



CENTER FOR NATIVE ECOSYSTEMS

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9 March 2007

Kent Walter
Field Manager
White River Field Office
Bureau of Land Management
220 East Market Street
Meeker, CO 81641

BY HAND-DELIVERY

Dear Mr. Walter:

Center for Native Ecosystems is pleased to provide these nominations for additional Areas of Critical Environmental Concern in the White River Field Office. We are providing a narrative description of the areas nominated here, along with a CD containing GIS data depicting an approximation of the location of these areas given the data available to us at this time, and two paper map versions showing the general location of these areas within the Field Office.

As the RMP revision process continues, we may add to or modify these nominations as new data become available. For example, we understand that more recent white-tailed prairie dog mapping shows that the Snake John Subcomplex of the Coyote Basin Complex extends into Colorado. We had previously nominated the Snake John Subcomplex as a new ACEC in the Vernal Field Office, and hereby nominate any portion of the Snake John Subcomplex that occurs in the White River Field Office. The GIS data we are providing today do not include this newer mapping yet. We also understand that the Colorado Natural Heritage Program will be working in Rio Blanco County this summer, and depending on the results of their fieldwork we may nominate additional areas and/or refine the boundaries of the areas we are nominating today.

Therefore, it may be easiest to think of our nominations in terms of the specific values that we believe meet the relevance, importance, and need for special management in the White River Field Office. Our nominations encompass all of the following types of areas on BLM surface within the White River Field Office's boundaries:

1. Habitat for the Dudley Bluffs bladderpod and Dudley Bluffs twinpod that is not already within existing ACECs - we have included in our data the additional polygons of occupied habitat that we are aware of (subtracting out the polygons that would be covered

by the portions of the Dudley Bluffs Potential Conservation Area which do not yet have ACEC status, which we are also nominating), but ACEC protection for these occurrences should be larger so as to provide buffers from disturbance and retain ecosystem processes for these species (buffers should extend a minimum of 300 ft. from the occupied habitat).

2. Graham's penstemon habitat - the White River Field Office contains a critical habitat unit included in the U.S. Fish and Wildlife Service's listing proposal which is not included in the Raven Ridge ACEC. Dr. Vince Tepedino with the Logan Bee Lab has recommended half-mile buffers for Graham's penstemon occurrences to conserve its pollinators, so we are nominating this buffer area as well. The Raven Ridge Potential Conservation Area that we are also nominating would expand the existing Raven Ridge ACEC to cover the remaining proposed critical habitat units in the Field Office along with associated buffers.
3. Narrow-stem gilia habitat - the data we are providing depict additional occurrences that we are aware of that are outside the existing Lower Greasewood Creek ACEC. Again, buffers of at least 300 ft. should be added to the protected area (the GIS data we are providing include 300 ft. buffers around three point locations, plus three unbuffered polygons).
4. Narrowleaf evening primrose habitat - the data we are providing show two occurrences on BLM surface in the White River Field Office that we are aware of, both of which are near Potential Conservation Areas that we are also nominating. ACECs for these areas should be expansive enough to cover the occurrence, the nearby PCA, and buffers of at least 300 ft. around each occurrence.
5. Colorado Natural Heritage Program Potential Conservation Areas - some of the PCAs in our data may actually be fully covered by existing ACECs - the slight discrepancies between existing ACECs and PCAs for South Cathedral Bluffs and East Douglas Creek may be mapping errors rather than areas lacking protection, for example. To be safe, we have included all portions of PCAs that are not fully covered by existing ACECs given the data we currently have available. Protecting several PCAs could be accomplished by simply expanding existing ACECs slightly. The White River Field Office has done this in the past, and Raven Ridge is a good example. We will provide the PCA Site Description Reports written by the Colorado Natural Heritage Program to the BLM via email shortly.
6. Greater sage-grouse leks plus four-mile buffers - we have provided the NDIS data for sage-grouse production areas in the Field Office. The NDIS data define production areas as being within two miles of a lek, so we buffered the data by an additional two miles to result in a four-mile buffer around leks consistent with research on greater sage-grouse nesting in northwestern Colorado. We then clipped the four-mile buffers to BLM surface and to exclude existing ACECs and other areas we are including in this set of nominations. The BLM or the Colorado Division of Wildlife may have more accurate lek location data - our nominations should include all the BLM surface in the Field Office contained within all lek sites plus four-mile buffers around each site. This results in an ACEC (or multiple ACECs if the BLM prefers) that contains multiple parcels, but the White River Field Office has already designated ACECs of this nature - the White River Riparian ACEC is an especially good example.
7. Large white-tailed prairie dog complexes - we have already nominated the Wolf Creek Complex and the Coyote Basin (Colorado) Subcomplex of the Coyote Basin Complex as ACECs, and, as we explained in the beginning of this letter, we also nominate any BLM-

surface portions of the Snake John Subcomplex of the Coyote Basin Complex, or any other BLM-surface portions of a white-tailed prairie dog complex of 5000 acres or more (including both historically and currently occupied acreage) within the Field Office. Our 2003 nominations also included the Coal Oil Basin complex. While GIS data depicting colony locations for this complex are not available to us, any BLM surface within this complex should be construed as being part of our nominations. Our 2003 nominations explained the procedure that the BLM should use to delineate the boundaries of these complexes, and the GIS data we have provided depict the generalized location of these areas - the BLM should use the method outlined in our 2003 nominations for the actual ACEC boundaries.

Thank you for considering these nominations. Please contact me with any questions. We look forward to working with your staff to ensure that the very special biological resources of the White River Field Office are conserved for future generations.

Sincerely,

Erin Robertson
Senior Staff Biologist

Areas of Critical Environmental Concern Nominated by Center for Native Ecosystems

