



January 31, 2005

Jeremy Casterson  
Planning Coordinator  
Bureau of Land Management  
Little Snake Field Office  
455 Emerson Street  
Craig, Colorado 81625

RE: Scoping Comments for BLM's Little Snake Field Office RMP Revision

Dear Mr. Casterson:

The Nature Conservancy respectfully submits the attached Scoping Comments for consideration in the Little Snake Field Office (LSFO) Resource Management Plan Revision.

The Nature Conservancy is an international conservation organization dedicated to preserving the plants, animals and natural communities that represent the diversity of life on Earth by protecting the lands and waters they need to survive. The Nature Conservancy has an organization-wide commitment to working with partners to accomplish this mission in a science-based, collaborative manner.

Working with partners to take a proactive, science-based approach to conservation planning, The Nature Conservancy has completed assessments of the biological resources of the region containing the LSFO Planning Area. These analyses identify the LSFO Planning Area as supporting species and habitats which are important in a region wide, and world wide context. With the input of the best available data and knowledge from the Wyoming, Utah and Colorado Natural Heritage Programs, and a range of private, academic, state and federal scientists and land managers, The Nature Conservancy has identified the species and plant communities within this region and within the LSFO Planning Area. This special attention is warranted because these species, plant communities and systems are documented to be endemic, vulnerable, declining

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and/or imperiled. These analyses support the importance of the species that the Bureau has listed as Special Status Species in Colorado, and also identify some additional species and plant communities in need of special management attention.

In addition to identifying species and habitats of concern, our analyses have identified an array of geographic areas which optimize inclusion and coverage of the largest number of these species and habitats for conservation. These areas represent one scenario that , with appropriate management, could conserve these species and habitats in an efficient manner. However, it is not the only such array that could be identified, and we would welcome the opportunity to work with your planning team to provide a more thorough explanation of how these analyses were conducted.

Our hope is that these scoping comments will highlight information and issues that can enhance the LSFO staff's ability to make wise and balanced resource management decisions. Thank you for the opportunity to comment.

Sincerely,

Ann S. Oliver  
Yampa River Project Director

**Scoping Comments for Little Snake Field Office  
Resource Management Plan Revision  
Submitted by The Nature Conservancy  
January 28, 2005**

**Special Status Species**

The Nature Conservancy has completed analyses to identify the species which are globally imperiled, declining, endemic, disjunct, vulnerable, or wide ranging for which the Little Snake Field Office (LSFO) Management Area supports important, high quality populations and/or habitat. Special management attention and assessment of should be devoted to these species within the LSFO, including assessment of impacts from proposed uses and management strategies, in order to ensure their long term persistence within the region.

- A. Special management attention should be given in the LSFO RMP Revision to restore, maintain, and enhance the following Special Status Species and their habitat:

<b>Species Group</b>	<b>Common Name</b>	<b>Scientific Name</b>	<b>Status*</b>	<b>Global Rank*</b>
<b>Amphibians</b>	Northern Leopard Frog	<i>Rana pipiens</i>	BS	G5
<b>Birds</b>	Ferruginous Hawk	<i>Buteo regalis</i>	BS	G4
	Greater Sage-Grouse	<i>Centrocercus urophasianus</i>	BS	G5
	Western Yellow-billed Cuckoo		C	
	Columbian Sharp-tailed Grouse	<i>Tympanuchus phasianellus columbianus</i>	BS	G4T3
<b>Fish</b>	Bluehead Sucker	<i>Catostomus discobolus</i>	BS	G4
	Roundtail Chub	<i>Gila robusta</i>	BS	G2G3
<b>Mammals</b>	Townsend's Big-eared Bat	<i>Plecotus townsendii</i>	BS	G4T4
<b>Reptiles</b>	Midget faded rattlesnake	<i>Crotalus viridis concolor</i>	BS	G5T4
<b>Plants</b>	White River Beardtongue	<i>Penstemon scariosus</i> var. <i>albifluvis</i>	C	G4T1
	Ute Ladies Tresses	<i>Spiranthes diluvialis</i>	T	G2
	Debris Milk-vetch	<i>Astragalus detritalis</i>	BS	G3
	Duchesne Milk-vetch	<i>Astragalus duchesnensis</i>	BS	G3
	Nelson's Milk-vetch	<i>Astragalus nelsonianus</i>	BS	G2
	Ownbey's Thistle	<i>Cirsium ownbey</i>	BS	G3G4T

