

COLORADO WILDERNESS NETWORK
Colorado Environmental Coalition
Colorado Mountain Club
Sierra Club
Western Colorado Congress
The Wilderness Society

July 8, 2005

John Husband, Area Manager
Jeremy Casterson, Planner
Little Snake Field Office
455 Emerson Street
Craig, Colorado 81625

**Re: Submission of Proposed Areas of Critical Environmental Concern And
Additional Special Management for the Little Snake Resource Area Planning
Process**

Dear Mr. Husband and Mr. Casterson:

With this letter, the Colorado Wilderness Network—including member groups Colorado Environmental Coalition, Colorado Mountain Club, Sierra Club, Western Colorado Congress, and The Wilderness Society—submit their proposal for special management areas to be designated during the Little Snake Resource Management Plan (RMP) revision. In accordance with Bureau of Land Management (BLM) policy, this proposal identifies areas that meet the criteria for designation as Areas of Critical Environmental Concern (ACECs), as well as exhibiting naturalness and providing opportunities for solitude, primitive recreation, habitat for key animal and rare plant species, rich cultural resources, scenic values, geological resources, and many other sensitive values needing protection. This proposal is in addition to the proposal for designation of Wilderness Study Areas (WSAs) and protection of Wilderness Characteristics submitted separately.

At the outset, we urge BLM to retain and improve ACEC and other special management protections for the resources and areas currently designated in the RMP governing BLM managed lands in the Little Snake Resource Area. We additionally urge BLM to consider and designate these newly nominated ACECs, which expand upon or could replace these existing ACECs and better protect the areas' cultural, natural and scenic values.

The attached information sets out specific proposals for protection of several lands contained in the Citizens' Wilderness Proposal—specifically Vermillion Basin, Cross Mountain, and Diamond Breaks—through formal nomination as ACECs/ONAs and Pinyon Ridge (only a portion of which is in the Little Snake Resource Area) for protection through special management prescriptions. All of the areas identified in our submission qualify as ACECs in accordance with the Federal Land Policy and Management Act (43 U.S.C. § 1712(c)(3) and 43 C.F.R. 1610.7-2; and BLM Manual 1613. They are uniquely wild and unspoiled, with resulting intact plant and wildlife

habitat and protected cultural sites. These areas all contain important historic, cultural or scenic values, plant and wildlife resources or other natural systems or processes that are relevant (having significant values) and important (having special significance and distinctiveness by being more than locally significant and/or especially rare, fragile or vulnerable), and require special management attention to protect and prevent damage to these values. In addition, many of these areas can be managed through other designations and prescriptions (such as WSAs), which are also described in further detail in our Wilderness Character submission to BLM.

The detailed information on values and threats, as well as the proposal for best management of the areas, constitute significant new information that was not considered during the preparation of the current Little Snake RMP. We point the BLM to find other new information as well as greater detail on several values included in these proposals in the Wilderness Character Inventory Reports submitted under separate cover, which should be considered as providing BLM more detailed information regarding the nominations herein. We included comment letters groups submitted during previous comment periods containing additional information on Vermillion Basin and Pinyon Ridge. Also, we have attached numerous other exhibits including conservation reports outlining significant ecological values, conservation designations, and several maps indicating locations of special values and threats.

It is vital that BLM fully assess this proposal and consider the impact of alternative management decisions on the special areas we have identified. We are available to answer questions and provide further information regarding our proposal and look forward to continuing to discuss the protection of these valuable resources throughout the planning process.

Sincerely,

Reed Morris
Northwest Colorado Campaign Coordinator
Colorado Wilderness Network
11 W. Victory, #208
Craig, CO 81625

for the Colorado Wilderness Network, including:

Suzanne Jones
Regional Director
The Wilderness Society

Adriana Raudzens
Associate Southwest Regional Representative
Sierra Club

Vera Smith
Conservation Director
Colorado Mountain Club

Kurt Kunkle
Inventory Director
Colorado Environmental Coalition

Mark Schofield
Public Lands Organizer
Western Colorado Congress

Enclosures

- Nominations
 - Cross Mountain (ACEC/ONA)
 - Diamond Breaks (ACEC/ONA)
 - Vermillion Basin (ACEC/ONA)
 - Pinyon Ridge (Special Management Area)
- Archive documents
 - Comments on the BLM's field inventory of Citizen-Proposed Colorado Wilderness Areas, originally submitted to BLM Colorado State Director, April 9, 1998 (these comments address Pinyon Ridge and Vermillion Basin)
 - Letter commenting on the reinventory of Vermillion Basin proposed wilderness, originally submitted to BLM Little Snake Field Office, January 12, 2001
 - BLM reinventory analysis of Wilderness Characteristics in Vermillion Basin
- Map sets
 - nominated areas (4)
 - regional energy leasing and production (2)
 - Little Snake Resource Area existing oil and gas leases
 - Colorado Natural Heritage Program Potential Conservation Areas
 - Colorado Natural Heritage Program Element Occurrence Records (course location descriptions)
 - Heart of the West Network Design
- Special Areas Reports
 - Colorado Natural Heritage Program Potential Conservation Areas (16)
 - Colorado State Parks, Colorado Natural Areas Program Natural Areas (3)