



CENTER FOR NATIVE ECOSYSTEMS

1536 Wynkoop, Suite 302
Denver, Colorado 80202
303.546.0214 fax: 303.825.2403
cne@nativeecosystems.org
www.nativeecosystems.org

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TO:
Northwest Colorado Stewardship members
Little Snake Field Office manager and staff

Dear all,

Center for Native Ecosystems recently submitted nominations for various Areas of Critical Environmental Concern (ACECs) to be adopted during the process of revising the Little Snake Field Office's Resource Management Plan. This action has been accompanied by some miscommunication and misunderstanding, and therefore we wish to clarify both our intentions and our nominations here.

When Suzanne Jones of The Wilderness Society recently informed NWCOS participants that participating conservation organizations would only be submitting a limited number of coordinated ACEC nominations, Center for Native Ecosystems had not adequately communicated with Suzanne about our own plans. We regret both our lack of communication with Suzanne and with the rest of NWCOS.

Our nominations for ACECs consisted of all the areas on BLM land in the Little Snake Field Office identified as Potential Conservation Areas by the Colorado Natural Heritage Program (CNHP). The Colorado Natural Heritage Program tracks and ranks Colorado's rare and imperiled species and habitats, and provides information and expertise on these topics to promote the conservation of Colorado's valuable biological resources. It is a project of the Department of Fishery and Wildlife Biology at Colorado State University. It is not affiliated with Center for Native Ecosystems or any other conservation advocacy organization. CNHP's information and mapping of Potential Conservation Areas is publicly available, and their website includes downloads of GIS mapping data for these Potential Conservation Areas at <http://www.cnhp.colostate.edu/gis.html>.

Center for Native Ecosystems used CNHP's proposals for Potential Conservation Areas as the basis for our ACEC nominations because this information represents the results of extensive field research and the best knowledge of experts on the biology, ecology, and conservation needs of a wide variety of native plant and animal species in the state. CNHP is the leading authoritative source in Colorado of accurate information on the location of critical habitats and specific occurrences of rare and imperiled native species. Their recommendations of Potential Conservation Areas are made based on the best collections of rare and native plant communities, the sites with the highest natural diversity and abundance of species, and the most important locations to protect in order to preserve native biodiversity. Quite simply, in most places around the state, CNHP's Potential Conservation Areas are the most important sites for the long-term health of the ecosystems in which they are found. For this reason, we felt the Potential Conservation Areas

within the Little Snake Field Office were important places to consider for preservation and special management through the designation of ACECs.

The list of Potential Conservation Areas (PCAs) that fall within or partly within the Little Snake Field Office is long. However, before the size of the list causes undue alarm, there are several important factors to consider related to the specific sites on the list and our intention in nominating them:

- Most of the PCAs are extremely small. Even the largest PCA is under 8000 acres, and all but about four of them are less than 2000 acres in size. The overwhelming majority are even smaller than that, with many well under 500 acres and a few less than 100 acres in size. Even if every PCA was designated as an ACEC, the total land area so designated would be a tiny fraction of the total land area of the Little Snake Resource Area.
- Several of the PCAs cover existing ACECs. In each case, these PCAs propose slightly different boundaries than the existing ACECs, and we included them in our nomination only to prompt consideration of adding these small areas to the existing ACECs.
 - The PCAs called Lookout Mountain, Vermillion Bluffs North, and Vermillion Bluffs South all overlap partially with the existing Lookout Mountain ACEC
 - The PCA called Irish Canyon overlaps significantly with the Irish Canyon ACEC, of course, and the Limestone Ridge ACEC
- Several of the PCAs cover existing Special Management Areas already designated by the BLM. In these cases, for the most part, designating them as ACECs would not add significant land use restrictions, as these areas are already managed with preservation of biological values such as rare plants in mind. For example, the PCAs called G Gap, Vermillion Bluffs, and Vermillion Creek are all Special Management Areas already.
- Several of the PCAs are mostly found within Dinosaur National Monument, Browns Park National Wildlife Refuge, or other public lands not managed by the BLM. In these cases, we included them in our nomination to prompt consideration of how best to protect the portions of them that fall on BLM land, though we would assume and expect that such protection would be considered in coordination with the adjacent land management agencies when appropriate. We also recognize that in these cases, especially where the portion of the PCA falling on BLM land is extremely small, appropriate conservation through ACEC status may be difficult or infeasible from a management perspective. Nonetheless, we point them out because they are areas of high biological significance that certainly meet the criteria for ACEC status.
 - The PCAs called Gates of Lodore, Zenobia Peak and Douglas Mountain, Buffham Place, Hackings Draw, and The Steps are all found mostly within the boundaries of Dinosaur National Monument
 - The PCAs called Spitzie Draw, Sterling Place, and Browns Park North are all found partially or mostly within the boundaries of the Browns Park National Wildlife Refuge
 - The PCA called Upper Fish Creek is found partially on land managed by the U.S. Forest Service
 - The PCAs called Talamantes Creek, Talamantes Creek South, Fonce Flat, Horse Draw, East Boone Draw, The Nipple, and Fourmile Creek Mudspring Draw are all