				3T4
	Tufted Cryptantha	Oreocarya caespitosa	BS	G4
	Uinta Basin Spring Parsley	Cymopterus duchesnensis	BS	G2
	Woodside Buckwheat	Eriogonum tumulosum	BS	G3
	Narrowleaf Evening Primrose	Oenothera acutissima	BS	G2
	Ligulate Feverfew	Bolophyta ligulata	BS	G3
	Gibbens Beardtongue	Penstemon gibbensii	BS	G1
	Mountain Clover	Trifolium andinum	BS	G3

**\*Key:**

T = Federally listed as threatened

E = Federally listed as endangered

C = Federal candidate species

BS = BLM sensitive species

G1 - Globally critically imperiled; typically 5 or fewer occurrences

G2 - Globally imperiled; typically 6 to 20 occurrences

G3 - Globally vulnerable; typically 21 to 100 occurrences

G4 - Globally apparently secure; usually > 100 occurrences

G5 - Globally demonstrably secure although it may be rare in parts of its range

(See Attachment A: Explanation of Heritage Program Ranking System Methodology.)

- B. The following species and plant communities are not currently given any special status but merit special management attention because of their rarity on a statewide level in Colorado (they are ranked as either S1 or S2 species by the Colorado Natural Heritage Program) and the high quality of their occurrences within the LSFO. Special management attention and assessment should be devoted to these species within the LSFO, including assessment of impacts from proposed uses and management strategies.

Species Group	Common Name	Scientific Name	Global Rank*	State Rank*
<b>Mammals</b>	White Tailed Prairie Dog	Cynomys leucurus	G4	S2S3
<b>Reptiles</b>	Northern Tree Lizard	Urosaurus ornatus	G5	S2
	Smooth Green Snake	Liochlorophis vernalis	G5	S2
	Northern Plateau Lizard	Sceloporus undulatus elongatus	G5T5	S2
<b>Plants</b>	Hamilton Milkvetch	Astragalus lonchoca	G1	S1
	Yampa/Penlands Beardtongue	Penstemon acaulis var yampaensis	G3Q	S1S3

	Maybell Locoweed	Oxytropis besseyi var. obnapiformis	G5T2	S1
	Bluemountain Penstemon	Pentstemon scariosus var cyanomontanus	G4T2	S2
	Park Rock Cress	Boechera fernaldian	G3G4T 3T4	S2
<b>Plant Communities</b>	Cold Desert Shrublands	Atriplex confertifolia/Stipa comata	G1G2	S1S2
	Western Slope Sagebrush Shrublands	Artemisia nova/Pseudoroegneria spicata	G5	S2
	Western Slope Sagebrush Shrublands	Artemisia nova/Stipa comata	G4	S2

**\*Key:**

G1 - Globally critically imperiled; typically 5 or fewer occurrences

G2 - Globally imperiled; typically 6 to 20 occurrences

G3 - Globally vulnerable; typically 21 to 100 occurrences

G4 - Globally apparently secure; usually > 100 occurrences

G5 - Globally demonstrably secure although it may be rare in parts of its range

S1 - State critically imperiled; typically 5 or fewer occurrences

S2 - State imperiled; typically 6 to 20 occurrences

S3 - State vulnerable; typically 21 to 100 occurrences

S4 - State apparently secure; usually > 100 occurrences

S5 - State demonstrably secure

(See Attachment A: Explanation of Heritage Program Ranking System Methodology.)

**Issues**

Due to the vulnerable status of the species and communities above and the potential impacts of current and future uses and management activities on their future survival, the following issues should be addressed throughout the LSFO RMP Revision in order to ensure protection of these species and habitats, and to avoid the need for future listings.

**A. How will proposed uses and management activities affect native plant and animal communities?**

Each of the following uses and management practices have the potential to significantly impact the long-term health of native plant and animal communities inhabiting both the uplands and the riparian areas of the LSFO. The impacts from these uses and management practices on native plant and animal communities should be assessed and addressed throughout the RMP revision:

- Oil and gas extraction practices – particularly fragmentation from roads, pipelines and other developments
- Recreation management – including OHV use
- Wild horse management – including appropriate herd management levels
- Fire management – including wildfire management, prescribed fire, and fuels treatments

- Grazing practices – including stocking levels, seasons of use, and distribution
- Vegetation management practices – including chemical and mechanical treatments and their effects particularly on native shrub and riparian communities and their associated species

**B. How will special status species and their habitats be managed to recover listed species, protect and conserve candidate and sensitive species, and restore their habitats to avoid the need for future listing?**

- What is the relative value and scarcity of the special status species that occur within the LSFO management area?
- From a regional perspective, what is the importance of the planning area for special status species, scarce species and the plant communities that sustain them?
- What uses and management practices have the potential to threaten the long-term persistence of these special status species and the habitats that support them?
- How can those threats be reduced and mitigated?
- What is the desired future condition of the special status species populations, plant communities, and ecological systems within the management area?
- What are the areas of highest priority for protecting, maintaining and restoring special status species, scarce species and the plant communities that sustain them?

