Endangered black-footed ferret has been reintroduced to the Shirley Basin/Medicine Bow Complex, the Coyote Basin Complex, and the Wolf Creek Complex, and was last found in the wild in the Meeteetse Complex. All of these complexes are included in the ACEC nominations presented in this document. The proposed Threatened mountain plover is also found within some of the complexes nominated for designation here, including the Myton Bench Complex. The mountain plover is listed as Sensitive by the Colorado and Utah BLM. The Colorado Division of Wildlife lists the mountain plover as a State Special Concern Species and Montana Fish, Wildlife & Parks lists the mountain plover as a Protected Species while the Montana Natural Heritage Program, the Utah Division of Wildlife Resources, and the Wyoming Natural Diversity Database all list the mountain plover as a Species of Special Concern. The burrowing owl is also closely linked to prairie dog colonies on many complexes including the Coyote Basin Complex. The Montana, Utah, and Wyoming BLM as well as the Northern and Rocky Mountain Regions of the Forest Service list the burrowing owl as Sensitive. The burrowing owl is also listed as a State Threatened species by the Colorado Division of Wildlife and as a Protected Species by Montana Fish, Wildlife, & Parks. The Montana Natural Heritage Program, the Utah Division of Wildlife Resources, the Wyoming Game and Fish Department, and the Wyoming Natural Diversity Database all list the burrowing owl as a Species of Special Concern. The ferruginous hawk frequently seeks white-tailed prairie dogs as prey, and is associated with them in many complexes, including the Shirley Basin/Medicine Bow Complex. This species is listed as Sensitive by the Colorado, Montana, Utah, and Wyoming BLM as well as the Rocky Mountain and Northern Regions of the Forest Service. The Colorado Division of Wildlife lists the ferruginous hawk as a State Special Concern Species, Montana Fish, Wildlife, & Parks lists it as a Protected Species, and the Utah Division of Wildlife Resources lists it as a State Threatened species. The Montana Natural Heritage Program lists the ferruginous hawk as a Species of Special Concern. Declines of all of these clearly imperiled species are at least partly attributable to the loss of white-tailed prairie dog habitat, and by providing some real protections to large white-tailed prairie dog complexes, many other declining species would benefit.

Third, large white-tailed prairie dog meet factor #2 because they are essential for maintaining species diversity. Our literature review found that 115 different wildlife species have been recorded on white-tailed prairie dog colonies (Clark 1971, 1973a; Randall 1976b; Flath 1979; Martin and Schroeder 1979, 1980, 1981; Campbell and Clark 1981; Martin 1983; Clark *et al.* 1985; Orabona and Anderson 1986; Boschen 1990; Cooke 1990; Orabona-Cerovski 1991; Goodrich and Buskirk 1998; Baker *et al.* 1999; Miller 1999; Michael Baker Jr., Inc. 2000; Manning and White 2001a, b). This is testament to the incredibly diverse ecosystems that white-tailed prairie dogs create.

Fourth, prairie dog complexes are unique natural systems, and thus meet factor #3. Prairie dogs are considered keystone species because their contribution to processes or community structure is much greater than would be expected from their numbers (Meffe and Carroll 1994; Kotliar *et al.* 1999; Kotliar 2000). Not only do they provide an abundant prey source, they also construct burrows that other species use for shelter, change plant community composition and species richness, create vegetative mosaics, increase plant shoot nitrogen, change soil chemistry, alter soil texture, and in general, create a specialized environment to which many other species have adapted (Bond 1945; Clark 1970; 1973a, 1977; Krueger 1986;

Carlson and White 1987, 1988; Whicker and Detling 1988, 1993; Cid *et al.* 1991; Schloemer 1991; Munn 1993). Therefore, white-tailed prairie dogs both act as a natural process and create a natural system and thus meet factor #3 both ways.

Clearly, maintaining large white-tailed prairie dog complexes should be considered highly relevant to the management of BLM land.