found at least partially on land owned by the state of Colorado. In some cases, these PCAs are found almost entirely on such State Land Board land

- The PCAs called West Boone Draw, Pablo Spring, Zenobia Spring East, Chicken Spring, Whiskey Spring, Browns Draw, Yampa River at Lily Park, Little Snake River at Cross Mountain, Little Snake River South of Powder Wash, Cedar Springs Draw, Deception Creek, Juniper Mountain, Boston Hill, Yampa River at Little Juniper Canyon, Middle Yampa River, Milk Creek-Moffat County, Good Spring Creek, Stinking Gulch, Stinking Gulch at Monument Butte, Williams Fork, Williams Park, Freeman Creek, Little Trout Creek, Phillips Creek, Elkhead Creek, Elkhead Creek and Aigner Mountain, Black Meadow, and Tipton are all found at least partially on privately owned land. In some cases, these PCAs are almost entirely on private land. In these cases, obviously we would expect the BLM only to pursue ACEC designation in places where it is appropriate to the management situation, the size of the potential area to be protected, and the relationship between the BLM and the adjacent land owners.
 - The PCAs called Pond Lily Lakes, Pleasant Valley, Willow and Beaver Creeks, and South Fork Park are all found partially on private land, partially on U.S. Forest Service land, and partially on BLM land. We would expect the same criteria would apply here as above, where reasonable consideration of the biological values of the land is balanced with due consideration of the interaction with adjacent land owners
- Of the remaining 27 PCAs, 15 overlap with the other proposals for ACECs submitted by Reed Morris of the Colorado Wilderness Network. In most cases, those PCAs are fully encompassed within boundaries of the ACECs proposed by Colorado Wilderness Network. The PCAs called G Gap, G Gap Southwest, Vermillion Bluffs West, Vermillion Bluffs, North Vermillion Bluffs, South Vermillion Bluffs, Vermillion Bluff East, Lookout Mountain, Vermillion and Dry Creek Ridge, Sugarloaf Buttes South, West Boone Draw, Vermillion Creek Falls, and Vermillion Creek are found entirely within the Vermillion Basin ACEC proposed by Colorado Wilderness Network. In this case, we of course hope that the information we submitted for each of these PCAs would primarily be considered in support of the larger set of information Reed provided and would only be considered for separate nominations in the event that the proposed Vermillion Basin ACEC is ruled out.
 - One of the PCAs, Middle Yampa River, also overlaps significantly with a stream segment recently identified as eligible for Wild and Scenic River designation. In the case that such designation is made, an additional designation as an ACEC may be redundant and unnecessary to protect the natural values found there. In such a case, we would of course not expect ACEC designation to be pursued.
 - The remaining 14 PCAs that are found entirely on BLM land and are not geographically incorporated in another existing special designation proposal are by and large extremely small. Only three are even over 700 acres in size, and eight are less than 300 acres. Five are under 130 acres, and two are even less than 100 acres in size. Even if all 14 of these PCAs were designated as ACECs, they would only add 8,407 acres to the existing land area protected in ACECs.

We hope that these important factors are considered when reacting to our proposals for ACEC nominations. While we firmly assert the validity of our proposals, we recognize the above described factors as significant caveats to their consideration. If nothing else, we hope our nominations can serve to remind NWCOS and the BLM during this important process of the specific locations that are most critical to native biological diversity and longterm ecosystem health in the Little Snake Resource Area. Thank you for your consideration and understanding. Please feel free to direct any questions to me.

Sincerely,

Josh Pollock
Conservation Director