**C. What habitat areas and plant communities are in need of restoration and what is the potential for restoration of these areas?**

**D. Should additional special management areas (ACEC's, RNA's, etc.) be created to protect areas of significant environmental concern?**

The attached map (Attachment B) shows areas with high biological significance based on known occurrences of species, plant communities or ecological sites that may be relatively scarce on a regional and/or global basis. These areas represent just one scenario created through an analysis intended to identify an efficient, optimal set of areas on which to focus special management attention and thereby contribute to the long-term survival of the species, plant communities, and ecological systems within the region. Some of these areas may be suitable for consideration as special management areas or areas with special management guidelines. We can provide more detail upon request. Additional information is available in the Wyoming Basin, Southern Rocky Mountains and Utah- Wyoming Rocky Mountains Ecoregional Assessments (Nature Conservancy 2000).

**Management Concerns**

The following are some management concerns that should be addressed to ensure the successful development and implementation of a scientifically credible LSFO RMP:

- A. Will the LSFO RMP utilize the best and most current available scientific information on the special status species occurrences, distribution and habitat trends? (Colorado Natural Heritage Program, Colorado Division of Wildlife, Rocky Mountain Bird Observatory, etc.)
- B. Is there a system in place to regularly update the information on special status species occurrences and threats to those species and their habitats?
- C. Does the LSFO have an area-wide strategy for prioritizing and controlling invasive plant species, particularly early invasives listed on the 2003 Colorado Noxious Weed Act “A List”, such as Yellow Starthistle and Myrtle Spurge?
- D. Is this strategy coordinated with other entities responsible for weed management (Moffat, Routt, Rio Blanco Counties, Colorado, Utah and Wyoming, United States Park Service, Colorado State Land Board, Colorado Division of Wildlife, and private property owners)?
- E. In order to successfully practice Adaptive Management principles, desired outcomes must be identified and consistent, structured monitoring must be carried out. Will the BLM provide the necessary funding and support to ensure that monitoring plans are implemented?

## Attachment A: Explanation of Heritage Program Ranking System Methodology

The global element rank that best characterizes the relative rarity or endangerment of the element worldwide. Global ranks are derived primarily by staff at the Central Heritage Conservation Science Department, unless CNHP has lead responsibility for that element (ex. state endemics).

Attribute\_Domain\_Values:

- G1 - Globally critically imperiled; typically 5 or fewer occurrences
- G2 - Globally imperiled; typically 6 to 20 occurrences
- G3 - Globally vulnerable; typically 21 to 100 occurrences
- G4 - Globally apparently secure; usually > 100 occurrences
- G5 - Globally demonstrably secure although it may be rare in parts of its range
- G#G# - A range between two of the numeric ranks indicates uncertainty about the rarity of the element worldwide
- NR - Unranked; element is not yet ranked globally
- GU - Unrankable; not enough information is known
- GH - Historically known with hopes of rediscovery
- GX - Extinct; unlikely to be rediscovered
- T# - Rank applies to a subspecies or variety
- Q - Taxonomic status is questionable
- C - Element is extant only in captivity or cultivation
- \*Other factors, in addition to the number of occurrences, may be considered when assigning a global rank

Attribute\_Label: CNHP State Rank

Attribute\_Label\_Definition:

The state element rank that best characterizes the relative rarity or endangerment of the element statewide. State ranks are derived by CNHP staff.

Attribute\_Domain\_Values:

- S1 - State critically imperiled; typically 5 or fewer occurrences
- S2 - State imperiled; typically 6 to 20 occurrences
- S3 - State vulnerable; typically 21 to 100 occurrences
- S4 - State apparently secure; usually > 100 occurrences
- S5 - State demonstrably secure
- S#S# - A range between two of the numeric ranks indicates uncertainty about the rarity of the element in the state
- NR - Unranked; element is not yet ranked in the state
- SU - Unrankable; not enough information is known
- SH - Historically known with hopes of rediscovery
- SX - Extinct; unlikely to be rediscovered
- SE - An exotic established in the state; native to a nearby region
- SA - Accidental; includes species (usually birds or butterflies) recorded once or twice or only at very great intervals, hundreds or thousands of miles outside usual range
- SR - Reported in the state, but not confirmed
- SZ - Zero occurrences; typically refers to nonbreeding bird populations
- B - Rank refers to the breeding population of the element
- N - Rank refers to the nonbreeding population of the element
- C - Element is extant only in captivity or cultivation
- \*Other factors, in addition to the number of occurrences, may be considered when assigning a state rank

**Attachment B: Areas of High Biological Significance**