C. Importance

BLM Manual 1613 defines importance as an ACEC criterion as follows:

The value, resource, system, process, or hazard described above must have substantial significance and values in order to satisfy the “importance” criteria. This generally means that the value, resource, system, process, or hazard is characterized by one or more of the following:

1. Has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern, especially compared to any similar resource.
2. Has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened, or vulnerable to adverse change.
3. Has been recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandates of FLPMA. BLM Manual 1613.11.B

Large white-tailed prairie dog complexes meet all three of these factors.

These are the largest white-tailed prairie dog complexes of which we are aware, and each has been estimated to include over 5,000 acres of white-tailed prairie dog habitat. As the largest habitat blocks for this species, they are globally significant. As reintroduction sites for the black-footed ferret, one of the most endangered mammals in North America, the Shirley Basin/Medicine Bow, Coyote Basin, and Wolf Creek Complexes also are globally significant. The black-footed ferret reintroduction program has identified prairie dog complexes of greater than 1,000 acres as the most desirable reintroduction sites (U.S. Fish and Wildlife Service 1989). Therefore, preserving each of these 25 complexes may provide yet another home for ferrets in the future, which has tremendous consequences for the success of black-footed ferret recovery. Because of the size of these complexes, the complexity of the management issues within each site, and the number and magnitude of the threats they face, developing comprehensive management plans that preserve these areas for white-tailed prairie dogs and their associated species should be of major concern.

Because prairie dogs are social, colonial, terrestrial species, their ability to adapt to change is limited. They are simply tied to the land in a way that many other species are not. In addition, white-tailed prairie dogs hibernate for up to eight months out of the year, and are totally unable to react to changes in the surrounding landscape during these periods (Tileston and Lechleitner 1966; Bakko and Brown 1967; Clark 1973a). Effective foraging during the active season is crucial for winter survival, and moving and constructing new burrow systems requires the use of precious energy and the loss of feeding opportunities. As a result, the destruction of individual colonies can be the equivalent of range reduction. By managing entire complexes to protect them from destruction, fragmentation, and degradation, the BLM would be protecting an important ecosystem that is fragile, sensitive, rare, irreplaceable, threatened, and vulnerable to adverse change. By protecting each of these 25 largest known white-tailed prairie dog complexes, the BLM would be protecting the most vulnerable and most exemplary large blocks of white-tailed prairie dog habitat.

The white-tailed prairie dog is listed as a Sensitive species by both the Montana and Wyoming BLM, and therefore has been recognized as warranting protection. FLPMA states:

The Congress declares that it is the policy of the United States that - ...

8. the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use... FLPMA Title I Sec. 102(a) [43 USC 1701]

Preserving these large white-tailed prairie dog complexes will protect the ecological values of these areas and provide food and habitat for wildlife and domestic animals. BLM Manual 6840.06.D sets forth the policy for management of Sensitive species:

State Directors, usually in cooperation with state wildlife agencies, may designate sensitive species. By definition, the sensitive species designation includes species that could easily become endangered or extinct within a state. Therefore, if sensitive species are designated by a State Director, the protection provided by the policy for candidate species shall be used as the minimum level of protection.

Therefore, the BLM must provide Sensitive species with a minimum of candidate-level protection. Candidate species are to be managed as follows:

BLM shall carry out management, consistent with the principles of multiple use, for the conservation of candidate species and their habitats and shall ensure that actions authorized, funded, or carried out do not contribute to the need to list any of these species as threatened/endangered. Specifically, BLM shall:

1. Determine the distribution, abundance, reasons for the current status, and habitat needs for candidate species occurring on lands administered by BLM, and evaluate the significance of lands administered by BLM or actions in maintaining those species.
2. For those species where lands administered by BLM or actions have a significant affect on their status, manage the habitat to conserve the species by:
 - a. Including candidate species as priority species in land use plans.
 - b. Developing and implementing rangewide and/or site-specific management plans for candidate species that include specific habitat and population management objectives designed for recovery, as well as the management strategies necessary to meet those objectives.
 - c. Ensuring that BLM activities affecting the habitat of candidate species are carried out in a manner that is consistent with the objectives for those species.
 - d. Monitoring populations and habitats of candidate species to determine whether management objectives are being met.
3. Request technical assistance from FWS/NMFS, and any other qualified source, on any planned action that may contribute to the need to list a candidate species as threatened/endangered. BLM Manual 6840.06.C

Therefore, in at least Montana and Wyoming, the BLM must manage white-tailed prairie dogs to conserve their populations and habitat. The BLM must also ensure that the actions it authorizes, funds, and carries out do not contribute to the need to list the white-tailed prairie dog under the ESA, an action that our petition has shown is warranted. Clearly, as the main land steward in white-tailed prairie dog habitat, the BLM's actions have a highly significant effect on white-tailed prairie dog status, and preserving habitat for this species should be a priority in land use

planning. By prescribing special management for each of these 25 ACECs, the BLM would begin to meet its obligations to monitor, protect the habitat of, and recover the white-tailed prairie dog. Because other ESA-listed and Sensitive species are directly dependent on white-tailed prairie dog habitat, this should be a national priority for the BLM.

These large complexes meet the importance criterion, and designation of each of these ACECs would help the BLM meet existing obligations that it has ignored.

D. Need for special management

ACECs must require special management attention, which is defined as follows:

“Special management attention” refers to management prescriptions developed during preparation of an RMP or amendment expressly to protect the important and relevant values of an area from the potential effects of actions permitted by the RMP, including proposed actions deemed to be in conformance with the terms, conditions, and decisions of the RMP. These are management measures which would not be necessary and prescribed if the critical and important features were not present. That is, they would not be prescribed in the absence of the designation. (in other words, the concept of special management is relative.) A management prescription is considered to be special if it is unique to the area involved and includes terms and conditions specifically to protect the important and relevant value(s) occurring on that area. For example, a seasonal use stipulation on permits or other use authorizations may be prescribed specifically to protect an ACEC value. BLM Manual 1613.12

These large white-tailed prairie dog complexes are not receiving special management attention tailored to prairie dog conservation now, and, as we have stated throughout this nomination, a comprehensive management prescription is badly needed for each of the 25 complexes to ensure that white-tailed prairie dog recovery may begin. Below we outline specific management recommendations for oil and gas exploration and development, off-road vehicle use, recreational shooting, poisoning, noxious weeds, livestock grazing, fire, and plague that should be prescribed for these ACECs.

VI. Requested management of ACECs designated for white-tailed prairie dog conservation

Elsewhere in these nominations we explained how complexes should be delineated and what buffers should be applied and included within the ACEC boundaries. BLM Manual 1613.22 requires that management prescriptions be developed for each potential ACEC. The BLM should develop site-specific prescriptions for each of the 25 complexes nominated, but the following basic prescriptions should be applied to all of the complexes. As required by the BLM Manual, these ACECs should be closely monitored.

A. Each of these ACECs should be undisturbed by further oil and gas exploration and development.

Oil and gas wells are seldom isolated disturbances. They are accompanied by roads, pipelines, compressor stations, power lines, and other infrastructure (Clifford 2001). In addition to fragmenting and reducing white-tailed prairie dog habitat, these disturbances may reduce forage quality, introduce noxious weeds, harm soils and vegetation, damage and destroy

burrows, and increase predation by introducing structures that act as raptor perches (Young and Sawyer 1981; Menkens and Anderson 1985; Shuman and Whicker 1986; Knapp 1996; Belnap 2002; Boyle and Connaughton 2002; Bureau of Land Management, Moab Field Office 2002; U.S. Department of the Interior, Bureau of Land Management, Wyoming State Office, Buffalo Field Office 2002).

Oil and gas exploration and extraction is currently the main source of white-tailed prairie dog habitat loss. In 2001, the BLM issued new oil and gas leases on 1.1 million acres in Wyoming, 725,000 acres in Colorado, 540,000 acres in Montana, and 327,000 acres in Utah (Darin *et al.* 2002). Much of this development is occurring within white-tailed prairie dog habitat, and although many of these 25 complexes have already been profoundly affected by oil and gas exploration and development, no further disturbance should be permitted in these areas.

We therefore request the following throughout these ACECs. No Surface Occupancy stipulations without waivers, modifications, or exceptions should be applied throughout each of these ACECs. No seismic exploration activities (including vibroseis and shot-hole techniques) should be conducted within these ACECs.

B. Off-road vehicles should be confined to designated routes. Non-system routes should be closed and rehabilitated and no new routes should be constructed in these areas.

Off-road vehicles can damage vegetation and soils, introduce and foster the growth of noxious weeds, injure and kill white-tailed prairie dogs, fragment habitat, and allow recreational shooters easy access to even remote prairie dog colonies (Liddle 1975; Liddle and Greig-Smith 1975; Spiridinov 1979; Mack 1986; Belnap 2002; Bureau of Land Management, Moab Field Office 2002).

Off-road vehicle use has grown exponentially throughout the West. For example, in Colorado, the number of registered all-terrain vehicles and dirt bikes grew from 11,774 in 1990 to 62,000 in 2000 (Rocky Mountain Recreation Initiative 2002), and registrations in Utah increased from 34,000 vehicles in 1997 to over 100,000 in 2001 (Bureau of Land Management 2002). In Colorado, motorized vehicles are allowed at least seasonally on 93% of the land managed by the BLM, and only three law enforcement officers patrol the 8.2 million acres of BLM land in the state (Rocky Mountain Recreation Initiative 2002). In Wyoming, only 2% of the land managed by the BLM is closed to off-road vehicles, and only six law enforcement officers patrol over 18 million acres (Goldbach, personal communication, 2002).

We therefore request the following throughout each of these ACECs. Off-road vehicles should be limited to designated routes, and existing routes that have not been specifically designated for motorized use should be closed and rehabilitated. Consider closing routes that cross these complexes. The BLM should ensure that off-road vehicle regulations are enforced and that fines serve as a deterrent to noncompliance.

C. White-tailed prairie dog shooting should be closed year-round.

Using live targets, especially members of an imperiled keystone species, for shooting practice is an indefensible practice that needlessly amplifies white-tailed prairie dog declines. In addition to causing population declines, prairie dog shooting has been shown to cause deleterious

changes in behavior and population structure, increased predation, decreased population density, and decreased colony expansion rates.

Shooting is affecting white-tailed prairie dog numbers. Data from the Colorado Division of Wildlife (2002a, b, c) indicate that between 74,000 and 244,000 white-tailed prairie dogs were shot in Colorado between the fall of 1999 and the spring of 2002. Colorado is the only one of the four states within the white-tailed's range to survey prairie dog shooting. Even on federal lands in Montana where a year-round closure is in effect, little to no enforcement is taking place (Whitford, personal communication, 2002).

The BLM has the legal authority to regulate prairie dog shooting on BLM lands. In fact, the Montana BLM has exercised this authority on black-tailed prairie dog colonies in black-footed ferret reintroduction areas (64 Fed. Reg. 56213 (Oct. 18, 1999)).

We therefore request the following. White-tailed prairie dog shooting should be prohibited throughout each of these ACECs. Closures must be enforced, and the consequences of noncompliance must serve as deterrents to violation.

D. White-tailed prairie dog poisoning should not be permitted and violations should not be tolerated.

Poisoning further fragments colonies that have already been impacted by plague and historical prairie dog eradication campaigns (Biggins and Kosoy 2001b). After a poisoning event, survivors are more susceptible to predation and less likely to find mates, and colonies are more susceptible to extinction because of decreases in population size and genetic diversity. Because plague monitoring is spotty, white-tailed prairie dog die-offs are often attributed to plague events without any investigation of poisoning. Prairie dog poisoning is inhumane and needlessly places other species at risk.

We therefore request the following throughout each of these ACECs. The BLM should maintain a ban on poisoning prairie dogs and clearly inform all lessees and adjacent private property owners that white-tailed prairie dog poisoning will not be tolerated. Suspected poisoning events should be investigated, and the consequences of noncompliance must serve as deterrents to violation.

E. Noxious weeds should be controlled using methods that minimize surface disturbances and effects on non-target species.

Habitat fragmentation and degradation continue to introduce noxious weeds to once pristine areas. Every day, through surface disturbances like those associated with oil and gas exploration and development, off-road vehicle use, and livestock grazing, noxious weeds invade an estimated 4600 acres of public lands in the West (65 Fed. Reg. 54544 (Sept. 8, 2000)). Cheatgrass and halogeton have already become established in many white-tailed prairie dog complexes.

Cheatgrass currently poses the greatest noxious weed threat to white-tailed prairie dogs. This species places prairie dogs at risk because its productivity is highly variable and it provides very little forage in drought years, it is extremely susceptible to wildfire and alters fire regimes, it dries up quickly and fails to provide necessary protein, and it forms dense monocultures and displaces important native plants (Knapp 1996; Young and Allen 1997; Goodwin *et al.* 1999).

We therefore request the following throughout these ACECs. The BLM should develop a noxious weed management plan, addressing both the prevention and treatment of infestations, for each ACEC. Noxious weeds should be controlled using methods that minimize surface disturbances and effects on non-target species. All surface disturbances should be avoided to prevent the spread and establishment of noxious weeds.

F. Grazing practices that degrade white-tailed prairie dog forage should be discontinued.

Under drought conditions, prairie dogs and cattle may be forced to compete for forage if stocking levels are not reduced in response to decreased vegetative productivity. Drought can cause white-tailed prairie dogs to enter aestivation (summer hibernation) early (Bakko and Nahorniak 1986), and prairie dogs without adequate fat stores will perish over the winter. Livestock contribute to the spread of noxious weeds by displacing more palatable native plants, preventing more palatable native plants from reproducing by eating flowers or fruits, transporting weed seeds in their hides, hooves, manure, or hay, and disturbing soils (Robertson and Kennedy 1954; Kitchen and Hall 1996; Knapp 1996; Kaltenecker *et al.* 1999; Belsky and Gelbard 2000).

In some areas white-tailed prairie dogs are being displaced because sagebrush stands are becoming too dense or pinyon-juniper forest is moving into former shrublands. Livestock contribute to shrub encroachment by reducing fire frequency by leaving less dead plant litter on the ground and by reducing competition from more palatable grasses and forbs (Cole *et al.* 1997; Austin and Urness 1998; Goodrich *et al.* 1999). Ninety percent of all BLM lands are grazed (Zakin 1998), and the BLM estimates that 68% of public rangelands have deteriorated to unsatisfactory condition because of overgrazing (Bureau of Land Management 2000a, as cited in American Lands Alliance 2001).

We therefore request the following throughout these ACECs. Grazing practices should not be permitted to pose a threat to white-tailed prairie dogs. With proper stocking levels and the avoidance of white-tailed prairie dog habitat that already requires rehabilitation, prairie dogs and livestock should be able to coexist. When prairie dog declines occur, local grazing practices should be reviewed and altered if necessary. Livestock grazing pressure should always be reduced in drought years.

G. Natural fire regimes should be restored.

A century of fire suppression has reduced and degraded white-tailed prairie dog habitat. At higher elevations, pinyon-juniper expansion has led to white-tailed prairie dog habitat loss, and prairie dogs are easy targets for raptors that use these trees as perches. In some lower elevation areas, sagebrush has become too dense for white-tailed prairie dogs to build burrow mounds and find forage.

We therefore request the following throughout these ACECs. Natural fire regimes should be restored, and wildfires should be allowed to burn when they do not pose a threat to human structures or safety. Mechanical and chemical treatments designed to decrease sagebrush density appear to increase shrub cover over the long-term (Watts and Wambolt 1996), and are inappropriate substitutes for natural fire disturbance – these should not be used.

H. Plague management is necessary.

Too often prairie dog declines are assumed to be plague events with no investigation of poisoning or shooting. Conversely, declines from plague may be dismissed as early aestivation events, and plague intervention may be needlessly delayed. Active plague monitoring is necessary to determine and address the real causes of prairie dog declines as well as to better understand plague biology and disease dynamics.

We therefore request the following throughout these ACECs. Plague monitoring through collection of fleas and testing of prairie dog carcasses should be conducted in areas with suspected prairie dog declines and in all black-footed ferret reintroduction areas. At present, dusting burrows with insecticides is advised in colonies where plague is known to be active. Because existing insecticides are not flea-specific, dusting burrows to limit the spread of plague should be seen as a temporary measure to be applied in areas without significant non-target species concerns.

I. These areas should serve as priority sites for prairie dog relocation

While prairie dogs should be conserved on private lands, in some cases this may not be possible. Relocation programs should be carefully crafted. The Utah prairie dog relocation program has moved tens of thousands of prairie dogs with very little success, and should serve as an example of the many pitfalls that may be encountered. When prairie dogs are relocated from private lands, they should be transferred to suitable habitat (preferably with existing white-tailed prairie dog burrow systems) that is actively managed for prairie dogs in areas where incompatible land uses have been curtailed. Portions of these ACECs should meet these criteria.

We therefore request the following throughout these ACECs. Each ACEC should be evaluated for its value as a white-tailed prairie dog relocation site. Relocation plans should be developed for those portions of these ACECs that represent high value relocation areas. While private landowners should pay for relocation costs plus a surcharge devoted to prairie dog management, the BLM should facilitate the relocation of prairie dogs from colonies that face imminent destruction on private lands. Relocation should be accomplished using protocols that have proved successful for other prairie dog species while protocols specific to white-tailed prairie dogs are developed.

J. Monitoring is critical.

The BLM Manual 1613.6, 1613.63, 11613.65 clearly states that monitoring is critical:

ACEC monitoring is part of the monitoring provisions in the RMP. The BLM's planning regulations prescribe that the RMP shall establish intervals and standards for monitoring. The intervals and standards are to be based on the sensitivity of the resources. In the case of ACEC's, the resources are assumed to be sensitive. Therefore, careful monitoring is critical – not only to ensure that protection of the identified resource values occurs, but also to keep the managing official aware of how well the RMP provisions are accomplishing their objectives....In the case of the ACEC's, it is particularly important that the monitoring measures be systematic and structured so that the managing official is informed on a timely basis of any significant changes in the related plans of other Federal agencies, State or local governments, or Indian tribes. In accordance with 40 CFR 1505.3(d), the managing official shall, upon request, make available to the public the results of monitoring. BLM Manual 1613.63

Annually the State Director is required to report to the Director (760) on progress in implementing and monitoring ACEC's in order to track accomplishments in managing ACEC's and to provide an available base of information for responding to Congressional or other inquiries.... BLM Manual 1613.65

Monitoring of these ACECs should obviously involve monitoring of their prairie dog populations in order to assess how well the management prescriptions are working and whether additional protections are necessary. Monitoring programs should collect data that allow for comparisons across years and sites; participants in the black-footed ferret reintroduction program have developed structured and replicable white-tailed prairie dog monitoring protocol that should be used consistently.

VII. These nominations must be carefully evaluated by the BLM and included in land use planning.

Both FLPMA and the BLM Manual clearly state that the identification, designation and protection of ACECs are extremely important aspects of land use planning. The Field Offices of the BLM that manage the complexes nominated for designation must consider these nominations in ongoing and future land use planning.

A. FLPMA gives priority to the designation of ACECs in land use planning.

FLPMA repeatedly emphasizes the importance of ACECs in managing BLM lands:

The Congress declares that it is the policy of the United States that - ...

11. regulations and plans for the protection of public land areas of critical environmental concern be promptly developed...FLPMA Title I Sec.102(a) [43 USC 1701]

The Secretary shall prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern. FLPMA Title II Sec. 201(a) [43 USC 1711]

In the development and revision of land use plans, the Secretary shall - ...

4. give priority to the designation and protection of areas of critical environmental concern....FLPMA Title II Sec. 202(c) [43 USC 1712]

The Field Offices managing the nominated ACECs should ensure that they carefully review these nominations before making a final decision on designation that could be construed as arbitrary and capricious.

B. The submission of an ACEC nomination should trigger a set of responses by the BLM.

The BLM Manual in concordance with the BLM's planning regulations (43 CFR 1610.7-2) outline a clear process by which ACECs are considered in land use planning.

1. External nominations must be considered in the identification of potential ACECs.

The BLM Manual explains that external nominations are important to potential ACEC identification.

Areas to be considered in the identification of potential ACEC's include:...

2. Areas recommended for ACEC consideration.
 - a. External nominations. Members of the public or other agencies may nominate (i.e., recommend) an area for consideration as a potential ACEC....There are no formal or special procedures associated with nominations/recommendations submitted by the public or other agencies, i.e., there are no forms or other submission requirements for identifying potential ACEC's. BLM Manual 1613.21.A

2. Information submitted by conservation organizations is to be considered in evaluating the relevance and importance of identified potential ACECs.

In evaluating the relevance and importance of potential ACECs, the input of conservation organizations is to be considered:

Information on relevance and importance is actively sought during planning to aid the evaluation of potential ACEC areas.

1. Evidence of the relevance and importance criteria may be derived from non-BLM sources or from the judgment of specialists qualified by knowledge, training or experience to comment on the area or resource in question....
2. Non-BLM sources of information include, but are not limited to, other Federal agencies; State or local governments; international organizations or programs; State historic or natural heritage programs; universities and other research institutions; conservation organizations; and public interest groups. BLM Manual 1613.21.B

3. An interdisciplinary team is to evaluate whether an identified area meets the relevance and importance criteria.

An interdisciplinary team should evaluate whether a nominated area meets the relevance and importance criteria:

Evaluate Each Resource or Hazard to Determine if it Meets Both the Relevance and Importance Criteria. This initial evaluation is accomplished by an interdisciplinary team as part of the analysis of the management situation during the resource management planning process (BLM Manual Section 1616.4). The Area Manager, with District Manager concurrence, approves the relevance and importance evaluations. An area meeting the criteria is identified as a potential ACEC appropriate for further evaluation in the RMP process and perhaps temporary management. BLM Manual 1613.21C

4. If a nominated area is found to not meet ACEC criteria, the RMP must explain why and include management prescriptions that consider the identified values of an area.

Once an area has been nominated for designation, if it is determined to not meet ACEC criteria the rationale for this decision must be given in the forthcoming RMP revision or plan amendment, and the values identified by the nominator should be considered when management prescriptions for that area are developed:

When an area is found not to meet the relevance and importance criteria, the analysis supporting that conclusion must be incorporated into the plan and associated environmental document. The management prescriptions which are eventually established in the plan for such areas shall reflect consideration of the identified values....If an area is being evaluated as the result of a public nomination and it is determined that the area should not be considered further, the nominator should be notified that the area does not meet the required criteria. BLM Manual 1613.21.D

5. Nominated ACECs must be evaluated even if plan revision is not underway, and a plan amendment or temporary special management may be warranted.

ACECs may be nominated even when plan revision is not in progress, and a preliminary evaluation should take place after receiving such a nomination. The District Manager may determine that either a plan amendment or temporary management are required.

If an area is identified for consideration as an ACEC and a planning effort is not underway or imminent, the District Manager or Area Manager must make a preliminary evaluation on a timely basis to determine if the relevance and importance criteria are met. If so, the District Manager must initiate either a plan amendment to further evaluate the potential ACEC or provide temporary management until an evaluation is completed through resource management planning. Temporary management includes those reasonable measures necessary to protect human life and safety or significant resource values from degradation until the area is fully evaluated through the resource management planning process. BLM Manual 1613.21.E

The public has an opportunity to submit nominations or recommendations for areas to be considered for ACEC designation. Such recommendations are actively solicited at the beginning of a planning effort. However, nominations may be made at any time and must receive a preliminary evaluation to determine if they meet the relevance and importance criteria, and, therefore, warrant further consideration in the planning process....BLM Manual 1613.41

6. At least one special management prescription must be developed for each area that meets the relevance and importance criteria and is thus determined to be a potential ACEC.

The need for special management is one the three main criteria for identifying potential ACECs, and at least one special management prescription must be identified for each area that the District Manager determines meets the relevance and importance criteria (BLM Manual 1613.22).

7. Each potential ACEC must appear as a recommended ACEC in at least one plan alternative.

Each potential ACEC must be recommended for designation in at least one plan alternative, according to the BLM Manual:

...A potential ACEC (or portion thereof) must be shown as recommended for designation in any or all alternatives in the draft RMP in which special management attention is prescribed to protect the resource or to minimize hazard to human life and safety. Because special management attention must be prescribed in at least one plan alternative, each potential ACEC will appear as a recommended ACEC in at least one plan alternative....BLM Manual 1613.22.B

8. The preferred alternative must discuss the rationale for proposing or not proposing each of the potential ACECs for designation.

Even when potential ACECs are not recommended for designation in the preferred plan alternative, the rationale for doing so must be included:

The rationale for ACEC designations in the preferred alternative must be discussed. The rationale for not proposing designation of a potential ACEC in the preferred alternative must also be provided. In other words, if the proposed plan does not call for special management attention of a potential ACEC in the preferred alternative (and therefore, it is not proposed for designation), the reasons for the decision not to provide special management attention must be clearly set forth. BLM Manual 1613.33.E

9. Schedules for the implementation of ACEC management needs are to be prepared.

Once an ACEC is designated, a full implementation schedule should be prepared:

An implementation schedule must be prepared for each ACEC. Such schedules shall identify the priority, sequence, and costs of implementing activities associated with protection of the ACEC resources or values, including monitoring activities....BLM Manual 1613.61

10. State Directors must report to the Director on ACEC monitoring and implementation annually.

State Directors should report on the status of ACEC monitoring and implementation annually:

...The report will cover management measures undertaken and completed during the previous fiscal year as well as proposed management measures to be initiated in the next fiscal year. The report, to be provided to the Director (760) by October 15 of each year, must include, as a minimum, the following information for each ACEC: name of the ACEC; size (in hectares and acres); date of designation; identification of the applicable land use plan; relevant and important values being protected; implementation actions accomplished during the previous fiscal year; whether or not an activity plan has been deemed necessary and, if so, whether or not it has been prepared; and, scheduled implementation measures for the ensuing fiscal year....Its timely submission is critical. BLM Manual 1613.65

VIII. Conclusion

ACEC designation for each of these large white-tailed prairie dog complexes would be an important step for each of these Field Offices of the BLM to take to show that they are committed to preserving this species and the special ecosystem that it creates, and that they possess the regulatory mechanisms necessary to protect the white-tailed prairie dog, and its associated species, from extinction. We look forward to each of the 25 preliminary evaluations that should be prepared in response to these nominations. Please contact us if we can be of any assistance throughout this process, and again, please feel free to consult our ESA white-tailed prairie dog listing petition for more information.

Sincerely,

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